

WILLS FINANCIAL GROUP

REGISTERED INVESTMENT ADVISOR

BROCHURE Form ADV Part 2A

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March 31, 2015

This Brochure offers information about the qualifications, business practices, and fiduciary responsibilities of Wills Financial Group, Inc. (WFG, we, us, our.) This Brochure is designed to provide new, prospective, and existing clients with a clearly written narrative and disclosure of our business practices, conflicts of interest, and background of our company and its employees. Questions about the contents of this Brochure can be raised with us at 804-330-3100, or info@willsfg.com. Please note that the information in this Brochure has not been approved or verified by either the SEC or any state securities authority. Our use of the term "registered investment advisor" does not imply a certain level of skill or training. Additional information about Wills Financial Group is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

Our business activities have not changed materially since last year's Annual amendment filing on March 20th, 2014.

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Item 4 – Advisory Business

Wills Financial Group is a SEC-registered investment advisor established in 1989 under the Investors Advisors Act of 1940. The business was incorporated in 1999 with Janet Wills as the principal owner.

We provide fee-based investment advisory services on a discretionary basis, and to the extent specifically requested by a client, financial planning and related consulting services. Our firm's financial and investment services are enhanced by the initial discussions and with regular on-going meetings we hold with our clients on their financial status, future goals and needs.

A thorough understanding of our clients' financial situation and future needs allows us to better provide financial analysis, advice, and appropriate investments. With an understanding of clients' investment objectives, financial status and goals, investment horizon, risk tolerance, liquidity needs, and general tax considerations, we determine appropriate investment allocations. Occasionally we may present opportunities to clients the option of investing in private placement opportunities.

We do not sell annuities, insurance stocks, bonds, mutual funds, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder's fees are accepted. We do not manage or act as a sub-adviser for any mutual funds.

We do not act as a custodian of client assets. The client maintains asset control, through asset custodians. Under the Investment Advisors Act of 1940, we owe our clients certain fiduciary duties. Our clients give discretionary authority to make trades in client accounts under a limited power of attorney.

Portfolios are reviewed on an ongoing, continuous basis.

Wrap Fee Programs. WFG does not participate in wrap fee programs.

Client Assets. As of March 27, 2015, Wills Financial Group manages \$171,219,124 on a discretionary basis which represents all assets we manage.

Item 5 – Fees and Compensation

Compensation. WFG charges asset based management fees which are charged quarterly in arrears based on a percentage of the client's assets under management at the end of the previous calendar quarter. The compensation for our services, which include identifying a client's investment objectives and restrictions, developing and implementing investment recommendations, monitoring a client's investment results, and reporting to the client on a quarterly basis, is as follows:

WFG FEESCHEDULE

1.0 percent on the first \$2,000,000 (\$0 to \$2,000,000)
0.8 percent on the next \$2,000,000 (\$2,000,001 to \$4,000,000)
0.7 percent on the next \$2,000,000 (\$4,000,001 to \$6,000,000)
0.4 percent on additional amounts (negotiable)

Under special circumstances, such as the "house holding" of accounts for clients with multiple family members or entities, or other alternative arrangements, Wills Financial Group negotiates the amount of the fee. Wills Financial Group determines the negotiated fee based upon a number of factors including the amount of work involved, the assets placed under management and the attention needed to manage the account.

Fees are not independently calculated by the custodian but will be reflected in the custodian's monthly statement. If our services are terminated before the end of a calendar quarter, we bill client only for that portion of the previous quarter that we managed client's investments.

Hourly Fees: Our asset management fee is generally inclusive of any and all financial advice for clients; for any financial research and advice for clients that require excessive time, we may charge a separate fee. These services are negotiated with each client and are billed on an hourly basis. Our hourly rate is as follows:

Back Office Support	\$150/Hour
Management	\$200 - \$300/Hour

Other fees: The custodians for our clients' various assets and securities, including cash equivalents, may charge various custodian, transaction or other fees for maintaining client accounts. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to WFG's fee, and WFG does not receive any portion of these commissions, fees, and costs. We do not charge any fees other than the asset based fees referenced above.

Please note that Item 12 further describes the factors that WFG considers in selecting or recommending a broker/dealer for client transactions and determining

the reasonableness of their compensation (e.g., commissions).

Neither WFG nor any of its staff receives compensation for the purchase of any investment product for client accounts. We receive no service fees or compensation for the purchase of any mutual fund for client accounts. If WFG were to receive fees or compensation for any investment product, we would separately disclose the situation to any and all clients affected.

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

Wills Financial Group does not charge performance-based fees (compensation to the investment manager as a reward for positive performance and generally a percentage of the profits made on the investments) to its clients, nor do we compensate our staff based on the capital gains or appreciation of client assets. As stated in Item 5 above, client fees for WFG's management services are calculated solely on total assets undermanagement.

Item 7 – Types of Clients

Wills Financial Group provides asset management services for individuals, high net worth individuals, trusts, corporations and other business retirement accounts, and estates. Wills Financial Group does not generally require an annual minimum fee or asset level for investment advisory services. Wills Financial Group, in its sole discretion, may charge a lesser investment management fee based on certain factors, including anticipated future additional assets and/or earning capacity, any related accounts, pre-existing client relationships, and the account composition.

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

Wills Financial Group's utilizes individual equities, bonds, mutual funds and exchange traded funds (ETF's) to invest its client's portfolio. With an understanding of clients' investment objectives, financial status and goals, investment horizon, risk tolerance, liquidity needs, and general tax considerations, we determine appropriate investment allocations. Portfolios are reviewed on an on-going basis. When we determine that a change in the asset allocation model is warranted due to changes in the economic environment, perceived risks or a client's individual situation, we will make changes to the percentage of assets that are allocated to each asset class.

While we believe that our investment strategy focuses on capital preservation which minimizes downside risk, there is always the possibility that financial markets or individual companies whose securities we hold in client accounts may decline in value. All investments involve the risk of loss of principal, a reduction of interest and dividends, and other risks that include market risk, systemic risk, interest rate risk, company or issuer risk, economic conditions' risk, timing risk, and the risk that we will misinterpret investing data or make incorrect assumptions about a security or the market. Our

ongoing monitoring of economic conditions, financial markets, and individual companies' business and financial data, however, assist in diminishing long-term losses.

Other considerations we employ to manage clients' portfolio include:

Fundamental Analysis – an essential part of determining which securities to include in a portfolio comes from attempting to study characteristics of a company. This would include an analysis of financial statements, earnings record, industry competitors and its competitors' advantages. However, understanding the current events of a company does not help us to predict market movements.

Technical Analysis – we look at past market movements of a company in order to develop a key understanding the price patterns a company may have. Technical analysis also includes studying stock charts. Charts are used to identify any upward or downward trends, compare and contrast securities, and determining how long a trend will last. Ultimately, this would help in predicting future price movements.

Asset allocation – following discussions with a client regarding his financial picture, goals, risk tolerance, and income requirements, we construct a portfolio of securities that complements each client's situation. Even with our attention to appropriately allocating a client's portfolio among different asset types, any one type of asset, an industry sector, or an individual security may decline in value due to market conditions, general economic conditions, unforeseen events, United States monetary policy, or individual company situations.

Discipline – by adhering to our investment strategy, we manage client assets through a careful approach to capital preservation. Even though we adhere to our broad investment strategy, client portfolios and individual securities are subject to risk.

Diversification – placement of client assets in a diverse group of securities and industries helps to minimize risk while enhancing long-term rewards. While diversification assists in minimizing risk of loss, client portfolios and individual securities are still subject to different types of risk.

Income tax considerations – while mindful of tax implications when making investing decisions, we believe that tax considerations should not replace economic gain or loss as the primary factor of investment decisions. Even though we consider tax implications and buy and sell securities in client accounts to the best of our ability to maximize the client's overall return, the risks identified above are always present in investment decisions.

While we do not employ an absolute buy and hold strategy, we generally stick with our investments unless we have a compelling reason to sell. This practice gives investments time to work, minimizes brokerage fees for our clients, and avoids taxable events for clients.

Item 9 – Disciplinary Information

Wills Financial Group nor its management personnel have been subject to any legal or disciplinary action.

Item 10 – Other Financial Industry Activities and Affiliations

WFG employees do not have any affiliation, arrangement, activity or relationship within the financial industry, other than with our company. None of our employees are registered or have an application pending to register as a broker/dealer or as a registered representative of a broker/dealer.

WFG employees are not registered nor do they have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

WFG does not recommend or select other investment advisors for our clients where we would receive compensation directly or indirectly from those advisors, a situation that would create a material conflict of interest for WFG.

Item 11 – Code of Ethics

Wills Financial Group has adopted a Code of Ethics pursuant to SEC Rule 204A-1. This Code requires all of our employees to adhere to their fiduciary duty and put the interest of clients ahead of their own interest. An employee's failure to comply with the Code of Ethics contained in our Policies and Procedures Manual is grounds for termination. We will provide a copy of the Code of Ethics or the entire Policies and Procedures manual to any clients or prospective client upon request. Please contact our Chief Compliance Officer at 804-330-3100.

Among other things, our code of ethics addresses the following issues:

- Employees should act with integrity, competence, diligence, respect, and in an ethical manner with the public, clients, prospective clients, or colleagues,
- Employees have a duty of loyalty to their clients and must act with reasonable care and exercise prudent judgment. Employees must act for the benefit of clients and place clients' interests before Wills Financial Group's or their own interests. Employees must deal fairly and objectively with all clients when providing investment analysis, making investment recommendations, taking investment action, or engaging in other professional activities,
- Employees should use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities. Employees must not knowingly make any misrepresentations relating to investment analysis, recommendations, actions, or other professional activities,

- Employees should keep information about current, former, and prospective clients confidential unless (1) the information concerns illegal activities on the part of the client or prospective client, or (2) disclosure is required by law, or (3) the client or prospective client permits disclosure of the information,
- Employees should promote the integrity of, and uphold the rules governing, capital markets. Employees must not engage in practices that distort prices or artificially inflate trading volume with the intent to mislead market participants. Investment transactions for clients must have priority over any personal investment transactions,
- When communicating investment performance information, employees must make reasonable efforts to ensure that it is fair, accurate, and complete.

Personal Trading – Contained in our Policies and Procedures Manual, our Chief compliance officer reviews all employee security trades each quarter (Mutual funds, Money Market Funds, and ETF transactions are not required to be reported.) The Chief Compliance officer's trades are reviewed by Janet Wills. The personal trading reviews ensure that the personal trading of securities by employees does not affect the markets, and that our clients receive preferential treatment. Most employee trades are small individual equities, bonds or mutual fund trades or exchange-traded fund trades.

Employees shall ensure that clients' transactions have priority over transactions in which employees have beneficial interests. Employees shall make every effort to avoid even the appearance of conflict of interest, and shall disclose to the Management Team any conflict of interest.

Employees trading in securities for their own account must comply with the provisions of our Policies and Procedures Manual.

Employees may not participate in Initial Public Offerings (IPO's).

Item 12 – Brokerage Practices

The Custodians and Brokers we Use - Wills Financial Group does not maintain custody of your assets that we manage. Your assets must be maintained in an account at a "qualified custodian", generally a broker-dealer or bank. We request that our clients use Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, as the qualified custodian. When recommending a broker, our firm will attempt to minimize the total cost for all brokerage services paid by the client. However, it may be the case that the recommended broker charges a higher fee for a particular type of service, such as commission rates, than can be obtained from another broker.

Wills Financial Group is independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities

when we instruct them to. You will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we assist you in doing so.

How we Select Brokers/Custodians – As your fiduciary, we seek to select a custodian/broker who will hold your assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others:

- Combination of transaction execution services and asset custody services (generally without a separate custody fee)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds, etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate those prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us From Schwab")

Your Brokerage and Custody Costs - For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How We Select Brokers/Custodian").

Products and Services Available to Us From Schwab - Schwab provides Wills Financial Group and our clients with access to its institutional brokerage - trading, custody, reporting, and related services - many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those

services help us manage or administer our clients' accounts. These services generally are available to independent investment advisers on an unsolicited basis (we don't have to request them), at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us fees for these services.

Services That Benefit You - Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access, or that would require a significantly higher minimum initial investment. Schwab's services described in this paragraph generally benefit you and your account.

Services That May Not Directly Benefit You - Schwab Institutional also makes available to our firm other products and services that benefit Wills Financial Group but may not directly benefit your account(s). These products and services assist us in managing and administering your account(s). They include investment research, both Schwab's own and that of third parties. 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.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

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

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

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Wills Financial Group. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel.

Wills Financial Group uses many of the services Schwab offers, especially their software and technology which permits us to more efficiently manage and administer your accounts.

Our Interest in Schwab's Services - The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How We Select Broker(s)/Custodian") and not Schwab's services that benefit only us. We have more than \$100,000,000 in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab service fees presents a material conflict of interest.

Directed Brokerage - As our firm does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid, clients must direct Wills Financial Group as to the broker-dealer to be used.

Wills Financial Group requests that clients direct us to place trades through Charles Schwab & Co., Inc. (Schwab). Wills Financial Group has evaluated Charles Schwab & Co., Inc. and believes that it will provide our clients with a blend of execution services, commission costs and professionalism that will assist our firm to meet our fiduciary obligations to clients.

We reserve the right to decline acceptance of any client account for which the client directs the use of a broker other than Charles Schwab & Co., Inc. if we believe that this choice would hinder our fiduciary duty to the client and/or our ability to service the account. In directing the use of a particular broker-dealer, it should be understood that we will not have the authority to negotiate commissions among various broker-dealers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct it to use a particular broker-dealer.

Clients should note, while Wills Financial Group has a reasonable belief that Charles Schwab & Co., Inc. is able to obtain best execution and competitive prices, our firm will not be independently seeking best execution price capability through other brokers.

Aggregation of Orders – Wills Financial Group will sometimes make block trades where possible and when advantageous to clients, and is primarily done on the "sell" side when eliminating an entire position from all the portfolios. From time to time we will submit a block trade on the "buy" side. The number of shares ordered is determined by the

number of shares planned for specific accounts that have available cash at the time and the appropriateness of the investment to the client.

When trade aggregation does occur, all participating clients receive an average share price; Charles Schwab & Co., Inc. generally charges the same commission rate or minimum transactions charges for trades placed in a client's account, regardless of whether or not the client's transaction was part of an aggregated trade or not. Charles Schwab's commissions rates may vary from client to client, based upon the amount of assets a client has with Schwab, or as to whether or not the client has elected electronic delivery of their monthly account statements.

Wills Financial Group's block trading policy and procedures are as follows:

- Transactions for any client account may not be aggregated for execution if the practice is prohibited by or inconsistent with the client's advisory agreement with Wills Financial Group
- Wills Financial Group must determine that the purchase or sale of the particular security involved is appropriate for the client and consistent with the client's investment objectives and with any investment guidelines or restrictions applicable to the client's account.
- Wills Financial Group must reasonably believe that the order aggregation will benefit, and will enable us to seek best execution for each client participating in the aggregated order. This requires a good faith judgment at the time the order is placed for the execution. It does not mean that the determination made in advance of the transaction must always prove to have been correct in the light of a "20-20 hindsight" perspective. Best execution includes the duty to seek the best quality of execution, as well as the best net price.
- Generally, each client that participates in the aggregated order must do so at the average price for all separate transactions made to fill the order.
- Wills Financial Group's client account records separately reflect, for each account in which the aggregated transaction occurred, the securities which are held by, and bought and sold for, that account.
- No client or account will be favored over another.
- Wills Financial Group will receive no additional compensation or remuneration of any kind as a result of the aggregation of client trades.

Trade Error Correction Procedures - On infrequent occasions, a trade error may be made in a client account. For example, a security may be erroneously purchased for a client, instead of sold. In these situations, Wills Financial Group generally seeks to rectify the error by placing the client account in a similar position as it would have been had there been no error. Depending on the circumstances, various corrective steps may be taken, including, but not limited to, canceling the trade, adjusting the allocation, and/or reimbursing the account.

Item 13 – Review of Accounts

Periodic Reviews - Our Investment Team manages all accounts. All accounts are monitored on an ongoing basis, both as to the total account and merits of each holding. The Investment Team is authorized to effect all necessary transactions to adjust the investment mix, subject to supervision by Janet Wills.

Security transactions must be suitable for the account in light of the account investment objectives and restrictions. Purchases of securities will be made pursuant to guidelines. The Investment Team are to ensure that all securities transactions are properly recorded. The Investment Team should be familiar with trading activity, investment strategy and restrictions of any client account, or be able to quickly determine such.

The Investment Team is instructed to consider the client's current security positions and the likelihood that the performance of each security, both on an absolute basis and on how it might perform in an overall portfolio context, can contribute to meeting the investment objectives of the client over time.

Account reviews are performed at least quarterly, or more frequently if conditions dictate, along with investment performance calculations, by the Investment Team.

Review Triggers - Other conditions that may trigger a review are changes in the portfolio's risk measurements (such as credit or interest rate risk,) new regulations or laws, new investment information, or changes in a client's investment guidelines or objectives.

Regular Reports - Clients receive written periodic communications regarding their investments on a quarterly basis or bi-annual basis. The written updates may include a performance review in comparison to a pre-established benchmark index, as well as market commentary on trailing periods and an outlook on possible future developments. Some clients have asked to receive their written reports electronically. Clients also receive account statements directly from their chosen custodian on a regular basis – either monthly or quarterly.

Item 14 – Client Referrals and Other Compensation

We have been fortunate to receive many client referrals over the years. The referrals came from current clients, investment consultants, accountants, and other similar sources. The firm does not compensate referring parties for these referrals. Many times we are asked by our clients for recommendations for other professionals. When we refer a prospect or client to them we do not accept any referral fees or any form of payment.

We have no business other than providing investment advice to our clients, and our firm has no other sources of income except interest income from short-term investments.

Item 15 – Custody

All clients' accounts are held in custody by unaffiliated broker/dealers, but Wills Financial Group can access many clients' accounts through its ability to debit advisory fees. For this particular reason Wills Financial Group is considered to have custody of client assets. Consequently, Wills Financial Group maintains the following safeguards:

- The client has provided written authorization to deduct advisory fees directly from the client's account, and
- send the client an invoice itemizing the fee. The invoice includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Account custodians send statements directly to the account owners on a monthly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by Wills Financial Group.

If the client is not receiving monthly brokerage statements either electronically or in hardcopy or if they notice any discrepancies between our reports and the brokerage statements, please contact us at 804-330-3100. Our statements may vary slightly from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Wills Financial Group occasionally may act as both trustee and the investment advisor on an account. In so doing, we have indicated a "yes" response to Item 9A, Custody, ADV Part 1 filed with the SEC, and we do comply with the safeguarding requirement of an independent verification for this account by a required annual surprise audit. While Wills Financial Group may provide trustee services for a client, Wills Financial Group does not consider trustee or custody services to be a material aspect of its overall business.

Item 16 – Investment Discretion

We have discretionary authority to manage securities accounts on behalf of all of our clients. We have the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Clients grant us trading discretion through the execution of the Wills Financial Group's Letter of Engagement (LOE.)

Discretionary trading authority facilitates placing trades in client accounts on their behalf so that we may promptly implement the client's investment policy. Clients may limit our authority to buy certain securities and provide us with investment policies or other guidance on their investment objectives that may limit our discretion.

Item 17 – Voting Client Securities

Owners of common stocks are asked by the related boards of directors to vote on shareholder matters and respond to the issuers' communications (e.g., proxies, proposed mergers, tender offers, etc.) Client may authorize Wills Financial Group to vote the Client's proxies and respond to other communications from stock issuers. To do so, Client should direct the custodian of his Account(s) to have stockholder communications sent to Wills Financial Group for action. Wills Financial Group's Proxy Voting Policy is available upon request. If Wills Financial Group votes proxies for an Account, Client may ask us at any time for a record of votes made and any actions taken in response to issuers' communications.

When we proxies we will vote in the best interests of our clients and in accordance with our established policies and procedures. We vote all proxies so as, in our opinion, to maximize shareholder value which is defined as long-term value through dividend and price appreciation. We will vote proxies in a way that we believe will cause a stock to increase the most, or decline the least in value.

Item 18 – Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Wills Financial Group has no such financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

Wills Financial Group has not been the subject of a bankruptcy petition at any time during the past ten years.