

Item 1 – Cover Page

**Waller Financial Planning Group, Inc.**  
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**Columbus, OH 43221**  
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**www.waller.com**

**April 11, 2013**

**This brochure provides information about the qualifications and business practices of Waller Financial Planning Group, Inc. If you have any questions about the contents of this Brochure, please contact Tiffany Shively at (614) 457-7026 and/or [tshively@waller.com](mailto:tshively@waller.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Waller Financial Planning Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Waller Financial Planning Group, Inc. is 159564.**

**Any references to Waller Financial Planning Group, Inc. as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

## **Item 2 - MATERIAL CHANGES**

At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

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The material changes discussed above are only those changes that have been made to this brochure since the firm's last annual update of the brochure. The date of the last annual update of the brochure was January 10, 2012.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing disclosure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Tiffany Shively at (614) 457-7026 and/or [tshively@waller.com](mailto:tshively@waller.com). Additional information about Waller Financial Planning Group, Inc. is also available via the SEC's website [www.adviser.sec.gov](http://www.adviser.sec.gov). The website also provides information about any persons affiliated with Waller Financial Planning Group, Inc. who are registered, or are required to be registered, as investment adviser representatives of Waller Financial Planning Group, Inc.

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#### **Item 4 - ADVISORY BUSINESS**

Waller Financial Planning Group, Inc. (hereinafter referred to as “WFPG”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. WFPG was founded in December 1985 by Larry Waller. October 2011, WFPG changed ownership. WFPG is owned equally by Charles A. Kerwood, III, Shareholder, Jason A. Eliason, Shareholder, Jason E. Farris, Shareholder, and Christopher O. Olsgard, Shareholder.
- B. WFPG offers the following advisory services. Each of the services is more fully described below.
  - Investment Management
  - Financial Planning
- C. WFPG tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

WFPG will gather information about you and your financial situation through meetings and completion of a fact finder or data gathering questionnaire. The information gathered by WFPG will assist WFPG to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, WFPG will gather various financial information and history from you including, but not limited to:

- ☐ Copies of documents such as wills, trusts, insurance policies, etc.
- ☐ Retirement and financial goals
- ☐ Investment objectives
- ☐ Investment horizon
- ☐ Financial needs
- ☐ Cash flow analysis
- ☐ Cost of living needs
- ☐ Education needs
- ☐ Savings tendencies
- ☐ Other applicable financial information required by WFPG in order to provide the investment advisory services requested.

The planning process combines the development of a comprehensive financial plan with a conservative, long-term investment management strategy. Beginning with your end goals in mind, this process requires you to look intensively at your financial history and present situation to align properly with your personal and professional aspirations.

The Waller Financial Planning Process is conducted in two phases: financial plan development and long-term investment management. Waller Financial provides each client with a cross-functional team with the necessary expertise to provide guidance through both phases.

- D. WFPG does not participate in wrap fee programs.

- E. As of December 31, 2012, WFPG has approximately \$270,830,800 million of client assets under our discretionary management. WFPG does not have assets under its management on a nondiscretionary basis.

### **Investment Management Services**

WFPG customizes your portfolio allocation taking into consideration your limitations or restrictions, the market and economy at the time and your financial situation, goals and objectives.

WFPG maintains an Approved Bond Mutual Fund List and an Approved Equity Mutual Fund List. Your Advisory Representative will construct your asset allocation using securities from the approved lists.

WFPG will provide continuous and ongoing discretionary management of your account. Unless otherwise expressly requested by you, WFPG will manage the account on a discretionary basis and make changes to the allocation as deemed appropriate by WFPG. WFPG will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. WFPG may actively trade securities and hold such securities for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to WFPG by execution of the Asset Management agreement.

If you who choose to have accounts managed on a nondiscretionary basis, you are advised nondiscretionary accounts are subject to certain risks. Risks may include but not be limited to the risk of missing market opportunities or the risk of the Advisory Representative not being able to move out of the market in a timely manner until client's prior authorization has been obtained before any buy, sell or exchange. Therefore, the performance of nondiscretionary accounts may fluctuate from those accounts managed on a discretionary basis. WFPG primarily uses open-ended mutual funds and uses no-load and load waived or mutual funds purchased at net asset value (NAV).

You are advised of transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

### **Financial Planning Services**

WFPG will typically provide service on matters concerning estate and retirement planning, employee benefit planning, insurance plans, securities, tax shelters, and capital accumulation methods. WFPG may also advise on income, gift and estate taxes as well as advise regarding the purchase, sale or disposition of insurance or assets other than securities or investments.

You will receive a written financial plan as well as periodic reviews for the first year (generally two to four times per year).

Plans and advice are based on your financial situation at the time and are based on financial information disclosed by you to WFPG. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. WFPG cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify WFPG promptly of the changes. You are advised that the advice offered by WFPG may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through WFPG or Advisory Representatives. Should you implement the plan with WFPG's Advisory Representatives commissions or other compensation may be received in addition to the advisory fee paid to WFPG.

### **General Information**

You are advised the investment recommendations and advice offered by WFPG are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform WFPG promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify WFPG of any such changes could result in investment recommendations not meeting your needs.

## **Item 5 - FEES AND COMPENSATION**

### **Investment Management Services**

- A. Fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds or any portion of the funds.

No fee adjustments will be made for Account appreciation or depreciation. Further, no fee adjustments will be made for additional deposits to the account or partial withdrawals from the account during a billing period.

The minimum fee for investment management is \$5,000.

Your Investment Management Fee will be adjusted either annually or quarterly as agreed upon between you and your Advisory Representative. Details of the frequency of your fee adjustment will be outlined in your advisory agreement with WFPG. A client's fee is typically based on the value of all assets within the household under management. However, under certain circumstances not all assets will be charged a fee based on the household value. Such

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circumstances include clients who keep assets separate, accounts that came under management at different times and multiple family assets.

<b>Base Portfolio</b>	<b>Base Fee</b>	<b>Plus % of Excess</b>
\$0	0	1.35%
\$250,000	\$3,375	0.95%
\$500,000	\$5,750	0.85%
\$750,000	\$7,875	0.75%
\$1,000,000	\$9,750	0.70%
\$2,000,000	\$16,750	0.60%
\$3,000,000	\$22,750	0.50%
\$4,000,000	\$27,750	0.40%

WFPG may change the above fee schedule upon 30-days prior written notice to you.

- B. Advisory fees will generally be collected directly from your account, provided you have given WFPG written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, WFPG has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to WFPG, except for ERISA and IRA accounts.
- C. The above is fee which includes WFPG's advisory fee. WFPG will pay any transaction charges as a result of transactions conducted in the client's account. Several funds are available at no transaction fees. Consequently, there is an incentive for WFPG to utilize funds with no transaction fees in an effort to reduce WFPG's costs. Further, certain funds have short term trading fees assessed in the event the fund is purchased and sold in a short term period (typically 60 to 90 days, but differs with funds). WFPG will offset or reduce its advisory fee by any short term trading fees that may be assessed to the client. In addition to the advisory fees above, you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by WFPG but rather by the product, broker/dealer or account custodian. WFPG does not share in any portion of such fees. However, if you renew each year the advisory fees will be offset by net commissions from 12(b)1 fees received by associates of WFPG. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with WFPG and are compensation to the fund-manager.
- D. Advisory fees will be charged in advance of a quarterly billing period (every three months). The quarterly advisory fee will be based on the value of the Account on the last business day of the just completed quarterly billing period. Fees for partial period will be prorated. The initial quarterly fee will be a pro-rated portion of the fee based on the number of days remaining in quarterly billing period. The initial fee will be calculated based upon the value of the account upon establishment.

Termination Provisions

## Waller Financial Planning Group, Inc.

You may terminate investment advisory services obtained from WFPG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with WFPG. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as account maintenance or custodial fees. Thereafter, you may terminate investment advisory services Upon WFPG's receipt of your written notice to terminate. Should you terminate investment advisory services during a quarterly billing period, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the quarterly billing period.

- E. You are advised Advisory Representatives of WFPG are dually registered representatives of LPL, a registered broker/dealer, member of the Financial Industry Regulatory Authority (FINRA) and SIPC. Advisory Representatives of WFPG who are Registered Representatives may receive trail commissions (i.e. 12(b)1 fees) for a period of time as a result of directing securities transactions through LPL. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12(b)1 fees. 12(b)1 fees come from fund assets, therefore, indirectly from your assets. 12(b)1 fees may be initially paid to LPL and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the Advisory Representatives to recommend funds with 12(b)1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest.

As stated above, WFPG recommends mutual funds that pay 12(b)1 fees and no-load funds.

You may purchase the securities recommended by WFPG directly or through other brokers or agents not affiliated with WFPG.

WFPG will offset your investment management fees by any net commissions and/or 12(b)1 fees received by the Advisory Representative.

### **Financial Planning Services**

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with WFPG, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

The minimum hourly rate for financial planning advice is \$150.

The Financial Planning Fee Component is the greater of the Income Component or the Business Component.



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### Income Component

The greater of the minimum fee of \$2,500 or 1% of salary, self-employed income, pensions, and social security.

### Business Component

The greater of the minimum fee of \$2,500 or the fee based on the following fee schedule.

<b>Small Business Sales</b>	<b>Fee</b>
\$0 - \$1,000,000	\$2,500
\$1,000,000 - \$5,000,000	\$5,000
\$5,000,000 - \$10,000,000	\$10,000
\$10,000,000 - \$15,000,000	\$15,000
\$15,000,000 - \$30,000,000	\$20,000
Over \$30,000,000	Negotiable

### Termination Provisions

You may terminate advisory services obtained from WFPG, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with WFPG. Thereafter, you may terminate investment advisory services with 30 days written notice to WFPG. You will be responsible for any time spent by WFPG.

## **Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT**

This section is not applicable to WFPG since WFPG does not charge performance based fees.

## **Item 7 - TYPES OF CLIENTS**

WFPG's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth as well as pension and profit sharing plans and charitable organizations.

WFPG requires minimum fees for financial planning and investment management services. You are advised the minimum fees in relation to your account size may be deemed excessive. You may obtain similar services from another investment adviser at a lower cost.

Financial Planning Minimum Fee	\$2,500
Investment Management Minimum Fee	\$5,000

WFPG generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining Investment Management Services. WFPG will generally require you to deposit a minimum of \$500,000 (cash or securities). However, under certain circumstances, WFPG may waive the minimum account size requirement and accept accounts less than \$500,000. Such circumstances may include but not be limited to additional assets will soon be deposited or you have other accounts under management with WFPG. You are advised performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised.

**Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

- A. WFPG conducts economic analysis and attempts to analyze and determine the trends. Additionally, WFPG uses data from various sources, on a subscription basis, such as Morningstar for mutual fund screening on a quarterly basis. These sources may use fundamental and technical analysis in their research. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns.
- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by WFPG will require you to be prepared to bear the risk of loss and fluctuating performance.

WFPG does not represent, warrant or imply that the services or methods of analysis used by WFPG can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by WFPG will provide a better return than other investment strategies.

- C. WFPG primarily uses mutual funds. The risks with mutual funds include:
- Manager Risk: which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
  - Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
  - Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
  - Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

These are some of the primary risks associated with the way we recommend investments to you. Please do not hesitate to contact us to discuss these risks and others in more detail. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time WFPG will direct the client to the appropriate Web page to access the prospectus.

## **Item 9 - DISCIPLINARY INFORMATION**

Neither WFPG nor its management has ever been subject to any disciplinary action.

## **Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

- A. As previously stated, Advisory Representatives are dually registered as advisory representatives of WFPG and as registered representatives of LPL. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at LPL than at other broker/dealers. Advisory Representatives may have a conflict of interest when having you purchase securities and/or insurance related products through LPL in that the higher their production with LPL the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of the FINRA, LPL has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of LPL. For such supervisory functions, WFPG may pay LPL a portion of the advisory fees they receive. LPL and WFPG are not affiliated.

- B, C. Waller Financial Services, Inc. is a licensed insurance agency. Clients are under no obligation to purchase insurance products through Waller Financial Services, Inc. However, if a client elects to purchase insurance products, commissions will be received.

WFPG is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, WFPG is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

WFPG attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as registered representatives with LPL, Advisory Representatives are subject to a supervisory structure at LPL for their securities business.

## **Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code Of Ethics**

- A. WFPG has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. WFPG takes seriously its compliance and regulatory obligations and

requires all staff to comply with such rules and regulations as well as WFPG's policies and procedures. Further, WFPG strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with WFPG's Privacy Policy. As such, WFPG maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, WFPG's Code of Ethics establishes WFPG's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

- B. Neither WFPG nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. WFPG and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, WFPG and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. WFPG and its associated persons will not put their interests before your interest. WFPG and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. WFPG is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

#### **Prohibition on Use of Insider Information**

WFPG has adopted policies and procedures to prevent the misuse of "insider" information (i.e. material non-public information). A copy of such policies and procedures is available to any person upon request.

#### **Item 12 - BROKERAGE PRACTICES**

As previously stated, Advisory Representatives are registered representatives of LPL. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from LPL unless LPL provides them with written authorization.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by WFPG will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from WFPG.

In initially selecting LPL, WFPG conducted due diligence. WFPG's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to WFPG
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

Additionally, periodically WFPG will review transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

You are advised there is an incentive for WFPG and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

LPL has a wide range of approved securities products for which LPL performs due diligence prior to selection. LPL's registered representatives are required to adhere to these products when implementing securities transactions through LPL. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. LPL also provides Advisory Representatives, and therefore the WFPG, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and WFPG manage and further develop its business enterprise.

LPL also make available to WFPG other products and services that benefit WFPG but may not directly benefit you. Some of these other products and services assist WFPG with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of WFPG's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of WFPG's accounts, including accounts not held through LPL.

Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

### **Item 13 - REVIEW OF ACCOUNTS**

- A. If you are participating in the Investment Management Services you will be invited to participate in at least an annual review. The frequency of reviews will be determined and agreed to between you and your Advisory Representative. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

If you are participating in Financial Planning Services you will receive regular plan reviews (generally one to four times per year). Other than the initial plan or analysis, there will be no other reports issued.

The following individuals participate in the review of clients' accounts:

- Charles A. Kerwood, III, Shareholder, Chief Compliance Officer, Advisory Representative
  - Jason A. Eliason, Shareholder, Advisory Representative
  - Jason E. Farris, Shareholder, Advisory Representative
  - Christopher O. Olsgard, Shareholder, Advisory Representative
  - Scott E. Rendle, Advisory Representative
  - Katherine E. Kincaid, Advisory Representative
- B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.
- C. You will be provided statements at least quarterly directly from the account custodian. Additionally, you will receive confirmations of all transactions occurring directly from the account custodian.

### **Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

- A. Product vendors recommended by WFPG may provide monetary and non-monetary assistance with client events, provide educational tools and resources. WFPG does not select products as a result of any monetary or non-monetary assistance. The selection of client appropriate product is first and foremost. WFPG's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and WFPG.
- B. WFPG may compensate a person who is not a supervised person of WFPG for referrals. All applicable federal and state laws will be observed. All clients referred by solicitors will be given full written disclosure describing the terms and fee arrangements between WFPG and the solicitor.

### **Item 15 - CUSTODY**

With the exception of deduction of WFPG's advisory fees from your accounts, WFPG does not take custody of your funds or securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

### **Item 16 - INVESTMENT DISCRETION**

You may grant WFPG authorization to manage your account on a discretionary basis. Discretionary authority will give WFPG the authority to buy, sell, exchange and convert securities in your managed accounts. You will grant such authority to WFPG by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by WFPG.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) WFPG requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of WFPG's advisory fees from the account, if you have authorized automatic deductions, WFPG will not have the ability to withdraw your funds or securities from the account.

### **Item 17 - VOTING CLIENT SECURITIES**

WFPG does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact WFPG about questions and our opinions on how to vote proxies. However, the voting and how you vote the proxies is solely your decision.

### **Item 18 - FINANCIAL INFORMATION**

- A. WFPG will not require you to prepay more than six or more months in advance of receiving the advisory service.

- B. As stated above, WFPG has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of WFPG's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contractual commitment to you or any other client.
- C. Neither WFPG nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

**Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS**

This section is not applicable to WFPG. WFPG is not state registered. WFPG is registered with the Securities and Exchange Commission.