

Independent Solutions Wealth Management, LLC

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This Brochure provides information about the qualifications and business practices of Independent Solutions Wealth Management, LLC “Independent Solutions”. If you have any questions about the contents of this Brochure, please contact us at 716-568-8566 and/or gwiggle@iswealthmanagement.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.

Independent Solutions Wealth Management, LLC is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information about which you can determine to hire or retain an Advisor.

Additional information about Independent Solutions Wealth Management, LLC also is available on the SEC’s website at www.advisorinfo.sec.gov.

Item 2 – Material Changes

The Material Changes section of this brochure will be updated annually, or more frequently, if/when material changes have occurred since the previous release of the Firm's Disclosure Document. In the event there have been material changes, clients of Independent Solutions Wealth Management, LLC will receive a copy of this Material Changes section. At least annually clients of Independent Solutions Wealth Management, LLC will be offered a copy of the Firm's complete Disclosure Document which also defines any material changes that have occurred.

Since its last Disclosure Document filing in January 2013, the Firm has adjusted its Investment Management Agreement to clarify wording regarding Independent Solutions Wealth Management, LLC's ability to amend its fees and billing arrangements. Previous wording in the Firm's Investment Management Agreement indicated that fees and/or billing arrangements could be amended unilaterally by the Firm, with thirty (30) days prior written notice to affected clients. Recent market trends, however, have shown the need to respond to portfolio value shifts in a timelier manner, which has proven to be occasionally incompatible with that prior notice stipulation. This current revision to its Disclosure Document and contract language now indicates that the 30-day prior notification remains the norm but may be waived, at the discretion of the advisor, if such a unilateral change is warranted due to fluctuations in account values which have an immediate impact on minimum portfolio size requirements.

Independent Solutions Wealth Management, LLC will provide its clients with its most current Disclosure Document and Brochure Supplement, as necessary, based on changes or new information, at any time, without charge. In addition, annually it is offered to all clients through a separate mailing. Currently, our Disclosure Document and Brochure Supplement may be requested by contacting Glenn Wiggle, the Firm's Chief Compliance Officer, at (716) 568-8566 or gwiggle@iswealthmanagement.com.

Additional information about Independent Solutions Wealth Management, LLC is also available via the SEC's web site www.advisorinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Independent Solutions Wealth Management, LLC who are registered, or are required to be registered, as Investment Advisor Representatives of Independent Solutions Wealth Management, LLC.

Item 3 -Table of Contents

Item 1- Cover Page	i
Item 2- Material Changes	ii
Item 3- Table of Contents	iii
Item 4 - Advisory Business	1
Item 5- Fees and Compensation	5
Item 6- Performance-Based Fees and Side-By Side Management	8
Item 7- Types of Clients	8
Item 8- Methods of Analysis, Investment Strategies and Risk of Loss	9
Item 9- Disciplinary Information	14
Item 10- Other Financial Industry Activities and Affiliations	14
Item 11- Code of Ethics	15
Item 12- Brokerage Practices	16
Item 13- Review of Accounts	18
Item 14- Client Referrals and Other Compensation	18
Item 15- Custody	19
Item 16- Investment Discretion	19
Item 17- Voting Client Securities	19
Item 18- Financial Information	20
Brochure Supplement	21

Item 4 – Advisory Business

Independent Solutions Wealth Management, LLC, hereinafter referred to as “ISWM”, “we”, “us” or “Firm”, has been in business since 2008. Independent Solutions is owned by Glenn Wiggle, Michael Lomas, Harvey Neiman, and Daniel Neiman. Michael Lomas and Glenn Wiggle each own more than 25% of the company. We provide various types of investment advice and related financial services for individuals and businesses, based upon the investment objectives of the particular client. We offer our investment advisory services on both a discretionary and nondiscretionary basis. If we are engaged on a nondiscretionary basis, you are under no obligation to act upon any of our recommendations and you retain sole discretion to implement our recommendations and you are free to accept or reject our recommendations. If we are engaged on a discretionary basis and a client wishes to impose restrictions on investments by specific security or asset class, the client may do so in writing. Depending upon your circumstances and desired services, our investment management services are primarily offered through (1) selecting and managing a portfolio of mutual funds (referred to as our “Mutual Fund Portfolio Management”); (2) selecting and managing a portfolio of exchange traded funds (referred to as our “ETF Portfolio Management”); (3) selecting and managing a portfolio of individual securities (referred to as our “Stock Portfolio Management”); (4) selecting one of more third party managers for your account (referred to as our “Third Party Manager Selection”); (5) consulting services including direct Financial Plans and Third Party Financial Plans; or (6) selecting and managing Tactical Portfolios using ETFs or Mutual Funds (referred to as our “Tactical Portfolio Management”).

Mutual Fund Portfolio Management

You may engage us to provide diversified portfolio management. In that case, depending on your personal financial situation, we may recommend that you invest in accordance with one or more of our mutual fund portfolios. We have developed a number of portfolios which include Limited Partnership’s and non-traditional asset classes. All portfolios are based upon asset allocation and diversification paired with a client’s risk tolerance. We research money managers to determine which managers should be on our list of “Best in Breed Money Managers.”

The first step we take in determining our list of “Best in Breed Money Managers” is to establish the asset allocations of each of the portfolios. We use widely recognized broad asset allocations which are: very conservative, conservative, moderate, moderate aggressive and very aggressive.

After determining the broad asset classes, we next determine the more detailed allocations using categories from large cap growth and value to international real estate. In most cases, we use at least eight sub-asset classes in each portfolio. We then break down the available mutual funds into these sub-asset classes. By doing so we are able to compare managers’ styles and performance to other managers who are buying the same types of investments. By following these specific research procedures we are able to identify our “Best in Breed Money Managers.”

We re-evaluate the managers on a monthly basis in order to determine whether our managers are still performing according to our criteria. If we are concerned about the performance of one of our managers, that manager will be placed on probation and tracked on a monthly basis. If we determine that the manager is solidly performing, then the manager will likely stay on our list of

managers. If we determine that the underperformance is due to a manager change, a shift in investment policy or just poor security selection, the manager may be replaced.

The last step in our approach is portfolio review. We will review on a semi-annual basis the clients' portfolio allocations in relation to the model allocation. If warranted, we will rebalance at that semi-annual review. In certain cases based on market conditions or possibly in the event of a manager change, we may rebalance more frequently or less frequently than semi-annually.

ETF (Exchange Traded Funds) Portfolio Management

You may engage us to provide ETF Portfolio Management services to you. In that case, depending on your personal financial situation, we may recommend that you invest in one or more ETF portfolios. We manage portfolios of Exchange Traded Funds (ETF's) in a manner similar to our management of mutual fund portfolios. An ETF is a security that tracks an index, a commodity or a basket of assets like an index fund, but trades like a stock on an exchange, thus experiencing price changes throughout the day as it is bought and sold. We use our research capabilities to allow us to compare performance and cost of funds that track the same or similar indexes to determine the "Peer Group Out Performers." The indexes used, follow the same broad asset allocations as previously referenced in the mutual fund description above.

By taking these "Peer Group Out Performers" and using them in more specific, detailed asset classes, we form our ETF Portfolios. The same ongoing management we instill in our mutual fund portfolios carries over to our ETF Portfolios, namely re-applying research on a monthly basis and re-balancing semi-annually if necessary.

Stock Portfolio Management

If you are interested in investing in individual securities, we may recommend our Stock Portfolio Management services using a portfolio of individual stocks, bonds, or other types of securities. Because our Stock Portfolio Management involves more active trading and a higher degree of risk, this is not a suitable investment for every client. Stocks held in the account will be closely monitored, typically on a daily basis. This service may include short-term trading activities. Generally, we do not take into consideration the income tax effects of purchases and sales of securities held in the account. Clients may be subject to additional fees/expenses charged by the clearing firm (Fidelity or Schwab) such as ticket charges or asset based pricing. We require a minimum balance of \$100,000 for each client using the Stock Portfolio Management services. We may waive this requirement for any reason including, but not limited to a client that has additional or related accounts that together exceed the minimum requirements.

Third Party Manager Selection

You may engage us to evaluate, select, and monitor the investment performance of independent investment managers ("Third-Party Managers"). Third-Party Managers may offer specialized expertise and experience in specific asset classes and, by retaining their services; you may diversify your investment portfolio and strategies.

We will obtain and provide you with information about Third-Party Managers, including their disclosure brochure, Form ADV Part 2. You will be subject to any minimum account size or other conditions imposed by each Third-Party Manager, though we may be able to obtain ex-

ceptions from those conditions for our clients. You will then directly engage that Third-Party Manager using that advisor's client services contract. You will pay that advisor's fees and charges, described in the advisor's Form ADV Part 2 and client services contract.

On a going-forward basis, we will monitor and periodically report to you on the Third-Party Manager's performance with respect to your assets under that advisor's management. We will not be responsible for that advisor's actions, omissions, or performance. Our responsibility will be limited to initially evaluating and recommending suitable investment advisors for your account based upon reasonably available information at the time of the advisor's engagement and periodically reporting on the advisor's investment performance for your account. We will perform an initial limited background investigation on each advisor, based in large part upon the information provided to us by the advisor and public sources of information. We may from time to time update our limited background check on the advisor if known changes in the advisor's circumstances warrant.

Third-Party Managers are not affiliated with our firm and we are not responsible for their services. If we receive any compensation from a Third-Party Manager for making a referral, you will receive a specific disclosure brochure about the nature of the referral, the referral relationship, and the referral compensation.

If you terminate our services, you may be able to continue using the Third-Party Manager; however, we will have no continuing responsibilities after our termination with respect to your account or the advisor.

Tactical Portfolio Management

While most of our investment strategies involve strategic asset allocation, we do offer a few tactical portfolios that use either mutual funds, ETFs or a combination of the both. We currently offer both a tactical high yield portfolio as well as a tactical stock model. The tactical models have the ability to go both long or short the market or be in cash/money market for periods of time depending on the market conditions. We will typically use index funds or ETFs as the primary account holdings. The tactical portfolios may at time use leverage funds that represent 2x the market return or 2x inverse.

Small Account Models

ISWM also offers small account models for the convenience of our clients and advisors/solicitors to allow clients to consolidate assets. We allow for direct investment in any of the available Neiman Funds, which currently includes the Neiman Tactical Income Fund, Neiman Balanced Allocation Fund and Neiman Large Cap Value Fund. Funds will be purchased on a load-waived basis. Since Independent Solutions Wealth Management, LLC (ISWM) and Neiman Funds Management LLC have mutual owners, ISWM is waiving its standard investment advisory fee.

However, the solicitor may add on a solicitor fee up to 2.00% (See Item 10 in ADV for additional disclosure information).

To qualify for smaller account models clients need to have other accounts at ISWM where the household exceeds \$50,000 in total assets. ISWM may waive this requirement at their discretion.

The account minimum for each of our small account portfolios is \$3,000 and is available to a maximum of \$50,000. If the client account value reaches \$50,000 by either additional contributions or market appreciation, we will require a transition into one of our Strategic or Tactical models, with all related applicable fees. ISWM may waive this requirement at their discretion.

Types of Investments

We offer advice about a wide variety of investment types, including individual stocks, mutual funds, index funds, exchange-traded funds, and fixed and variable annuities. With respect to these investments, you should be aware of the following:

Mutual Funds, Index Funds, and Exchange-Traded Funds: Mutual funds of all types charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. These separate mutual fund fees are disclosed in each fund's current prospectus, which is available from the mutual fund and, upon request, can be provided by our firm.

Consequently, for any type of mutual fund investment, it is important for you to understand that you are directly and indirectly paying two levels of advisory fees and expenses: one layer of fees at the fund level and one layer of advisory fees and expenses to us. Generally speaking, most mutual funds may be purchased directly, without using our services, without incurring our advisory fees. Moreover, many mutual funds pay shareholder servicing fees (12b-1 fees) to brokerage firms in consideration of their services to the fund's shareholders. From time to time, we may accept shareholder servicing fees with respect to accounts which are not subject to ERISA.

Most mutual funds offer several "classes" of their shares which may be purchased by different types of investors or investors with different investment objectives. These are also described in the mutual funds' prospectuses. Depending on your investable assets, investment objectives, and time horizon, different classes may be more appropriate for your circumstances. We would be pleased to discuss with you the available classes of mutual fund shares that may be available, the different purposes for which they may be purchased, and the differences in commissions and charges that are associated with each share class.

Variable Annuities: Variable annuities are highly complex financial products offered by insurance companies. Your investment in a variable annuity contract is subject to both general market risk and the insurance company's credit risk. These and other risks are described in the variable annuities' prospectuses. Variable annuities are regulated under both securities and

insurance laws and related rules and regulations. Variable annuities offer various benefits and features which may or may not have value to you depending on your circumstances and we would be pleased to discuss them with you. Like other types of investments, commissions are paid for the purchase of variable annuities and there may be substantial surrender charges. These commissions surrender charges and other expenses are disclosed in the prospectus.

Like mutual funds, insurance companies charge a variety of fees and charges against the assets invested in the separate accounts of their policy holders. As noted above, this means that there are two layers of advisory fees incurred – one layer by the insurance company and one layer to our firm for our advisory services.

Account Minimums and Criteria

Our minimum account size varies depending on the type of model and portfolio and ranges from \$3,000 up to \$100,000. We may waive minimum account requirements for any reason including, but not limited to a client that has additional or related accounts that together exceed the minimum requirements.

Also certain Third Party Manager(s) may impose more restrictive account requirements. In such instances, we may alter our corresponding account requirements to accommodate those of the Third Party Manager(s).

Other Firm Information

As of 8/31/2013, the Firm's assets under management are \$130,464,717.76 for 1127 client accounts. All assets are managed on a discretionary basis only. Independent Solutions does not participate in any wrap fee programs.

Item 5 – Fees and Compensation

Financial Planning and Consulting

The advisor provides financial planning and consulting services consistent with clients' financial and tax status, in addition to their risk profile and return-objectives. The advisor may also provide general non-securities advice on topics that may include tax and budgetary planning, estate planning, insurance planning and business planning.

Clients are charged a fixed advisory fee that ranges from \$250 to \$500 as well as a solicitor's fee ranging from \$0 to \$10,000 for financial planning services when the client was referred by an independent third party advisor and that advisor assisted with information gather among other services.

When the advisor performs all information gathering and is primarily responsible for interactions with the client, fees will range from \$500 to \$10,000. The fee a client pays is based on the complexity of the plan and the range of services provided.

The advisor estimates the length of the project, the amount of work involved and the range of services that will be provided. These issues are discussed with the client and the fees are noted

in the agreement the client signs. Fees are due and payable upon completion of the plan or services or monthly in arrears based on the services received.

It is anticipated that the financial plan produced will be delivered within six months or sooner of the date of the Agreement. The advisor considers fees for financial planning or a consulting project to be earned as progress is realized toward creation of the plan or completion of the service.

Since fees are payable after services are performed, there are no unearned fees and the client is not due a refund upon early terminate of an agreement. However the advisor's fees are prorated from five (5) business days after signing the agreement to the date of termination.

When multiple services are offered, there is a potential conflict of interest since there is an incentive for the party offering financial planning services to recommend products or services for which the advisor, or a related party, may receive compensation. However, financial planning clients are under no obligation to act upon any recommendations of the advisor or to effect any transactions through the advisor if they decide to follow the recommendations.

Advisory Fees

Our advisory fees for our Mutual Fund Portfolio Management service, ETF Portfolio Management service CD Portfolio Management service and Third Party Manager Selection service range from .3 percent (30 basis points) up to 2.5 percent (250 basis points) of the assets in the account as specified in our Investment Management Agreement. Our advisory fees for the Stock Portfolio Management service may range from .75 percent (75 basis points) up to 2.75 percent (275 basis points) of the assets in the account. In determining the fee that we charge our clients who are referred to us by a solicitor, we start with a base fee of .3 percent (30 basis points), .5 percent (50 basis points) or .75 percent (75 basis points) and add to that fee the solicitation fee charged by the solicitor. If there is no solicitor, we will charge a fee of .5 percent (50 basis points) up to 2.5% (250 basis points). Therefore, if you are referred to us by a solicitor, your total advisory fees will be based, in part, on the amount of the solicitation fee paid by us to the solicitor. You may be paying more or less than our other clients for the same advisory services depending upon the amount of your advisory fees that will be paid to the solicitor.

Our advisory fees are in addition to the fees charged by any other advisor under our Third Party Manager Selection service. You may also incur fees and charges for brokerage and custodial services such as ticket charges, third-party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions in connection with the management of your account. Mutual funds and exchange traded funds also charged internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we will not receive any portion of these commissions' fees, and costs. In addition, mutual funds and stock investments are meant to be long term investments. You may be subject to short term trading fees imposed by some mutual fund companies held in the managed mutual fund portfolios. These fees typically range from 1% to 2% and are charged when a fund in the

portfolio is liquidated within 90 days of purchase. Such short term trading fees are exclusive of and in addition to our fee, and we will not receive any portion of these fees. The advisor is compensated for investment management or supervisory services based on clients' assets under management. Fees are paid quarterly in arrears and are negotiable. Fees are due on the first day of the calendar quarter, and are based on the account's asset value as of the average daily balance of the previous calendar quarter. Fees are prorated for accounts opened during the quarter.

If we engage in a consulting project, we will typically charge hourly rates ranging from \$150 to \$300 per hour depending on the nature and complexity of the project. Fees for consulting projects may be billed monthly, at the end of a project or as agreed to with the client. Consulting fees will be paid directly by the client and will not be billed to the custodian.

The Firm may from time to time unilaterally amend its fee and/or billing arrangements. Generally, any such change will become effective after thirty (30) days prior written notice from the advisor to the client, unless the client terminates the investment management agreement. The thirty day notification period may be waived by the advisor, however, if such change is warranted due to fluctuations in account values having an immediate impact on minimum portfolio size requirements. If such a change becomes necessary within thirty days prior to the end of a calendar quarter, the adjusted fee schedule will be applied to the next quarterly billing of fees following such change.

Direct Billing to Your Custodian

Our Investment Management Agreement contains your authorization to directly bill our fees to your account custodian. Your custodian's periodic statements will show each fee deduction from your account. You may withdraw your authorization for direct billing of these fees at any time by notifying us or your custodian in writing. You should understand, however, that we do not charge interest on overdue accounts and our rates are premised upon this automated billing process. So, if you elect to withdraw your billing authorization, we may need to change our fee structure or terminate our services to you.

Termination of Services

You may terminate any of our services, without incurring a fee or penalty, within the first five (5) business days after the date you sign our client services contract. After this initial five business day period, either you or we may terminate the contract upon five business days' written notice for any reason. Since fees are payable after services are performed, there are no unearned fees and the client is not due a refund upon early termination of an investment advisory contract. However, the advisor's fees are prorated to the date of termination. You will still be responsible for paying the balance due for our services rendered during that quarter.

Upon termination of our financial planning services, any pre-paid advisory fees will be prorated and (if more than \$5.00) refunded based on the number of days services were rendered during that calendar quarter. Refunds of fees paid from a tax-qualified plan or account should be returned to the plan or account so they are not treated as distributions. Some plan custodians may treat such refunds as new contributions, which may reduce the amount of other contributions you can make during that tax year. Upon termination of our consulting services,

typically the initial deposit will not be refunded if we have performed services for your benefit. If we have completed the project, you will still be responsible for paying the balance due for our services rendered.

Relationship Disclosure

Some associated persons of ISWM (Glenn Wiggle, Michael Lomas, Dan Neiman and Harvey Neiman) have an ownership interest in Neiman Funds Management LLC (“NFM”), a registered investment advisor. NFM provides investment advisory services to Neiman Large Cap Value Fund (the LCV Fund), Neiman Balanced Allocation Fund and Neiman Tactical Income Fund (the TIF Fund), collectively (“Neiman Funds”). As a result of this relationship, the associated persons may receive additional economic benefits in the way of either expense reimbursement or fee sharing arrangements. The Neiman Funds may reimburse NFM for marketing and distribution expenditures related to the Fund family.

The Neiman Funds are also investment products offered to clients within the model portfolios designed by Independent Solutions Wealth Management, LLC. These relationships may create an incentive for the associated persons to recommend that clients invest in the Neiman Funds and for Independent Solutions Wealth Management, LLC to continue to include it in their model portfolios.

However, to address this potential conflict of interest, clients are under no obligation to act upon any recommendations of the associated persons and may opt out of including any Neiman Funds in their portfolio.

For the small account models only, ISWM has chosen to waive their standard advisory fee of .50 percent since the portfolio will consist entirely of Neiman Funds options. When the account size reaches \$50,000 the small account model will be reallocated into the full model allocation and the .50 percent investment advisory fee will be reinstated.

NFM receives an annual investment management fee from the Neiman Funds of 1.00% of the average daily for net assets for the LCV Fund, The Neiman Balanced Allocation Fund, and the TIF. Additionally, NFM has agreed to waive management fees and reimburse expenses to the extent necessary to maintain total annual operating expenses of the LCV Fund, Balanced Allocation Fund, and TIF Fund (excluding brokerage fees and commissions, interest and other borrowing expenses, taxes, extraordinary expenses and the indirect costs of investing in Acquired Funds) at 1.45% of its average daily net assets for Class A Shares through July 31, 2013.

Item 6 – Performance-Based Fees and Side-By-Side Management

Independent Solutions Wealth Management, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Independent Solutions Wealth Management, LLC provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, trust programs. The minimum dollar amount generally required to open an account is \$50,000.

However certain models will have a lower minimum of \$3,000 (small account models) or \$25,000 (Beta Source models). The minimum dollar amount generally required to maintain an account in our services is \$25,000. We may waive this requirement for any reason including, but not limited to, a client that has additional or related accounts that together exceed the minimum requirements.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

We use a variety of methods of investment analysis and obtain information from a number of sources including, but not limited to, Morningstar, Yahoo Finance, and Investors Business Daily. These sources are both public and by purchase, which we believe to be reliable and upon which we regularly depend for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information.

We use both fundamental and technical methods to analyze the securities in which we invest client accounts. Fundamental analysis is a technique that attempts to determine a security's value by focusing on the economic wellbeing of a financial entity as opposed to only its price movements. It generally involves assessing a company's or security's value based on factors such as financial structure, sales, earnings, assets, markets, management, products and services.

When conducting fundamental analysis, we will review a company's financial statements and consider factors including whether the company's revenue is growing, if the company is profitable, if the company is in a strong enough position to beat its competitors in the future, and if the company is able to repay its debts.

We also utilize technical analysis to evaluate potential investments. Unlike fundamental analysis, technical analysis does not analyze the company's value, but instead analyzes the trends and movements in a security's price in the market. Technical analysis studies the supply and demand in the market in an attempt to determine what direction, or trend, will continue in the future.

Investment Strategies

We have developed a number of strategies that include strategic allocation portfolio management, tactical portfolio management and individual stock management.

Our strategic allocation portfolios are based on the principles of Modern Portfolio Theory and Efficient Frontier portfolio modeling. We generally follow portfolio allocations consistent with those recommended by Morningstar; however we also offer our own allocation models and strategies as well as tactical strategies using index type mutual funds or ETFs.

The first step we take in determining our list of "Best in Breed Money Managers" is to establish the asset allocations of each of the portfolios. We use widely recognized broad asset allocations which are: very conservative, conservative, moderate, moderate aggressive and very aggressive.

After determining the broad asset classes, we next determine the more detailed allocations using categories from large cap growth and value to international real estate. In most cases, we use at least eight sub-asset classes in each portfolio. We then break down the world of mutual funds into these sub-asset classes. By doing so we are able to compare managers' styles and performance to other managers who are buying the same types of stocks. When conducting our analysis we review such factors as manager tenure, turnover, alpha, performance, as well as risk factors such as standard deviation and beta.

We re-evaluate the managers on a monthly basis in order to determine whether our managers are still top performing fund managers. If we are concerned about the performance of one of our managers, that manager will be placed on probation and tracked on a monthly basis. If we determine that the manager is solidly performing, then the manager will likely stay on our list of managers. If we determine that the underperformance is due to a manager change, a shift in investment policy or just poor selection, the manager will be replaced.

The last step in our approach is portfolio review. We will review on a semi-annual basis the clients' portfolio allocations in relation to the model allocation. If warranted, we will rebalance at that semi-annual review. In certain cases based on market conditions, we may rebalance more frequently or less frequently than semi-annually.

For our tactical portfolio management we engage a number of research methods and information to determine the portfolio position whether long, short, or neutral. We will analyze such economic indicators as relative strength, moving averages, overall economic information, and chart analysis. We engage a number of different research services including, at time, purchasing signals from other advisory firms. ISWM offers both tactical bond portfolios and tactical stock portfolios and typically use Rydex funds or a similar fund or ETF that is similar to an index such as the S&P 500, Nasdaq Composite, or a bond index.

We also manage portfolios of Exchange Traded Funds (ETF's) in a manner similar to our management of mutual fund portfolios. An ETF is a security that tracks an index, a commodity or a basket of assets like an index fund, but trades like a stock on an exchange, thus experiencing price changes throughout the day as it is bought and sold. We use our research capabilities to allow us to compare performance and cost of funds that track the same or similar indexes to determine the "Peer Group Out Performers." The indexes used, follow the same broad asset allocations as previously referenced in the mutual fund description above.

You may engage us to evaluate, select, and monitor the investment performance of independent investment managers ("Third-Party Managers"). Third-Party Managers may offer specialized expertise and experience in specific asset classes and, by retaining their services; you may diversify your investment portfolio and strategies.

We will review Third-Party Managers, including their disclosure brochure of Part 2 or their Form ADV Part 2, in much the same way we review our mutual fund managers.

Third-Party Managers are not affiliated with our firm and we are not responsible for their services. If we receive any compensation from a Third-Party Manager for making a referral, you

will receive a specific disclosure brochure about the nature of the referral, the referral relationship, and the referral compensation.

If you terminate our services, you may be able to continue using the Third-Party Manager; however, we will have no continuing responsibilities after our termination with respect to your account or the advisor.

We also invest in individual securities for client accounts', we may recommend our Stock Portfolio Management services using a portfolio of individual stocks, bonds, or other types of securities. In recommending our Stock Portfolio Management services, we may consider your net worth to determine whether this investment is appropriate for your personal financial situation. Because our Stock Portfolio Management involves more active trading and a higher degree of risk, this is not a suitable investment for every client. Stocks held in the account will be closely monitored, typically on a daily basis. This service may include short-term trading activities. Generally, we do not take into consideration the income tax effects of purchases and sales of securities held in the account. We require a minimum balance of \$100,000 for each client using the Stock Portfolio Management services. We may waive this requirement for any reason including, but not limited to a client that has additional or related accounts that together exceed the minimum requirements.

We manage three stock portfolios strategies that include all cap growth, large cap value, and large cap value with options. The all cap growth portfolio seeks to maximize returns by investing mainly in common stocks with high relative strength. Although mostly invested in large cap companies, holding may include small cap companies and international companies. The portfolio may also include ETFs that represent a sector or index. The portfolio will typically consist of 10 to 50 holdings.

The large cap value portfolio invests in large cap companies that are typically trading at a discount to their fair value. The portfolio will typically consist of 10 to 40 holdings.

The large cap value with options portfolio holds the same or similar securities as the regular large cap value portfolio but includes a covered call writing strategy on the securities held in the portfolio.

Portfolio holding vary among different clients and may vary from the model portfolio based on the different criteria of each client as well as when the account began.

Risks

Investing in securities involves risk of loss that clients should be prepared to bear. Our primary investment strategy is strategic allocation of mutual funds, ETFs, or Third Party Money (TPM) Managers using efficient frontier models for which we rely heavily on Morningstar research. The primary risk of such a strategy is being fully invested in all market conditions. Another material risk is the underlying mutual funds, ETFs, or TPM managers themselves. These investments may have certain trading restrictions and holding periods that may adversely affect the performance of a client portfolio.

Risks in General

The same factors that affect stock market performance generally affect the underlying funds owned by the clients. Domestic economic growth and market conditions, interest rate levels, and political events are among these factors.

Risks of Investing in Underlying Funds that own Common Stocks

The strategy invests in shares of equity underlying funds that own common stocks, which subjects the strategy and its clients to the risks associated with common stock investing. Overall stock market risks may affect the value of the Funds. When the value of the Fund's investments goes down, your investment in the underlying funds decreases in value and you could lose money.

Risks of Investing in Underlying Funds that own Fixed Income Securities

The strategy may invest in underlying funds, ETFs or TPM managers that own bonds and other debt securities. These securities are subject to the risk that their issuer may not be able to repay the principal and interest when due. In addition, the value of bond and other debt securities held by an underlying fund can change in response to changes in prevailing interest rates, causing volatility and possible loss of value as rates increase.

Risks of Small and Medium Sized Companies

To the extent the strategy invests in underlying funds, ETFs or TPM managers that own stocks of small and medium capitalization companies, the strategy may be subject to additional risks. The earnings and prospects of these companies are more volatile than larger companies. Small and medium sized companies may have limited product lines and markets, and may experience higher failure rates than do larger companies.

Foreign Risk

To the extent the strategy invests in underlying funds, ETFs, or TPM managers that own foreign securities, including American Depositary Receipts ("ADRs"), the strategy may be subject to risks not usually associated with owning securities of U.S. issuers. These risks include adverse political, social and economic developments, differing auditing and legal standards, war, expropriation and nationalization.

Emerging Markets Risk

To the extent the strategy invests in underlying funds, ETFs, or TPM managers that own securities in emerging markets, the strategy will be subject to emerging market risks. The risks of foreign securities are typically increased in emerging markets. These risks include, among other things, political and economic instability, less developed securities markets and currency devaluations.

Sector Risk

Sector risk is the possibility that stocks within the same group of industries will decline in price due to sector-specific market or economic developments. If the advisor invests a significant portion of the strategy's assets in underlying funds, ETFs or TPM managers in a particular sector,

the strategy is subject to the risk that companies in the same sector are likely to react similarly to legislative or regulatory changes, adverse market conditions and/or increased competition affecting that market segment.

Risk of Non-Diversification

The strategy may invest in underlying funds, or ETFs that are non-diversified. A non-diversified fund has the ability to take larger positions in a smaller number of securities than a portfolio that is "diversified". Investing in non-diversified funds may result in greater volatility.

High Yield Securities Risk

The strategy may invest in underlying funds, ETFs, or TPM managers that purchase high yield securities. High yield securities are considered speculative and are less likely to have the capacity to pay interest and repay principal when due in the event of adverse business, financial or economic conditions. We do not believe this investment strategy involves any unusual risks.

Additional Risks for Stock Portfolios

In addition to the risks discussed above, there are additional risks associated with the individual stock portfolios. The primary risk is a concentration in one area of securities, large cap stocks for example. We have certain limitations on qualifications for such an account to minimize these risks. We run several different stock portfolios that may include Large cap Value, Large cap Value with covered call options, and All Cap Growth.

Fundamental Analysis Risk

Because it can take a long time for a company's value to be reflected in the market, the risk associated with this method of analysis is that a gain is not realized until the stock's market price rises to the company's true value.

Technical Analysis Risk

There are risks involved with this method, including the risk that the trends will change unpredictably, which is why we use a combination of methods and obtain information from a variety of sources.

Value Investing Risk

Value investing attempts to identify companies selling at a discount to their intrinsic value. Value investing is subject to the risk that a company's intrinsic value may never be fully realized by the market or that a company judged by the advisor to be undervalued may actually be appropriately priced.

Growth Investing Risks

Growth investing attempts to identify companies that are growing their earnings faster than the broader market and faster than other companies in the sector. Growth investing generally involves more fluctuation partially due to the higher P/E and the inconsistency at times of the earnings. We use predominantly technical analysis but also include fundamental analysis at times.

Covered Call Options

Selling covered call options may limit the portfolio's gain, if any, on the underlying securities, and the client continues to bear the risk of a decline in the value of the underlying stock until the option expires or is closed out.

Risks of Exchange Traded Funds

An ETF may trade at a discount to its net asset value. Investors in the program will indirectly bear fees and expenses charged by the underlying ETFs in which the program, invests in addition to the program's direct fees and expenses. The program will also incur brokerage costs when it purchases shares of ETFs. In addition, the program will be affected by losses of the underlying ETF and the level of risk arising from the investment practices of the underlying ETF.

Risk of Non-Diversification

Non-diversification increases the risk that the value of the account could go down because of the poor performance of a single investment.

We do not believe this investment strategy involves any unusual risks.

Risk of Tactical Investing and Leverage

Due to the nature of tactical investing it can often time increase risk of loss within a portfolio. Tactical investing includes moving in and out of markets based on market movements and other indicators. Our tactical portfolios also use leveraged and inverse funds which create additional risks. When using leveraged funds the risk of loss can be greater than 2x the loss of the index that is represented by the fund of ETF. We also will use short funds or inverse funds when we think markets are going to go down. Should we take a position opposite of what the market does there could be substantial losses incurred. Generally, however, our tactical portfolios seek to reduce risk by avoiding adverse market movements by moving to a cash/money market position. The risk of missing positive returns by being in cash/money market positions also exists. This would be referred to as lost opportunity cost and is a real risk with any tactical investment strategy.

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Independent Solutions Wealth Management, LLC or the integrity of Independent Solutions Wealth Management, LLC's management. Independent Solutions Wealth Management, LLC has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Other Business Activities

Two of ISWM's partners, Mike Lomas and Glenn Wiggle, are also engaged in a business called the Financial Guys, LLC. The Financial Guys, LLC is a radio show in which the partners discuss various aspects of the financial services industry.

Mr. Lomas and Mr. Wiggle are also registered representatives of NEXT Financial Group Inc., a broker-dealer, and, as such, are actively engaged in selling brokerage products and insurance to

clients. When clients use NEXT to purchase or sell securities, clients will incur commissions, fees, and charges which are not part of our firm's advisory fees. These additional sources of compensation to our partners and representatives create a conflict of interest, which you should carefully consider in determining to implement our advice. As described above, we may reduce our advisory fees in consideration of these individuals receiving commissions and transaction-based compensation to mitigate these conflicts. We would be happy to discuss our compensation and the related conflicts of interests with you.

Further, Glenn Wiggle and Mike Lomas are also Investment Advisor Representatives of NEXT Financial Group's Registered Investment Advisor. As such they may use NEXT's advisory services or those of Independent Solutions, when acting in this capacity the clients will be charged by the appropriate firm.

Glenn Wiggle and Mike Lomas are also stockholders in NEXT's parent company, NEXT Financial Holdings Inc. Mr. Wiggle and Mr. Lomas own less than 5% of the shares of the company. As such, Mr. Wiggle and Mr. Lomas benefit as stockholders from securities transactions that are executed through NEXT's brokerage.

Harvey Neiman is an Attorney at Law, licensed in the State of California, although he does not actively practice law. From time to time, however, he receives fees for legal consultation and/or document drafting, as an outside business activity.

Other Financial Industry Activities or Affiliations

As previously stated above, some associated persons of ISWM have ownership interests in Neiman Funds Management LLC ("NFM"), a registered investment advisor.

Item 11 – Code of Ethics

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Independent Solutions will not interfere with making decisions in the best interest of advisory clients and implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of our clients.

We have adopted a Code of Ethics that sets forth the standards of conduct expected of our associated persons and requires compliance with applicable securities laws. Our Code contains written policies reasonably designed to prevent the unlawful use of material non-public information by us or any of our associated persons. It also requires that certain of our personnel (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings. All employees are required to annually review the Code of Ethics and sign an acknowledgement recognizing the principles stated in the Code. You may contact us to request a copy of our Code of Ethics.

If you separately engage one of our principals or representatives to purchase or sell a security or insurance, you will be informed that they will receive compensation and that the receipt of this compensation may create a conflict of interest. We do not, however, permit the purchase or sale of a security in a transaction made directly between a client and any person related to our firm.

Our principals and representatives will often own the same securities recommended to our clients. Generally, these securities will be shares of open ended mutual funds or stocks and bonds actively traded on a national securities exchange or market where the time and size of their purchases or sales will not affect transactions for our clients. If we do recommend the purchase or sale of a thinly traded security to a client, we will ensure that their transactions do not adversely affect clients nor improperly benefit our principals and representatives, typically by completing their transactions after all client transactions have been made. Orders for clients and orders for our own accounts may sometimes be aggregated or “batched” into one large order in accordance with our trade aggregation and allocation policy (described in connection with our brokerage placement practices below). Aggregated orders may achieve better execution for all participating accounts and those benefits will be fairly allocated among all participating accounts.

Unless specifically permitted in our Code of Ethics, none of our Access Persons may effect for themselves or for their immediate family (i.e., spouse, minor children, and adults living in the same household as the Access Person) any transactions in a security which is being actively purchased or sold, or is being considered for purchase or sale, on behalf of any of our clients.

When we are purchasing or considering for purchase any security on behalf of a client, no Access Person may effect a transaction in that security prior to the completion of the purchase or until a decision has been made not to purchase such security. Similarly, when we are selling or considering the sale of any security on behalf of a client, no Access Person may effect a transaction in that security prior to the completion of the sale or until a decision has been made not to sell such security. These requirements are not applicable to: (i) direct obligations of the Government of the United States; (ii) money market instruments, bankers’ acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments, including repurchase agreements; (iii) shares issued by mutual funds or money market funds; and (iv) shares issued by unit investment trusts that are invested exclusively in one or more mutual funds.

Item 12 – Brokerage Practices

We generally recommend that clients use Fidelity Investments Institutional Wealth Services (“Fidelity Investments” or “Fidelity”) or Schwab Institutional (“Schwab”) for our portfolio management services. Factors which we consider in recommending Fidelity, Schwab or any other broker-dealer, to clients include their respective financial strength, reputation, execution, pricing, research, and service. Fidelity enables us to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commission and/or transaction fees charged by Fidelity and Schwab may be higher or lower than those charged by other broker-dealers.

Schwab and Fidelity also make available to our Firm other products and services that benefit ISWM but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab or Fidelity.

Schwab and Fidelity's products and services that assist us in managing and administering our 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 our fees from clients' accounts; and/or
- v. assist with back-office functions, recordkeeping and client reporting.

Schwab and Fidelity also offer other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and/or
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab and Fidelity may make available, arrange and/or pay third-party vendors for the types of services rendered to ISWM. They may also discount or waive fees they 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 ISWM. They may provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at Schwab or Fidelity, we 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 we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab and Fidelity, which may create a potential conflict of interest.

The commissions paid by our clients will comply with our duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where we determine, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client transactions.

A client may direct us in writing to use a particular broker-dealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to our duty of best execution, we may decline a client's request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Item 13 – Review of Accounts

Reviews

The frequency and triggering factors for internal account reviews depend upon the services engaged by a client. For our investment management services, account reviews are conducted on a regular basis, not less than quarterly, and reviews may be triggered by market or economic news or events. Reviews may involve the entire account or just specific securities held in the account. A review may be triggered based on new personal or financial information provided by the client.

For our clients using portfolio management services, we conduct reviews as requested by the client but the reviews may also occur at the time of significant new deposits or withdrawals, during substantial changes in market conditions, at our discretion, or according to the interval agreed upon at the time of engagement. Clients are obligated to contact us when there exists a real or potential change in the client's financial condition so we can review the portfolio along with the clients' new information so we can ensure the investment strategies continue to be appropriate.

Reviewers

The securities within the client's account will be reviewed by our principals. Responsibility for reviews is shared equally by the principals of our Firm.

For clients using our portfolio management services, portfolio position statements are sent monthly, quarterly, semi-annually, or annually, depending on the particular account and the account's custodian. These statements include the valuation of each security in the account. We offer optional performance reports which, if selected, will be specified in our client services agreement. When available, reports may be delivered via e-mail upon request.

Clients may also receive periodic statements of their accounts from their account custodians. The frequency of custodians' statements varies, but is typically monthly or quarterly.

For clients using our financial planning and consulting services, reports are provided upon completion of the project.

Item 14 – Client Referrals and Other Compensation

We may engage solicitors to market our services. If we do so, the client will receive a separate solicitor's disclosure brochure describing our solicitation arrangements, the compensation we pay to the solicitor, and the terms of that relationship. The client will also receive a copy of the

Form ADV Part 2A, as our disclosure brochure. If the solicitor refers a client to us, the client's total advisory fees will be based, in part, on the amount of the solicitation fee we pay to the solicitor. These clients may be paying more than our other clients for the same advisory services depending upon the amount of the client's advisory fees paid to the solicitor.

As part of our marketing effort, we regularly provide additional training and education to our selected solicitors in due diligence, compliance and the technical aspects of our products and services which are valuable to their business. This training, including the travel, lodging and food expenses connected with such training, and is provided by us at no cost to the participating solicitors. Also, as part of our marketing effort, we may also pay to attend conferences and/or symposiums sponsored by broker-dealer firms who refer us business. The cost of the training, education, conferences and/or symposium sponsorships is paid out of our portion of the advisory fees and is not an additional expense to clients or any other investor. We do not believe that such arrangements influence the individual solicitors of the broker-dealer firms to refer business to us or to other advisors with whom the broker-dealer may have similar agreements.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Independent Solutions urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Under our Investment Management Agreements, clients grant us the discretion to manage their accounts. This includes authority to choose the securities and amounts to buy and sell for their accounts. We are not permitted to transfer funds or securities to or from any account other than in the client's name unless specifically directed by a client in writing. There are other limitations on our authority as stated in the contract. When selecting securities and determining amounts, Independent Solutions observes the investment policies, limitations and restrictions of the clients for which it advises. Client-directed investment guidelines and restrictions must be provided to the advisor in writing.

Item 17 – Voting Client Securities

The advisor will have the authority to vote proxies on behalf of its clients and will strive to vote proxies in the best interests. The advisor's policy is generally to vote all proxies from a specific issuer the same way for each client absent reasonable restrictions from a client. The advisor will consider the impact on shareholder value and the issuer's business practices when making voting decisions.

The advisor will generally vote in favor of routine proposals that may include but are not limited to the selection of auditors and election of directors, absent conflicts of interests that are not adequately addressed. The advisor will generally vote against poison proposals (staggered

boards, special voting shares, etc.) and other techniques that concentrate power or may cause management or board entrenchment.

The advisor maintains written policies and procedures, records of proxy votes and information regarding the manner in which a client's proxies were voted is available to the client upon request. Clients may make their request by telephone by calling 716-568-8566 or by email at gwiggle@iswealthmanagement.com.

Item 18 – Financial Information

Independent Solutions is required in this Item to provide you with specific financial information or disclosures about the Firm's financial condition. At this time, the Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Independent Solutions Wealth Management, LLC

6631 Main Street, Williamsville, NY 14221

(716) 568-8566

**Brochure Supplement
(Part 2B of Form ADV)**

At this time, Independent Solutions Wealth Management, LLC is managed through the concerted efforts of its co-owners, Glenn Wiggle, Michael Lomas, Daniel Neiman and Harvey Neiman. Mr. Wiggle serves as ISWM's Chief Compliance Officer and Anti-Money Laundering Officer, responsible for the day-to-day supervision of the Firm's advisory activities. Mr. Wiggle, Mr. Lomas and Mr. Daniel Neiman serve as the Firm's Investment Advisor Representatives in conducting its advisory business. This Brochure Supplement provides information specific to the Firm's Investment Advisor Representatives in addition to that provided in the preceding Part 2A Disclosure Document, which you should have received a copy of. If not, please contact Mr. Wiggle at (716) 568-8566 or gwiggle@iswealthmanagement.com to receive one or if you have any questions about the contents of the Disclosure Document or this Brochure Supplement. Additional information about Mr. Wiggle, Mr. Lomas and Mr. Daniel Neiman is available on the SEC's website at www.adviserinfo.sec.gov.

September 1, 2013

Glenn Wiggle

Educational Background and Business Experience

Glenn Wiggle was born in 1972 and graduated from Michigan State University in East Lansing, Michigan with a Bachelor of Arts degree in Finance. Mr. Wiggle is currently a Principal of our Firm and has served as the Chief Compliance Officer since 2008. Since 2000, Mr. Wiggle has also been a Registered Representative of Next Financial Group, Inc.

Mr. Wiggle is a founder and partner of The Financial Guys LLC, which has served individual client financial needs in the Western New York community through its 20+ team of Investment Professionals since 2000. In conjunction with this role, Mr. Wiggle has been the co-host of the *Financial Guys Radio Program* heard on am930 WBEN since 2000.

Mr. Wiggle is also a Partner in Neiman Funds Management LLC which is the advisor to the Neiman Funds family of mutual funds. Neiman Funds Management LLC was formed in 2009 and Mr. Wiggle has served as its Chief Compliance Officer since inception.

Disciplinary Information

No information relating to Mr. Wiggle is applicable to this Item.

Other Business Activities

As a Registered Representative of NEXT Financial Group, Inc., Mr. Wiggle may sell investment and insurance products to the ISWM's clients and receive a commission from the sale. He is also a licensed insurance agent and may sell life and health insurance products to our clients for a commission.

Through the Financial Guys LLC, Mr. Wiggle receives compensation for advertising on his radio show, the Financial Guys radio program, which has been on the air on WBEN since 2000.

Mr. Wiggle is also a partner in Neiman Funds Management LLC, a Registered Investment Advisor and the advisor to the Neiman Family of Funds. As a partner he may receive compensation when these funds are purchased by clients as part of their Independent Solutions investment portfolio.

These additional sources of compensation may create a conflict of interest as previously described in our Firm's ADV Part 2A Brochure.

Additional Compensation

We must inform you of additional compensation that our supervised persons may receive for providing advisory services, such as sales awards or other prizes. Our supervised persons do not receive any such compensation.

Supervision

We supervise our members in several ways. On a monthly basis we review transaction blotters for each portfolio. We review and compare the blotters to the individual statements of our supervised persons to make sure their trades are in accordance with our Code of Ethics. We also review and compare the transaction blotters to a sampling of client account statements to make sure their respective portfolio models are being followed properly.

Our Firm also utilizes an outside compliance consulting firm, Compass Compliance Consulting LLC, to conduct periodic reviews of the Firm's compliance program. For questions regarding the supervision of Mr. Wiggle, please contact Michael Lomas at 716-568-8566. For questions regarding the supervision of Mr. Lomas, Mr. Daniel Neiman or Mr. Harvey Neiman, please contact Mr. Wiggle at 716-568-8566.

Michael Lomas

Educational Background and Business Experience

Michael Lomas was born in 1974 and graduated from Hilbert College in Hamburg, New York with a Bachelor of Arts degree in Business Finance. Mr. Lomas is currently the President and a Principal of ISWM. Since January of 2000 Mr. Lomas has been a Registered Representative of Next Financial Group, Inc.

Mr. Lomas is a co-founder and partner of The Financial Guys LLC, which has served individual client financial needs in the Western New York community through its 20+ team of Investment Professionals since 2000.

Mr. Lomas is also a Partner in Neiman Funds Management LLC, which is the advisor to the Neiman Funds family of mutual funds. Neiman Funds Management LLC was formed in 2009 and Mr. Lomas also serves as a Director on the Board of Directors for the Neiman Funds.

Disciplinary Information

No information relating to Mr. Lomas is applicable to this Item.

Other Business Activities

As a Registered Representative of NEXT Financial Group, Inc., Mr. Lomas may sell investment and insurance products to the ISWM's clients and receive a commission from the sale. He is also a licensed insurance agent and may sell life and health insurance products to our clients for a commission.

Through the Financial Guys LLC, Mr. Lomas receives compensation for advertising on his radio show, The Financial Guys radio program, which has been on the air on WBEN since 2000.

Mr. Lomas is also a partner in Neiman Funds Management LLC, a Registered Investment

Advisor and the advisor to the Neiman Family of Funds. As a partner he may receive compensation when these funds are purchased by clients as part of their Independent Solutions investment portfolio.

These additional sources of compensation may create a conflict of interest as previously described in our Firm's ADV Part 2A Brochure.

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Our Firm also utilizes an outside compliance consulting firm, Compass Compliance Consulting LLC, to conduct periodic reviews of the Firm's compliance program. For questions regarding the supervision of Mr. Lomas, please contact Mr. Wiggle at 716-568-8566.

Daniel Neiman

Educational Background and Business Experience

Daniel Neiman is a native of La Jolla, California and was born in 1977. He graduated from Humboldt State University with a Bachelor of Science degree in Finance in 1999. He has studied investments and the markets since the mid 1990's and has managed investments professionally since 1999. Mr. Neiman is currently the portfolio manager for Neiman Large Cap Value Mutual Fund and Neiman Balanced Allocation Fund within the Neiman Family of Funds.

From 1999 to 2009, Mr. Neiman managed separate discretionary stock accounts for Neiman Capital Management LLC and served as Chief Compliance Officer for Neiman Funds from 2003 to the present. Since 2009, Mr. Neiman has also managed stock accounts at Independent Solutions.

Disciplinary Information

No information relating to Mr. Lomas is applicable to this Item.

Other Business Activities

Mr. Neiman is also a partner in Neiman Funds Management LLC, a Registered Investment

Advisor and the advisor to the Neiman Family of Funds, as well as co-portfolio manager for Neiman Large Cap Value Fund. As a partner he may receive compensation when these funds are purchased by clients as part of their Independent Solutions investment portfolio.

Mr. Neiman is the Chief Compliance Officer for the Neiman funds and as such receives compensation quarterly for each fund as approved by the Board of Trustees for the fund.

Additional Compensation

We must inform you of additional compensation that our supervised persons may receive for providing advisory services, such as sales awards or other prizes. Our supervised persons do not receive any such compensation.

Supervision

We supervise our members in several ways. On a monthly basis we review transaction blotters for each portfolio. We review and compare the blotters to the individual statements of our supervised persons to make sure their trades are in accordance with our Code of Ethics. We also review and compare the transaction blotters to a sampling of client account statements to make sure their respective portfolio models are being followed properly.

Our Firm also utilizes an outside compliance consulting firm, Compass Compliance Consulting LLC, to conduct periodic reviews of the Firm's compliance program. For questions regarding the supervision of Mr. Neiman, please contact Mr. Wiggle at 716-568-8566.