

Form ADV Part 2A

Item 1 – Cover Page

WealthHarbor Capital Group, LLC

365 Canal Street, Suite 3050

New Orleans, LA 70130

504-482-1962

www.wealthharbor.com

03/25/2015

This Brochure provides information about the qualifications and business practices of WealthHarbor Capital Group, LLC (here in also referred to as WCG). If you have any questions about the contents of this Brochure, please contact us at 504-482-1962 or scottg@wealthharbor.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.

WealthHarbor Capital Group, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about WealthHarbor Capital Group, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated 03/18/2014 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

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 materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

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

Currently, our Brochure may be requested by contacting Scott Grandbouche, President of WealthHarbor Capital Group, LLC at 504-482-1962 or scottg@wealthharbor.com . Our Brochure is also available on our web site www.wealthharbor.com, also free of charge.

Additional information about WealthHarbor Capital Group, LLC is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with WealthHarbor Capital Group, LLC who are registered, or are required to be registered, as investment adviser representatives of WealthHarbor Capital Group, LLC.

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Item 4 – Advisory Business

WealthHarbor Capital Group, L.L.C. (WCG) is an SEC registered investment advisory firm founded in 2001 by President and owner Scott Grandbouche. WCG is engaged in asset management advisory services for 401(k) and other retirement plans, trusts, foundations, corporations and individuals on either a discretionary or non-discretionary basis. Each client meets with an advisor regarding WCG's investment approach and its suitability based on other invested assets and their investment objectives. The interview includes discussions relative to investment goals, risk and volatility tolerance, investment time horizons, and basic financial data. Client input is carefully considered and a client's wishes regarding the inclusion or exclusion of certain investment vehicles or asset classes is adopted after discussions regarding their goals and specific portfolios.

WCG may use a variety of financial instruments including individual equities, mutual funds, exchange traded funds (ETFs), index basket securities (Spiders, Webs, etc.), conservative option strategies, international investments, and fixed income. In certain cases, all or a portion of a client's advisory services may be obtained from other registered investment advisers through WCG; and in such circumstances, WCG will continue to act as a consultant to the client for the purpose of managing the total client investment relationship.

WCG manages assets for clients on both a discretionary and non- discretionary basis. As of 03/01/2015 WCG is managing \$146,500,000 for clients on a discretionary basis.

Item 5 – Fees and Compensation

Client fees will be billed in advance and calculated as of the last business day of each calendar quarter based on the closing market value for the quarter (as determined in good faith by WCG) of the assets in the Account. The management fee for WCG managed assets is one and one half percent (1 1/2%) per annum charged quarterly. Fees are negotiable and may be discounted at the discretion of WCG. Typically, these fees are deducted directly from the assets of client accounts but a special arrangement may be made to bill the clients directly. This fee will not include transaction-clearing costs that will be charged by the custodian. This fee is approximately \$12.00- \$20.00 per trade but may be amended by the clearing firm from time to time. WCG does not receive any portion of this fee and does not control the clearing firm's fee structure for trades other than WCG's ability to replace a

clearing firm that charges fees excessive in the view of WCG. WCG will use no-load or NAV trades of load mutual funds and does not receive 12b-1 fees for individually managed accounts paid directly by mutual fund companies. The fee for the initial or terminating calendar quarter will be pro-rated for the number of days which the Agreement was in effect and any refunds will be returned to client accounts prior to account transfer to the new custodian. WCG will receive no start-up or termination fees, nor will the client be subject to any penalties unless pre-stipulated by the custodian.

Additions to the account between billing periods may be charged a pro rata management fee, at the discretion of WCG, in the same fashion as the Initial Fee described above.

Increases in the Management Fee will only be implemented at the beginning of a new quarter and upon completion of a new client agreement. Reductions in fees will take place at the beginning of the next calendar quarter.

WCG may offer clients management services through other investment advisory products such as variable annuities with no CDSC. Appropriate disclosure and fee documents from registered advisers will be provided when used by WCG.

Daily valuation retirement plan clients are charged on a quarterly basis in arrears. The management fee for these plans is 1.5% of assets per annum charged quarterly. This fee is negotiable and may be modified at the discretion of WCG depending on the specific factors of the case. These plans also incur fees from custodians, record keepers, and third party administrators; and these fees are either directly billed to the clients, deducted from their assets, or paid out of the management fee charged by WCG depending on the negotiated contract details for the client. In any case, these fees are fully disclosed to the plan sponsor and participants. All mutual fund credits including 12-b1 fees and Sub TA fees are returned to the plan to offset the disclosed management fees.

WCG fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses, if any. Any such fees, determined by the custodian, shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, 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. 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 WCG's fee, and WCG shall not receive any portion of these commissions, fees, and costs.

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

WCG 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

WCG provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, trusts, estates, corporations, and 401(k) plans.

Minimum Initial Account Value is \$100,000. WCG may, under certain circumstances, waive the minimum account value.

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

WCG designs asset allocation models for its clients based on a proprietary research model of asset class rotation using a core of conservative investments and smaller allocations of more volatile sectors and classes. WCG occasionally provides equity management for some clients based on WCG's independent research including the use of various research sources. WCG's investment philosophy is based on risk management and long term conservative growth of assets but investing in securities involves risk of loss that clients should be prepared to bear.

WCG uses an investment committee to analyze internal and external research to understand how sector specific asset classes perform in various market cycles and in various economic conditions. The investment committee will then construct a portfolio based upon a core weighting (between 40% and 100%) of what we consider to be the least volatile assets classes. The investment committee then selects tactical allocations to asset classes that have the greatest chance for appreciation. These tactical pieces are then given small percentage weightings in the portfolio (between 3% and 20%). The portfolios are designed to provide returns with reduced downside capture and lower volatility than the S&P 500. Portfolios are then further tailored to the risk tolerance and objective of clients.

This strategy is designed to reduce the risk of loss but it is not expected to eliminate the risk of loss and clients should expect to bear any losses incurred utilizing this strategy.

WCG invests in asset categories and sectors primarily through the use of mutual funds. Our investment committee carefully selects mutual funds through the analysis of their past performance, the investment managers style and expertise, the fund's holdings, style purity, and other analytics. WCG uses mutual funds because they allow us access to systemic market appreciation and have the ability to limit the specific risk of individual stock ownership. This strategy is designed to reduce the risk of loss but it is not expected to eliminate the risk of loss and clients should expect to bear any losses incurred utilizing this strategy.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of WCG or the integrity of WCG's management. WCG has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Scott I. Grandbouche has from time to time been retained as an expert witness in securities related litigation cases. As a practical matter, time spent as an occasional expert witness cannot be meaningfully segregated. The litigation support, retirement plan consulting and investment advisory services collectively constitute a full time profession.

Scott I. Grandbouche and Brandon S. Grandbouche are both also registered as Investment Advisor Representatives of Equitas Capital Advisors, LLC where they serve as Investment Management Consultants to that firm's clients. This registration was done as part of a strategic alliance between the two firms. As part of this arrangement WealthHarbor receives non-cash benefits of office space, insurance coverage and parking.

WCG has designed the WealthHarbor Select 401(k) Plan and dedicates a portion of management's time in servicing Plan Sponsors and other advisors using the platform. The time involved with the Select 401(k) platform is directly linked to WCG's investment advisory services and certain fees charged are dedicated to plan administration and the balance to investment advisory fees.

WCG is sub-advisor to EKCL Financial Advisors (EKCL), a Louisiana registered RIA that is a subsidiary of Ericksen, Krentel and LaPorte, CPAs. WCG provides all investment advisory services to EKCL and shares revenue on clients of EKCL. Fees are the same as those charged by WCG and are subject to discount on a case by case basis at the discretion

of WCG. WCG's investment approach is the same for EKCL clients as it is for regular WCG clients.

WCG is sub-advisor to Financial Management Solutions (FMS), a Mississippi registered RIA. WCG provides investment advisory services to FMS and shares revenue on clients of FMS. Fees are the same as those charged by WCG and are subject to discount on a case by case basis at the discretion of WCG. WCG's investment approach is the same for FMS clients as it is for regular WCG clients.

WCG is sub-advisor to Equitas Capital Advisors, a Louisiana registered RIA. WCG provides investment advisory services to Equitas Capital Advisors and shares revenue on clients of Equitas Capital Advisors. Fees are the same as those charged by WCG and are subject to discount on a case by case basis at the discretion of WCG. WCG's investment approach is the same for Equitas Capital Advisors clients as it is for regular WCG clients.

Dumaine Consultants LLC are contracted to refer potential investment advisory clients to WCG. Such solicitations will be done by Dumaine Consultants LLC as impersonal advisory services only.

David Moolekamp, CPA is contracted to refer potential investment advisory clients to WCG. Such solicitations will be done by David Moolekamp, CPA as impersonal advisory services only.

Robert Culumber, CPA is contracted to refer potential investment advisory clients to WCG. Such solicitations will be done by Robert Culumber, CPA as impersonal advisory services only.

Dennis Crawford, is contracted to refer potential investment advisory clients to WCG. Such solicitations will be done by Dennis Crawford as impersonal advisory services only.

Daniel Peterson, is an investment advisor with First Independent Advisory and is contracted to refer potential advisory clients to WCG. He is covered under the solicitation agreement between WCG and First Independent Advisory. Such solicitations will be done by Daniel Peterson as impersonal advisory services only.

Kevin Downs, is an investment advisor with Kovack Securities, Inc and is contracted to refer potential advisory clients to WCG. He is covered under the solicitation agreement between WCG and Kovack Securities, Inc. Such solicitations will be done by Kevin Downs as impersonal advisory services only.

Dallas Horn, is an investment advisor with Multi-Financial Securities Corporation and is contracted to refer potential advisory clients to WCG. He is covered under the solicitation agreement between WCG and Multi-Financial Securities Corporation. Such solicitations will be done by Dallas Horn as impersonal advisory services only.

Larry McDaniels is contracted to refer potential investment advisory clients to WCG. Such solicitations will be done by Larry McDaniels as impersonal advisory services only.

Item 11 – Code of Ethics

WCG has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at WCG must acknowledge the terms of the Code of Ethics annually, or as amended.

WCG anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which WCG has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which WCG, its affiliates and/or clients, directly or indirectly, have a position of interest. WCG's employees and persons associated with WCG are required to follow WCG's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of WCG and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for WCG's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of WCG will not interfere with (i) making decisions in the best interest of advisory clients and (ii) 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 WCG's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between WCG and its clients.

Related persons to WCG might from time to time purchase or sell assets in their own accounts whether or not the same activities take place in WCG managed accounts. However, representatives of WCG will not give preference to their own orders over a client's activities.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with WCG's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. WCG will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

WCG's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Scott Grandbouche.

It is WCG's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. WCG will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 12 – Brokerage Practices

Where the client chooses to grant investment discretion to WCG, WCG will normally have authority to supervise and direct the investments of and for the client's account without prior consultation with the client. Pursuant to this discretionary authority WCG will normally determine which securities are bought and sold for the account, the total

amount of such purchases and sales, the brokers or dealers through which transaction will be executed, and the commission rates paid to effect the transactions. WCG's authority may be subject to specific conditions imposed by the client, e.g. restrictions on certain industry purchases due to positions held in other accounts or work related concentrated sectors. As a practical matter, most transactions will be implemented through the broker/dealer custodian, Pershing Advisory Solutions at a fixed price of approximately \$12.00 -\$20.00 per transaction. WCG does not receive any revenue from these fees and receives no soft dollar benefits from any broker dealer. Clients understand that fees could be less than this cost in certain circumstances if trades were executed away from clearing broker/dealer.

As discussed above, WCG has selected Pershing Advisory Solutions (PAS) as the broker/dealer through which securities orders are placed. WCG believes that PAS, through their clearing services will offer competitive prices and markets for execution of securities for WCG accounts at favorable prices consistent with "best execution" of such transactions. WCG's selection of PAS takes into account the quality of the brokerage services, including such factors as execution capability, willingness to commit capital, financial stability, and clearance and settlement capabilities. Accordingly, WCG account transactions may not always be executed at the lowest possible cost.

Item 13 – Review of Accounts

Reviews. Accounts are constantly monitored with reviews performed monthly using client statements and formal reviews on a quarterly basis using performance reports.

Allocation models determine balancing guidelines which are based on an individual account's investment objectives.

Reviewers. WealthHarbor Capital Groups' investment committee includes professional with over 40 years of combined financial services experience. The investment committee members are Series 65 licensed and hold various professional designations. The current number of advisory accounts can easily be handled by this committee.

Reports include regular monthly securities statements issued by the broker/dealer clearing firm holding the account and more complete quarterly performance reports.

Item 14 – Client Referrals and Other Compensation

WCG receives no economic benefit from any non-client in connection with giving advice to clients.

WCG compensates only contracted solicitors for client referrals. Pursuant to the Agreement, the Solicitor has agreed to solicit persons to engage WCG to provide 401(k) and/or investment advisory services ("Advisory Services"). In return for the Solicitor's services under the Agreement, WCG has agreed to pay the Solicitor a fully disclosed fee received from each person solicited by the Solicitor who subsequently engages WCG to provide Advisory Services. Said fees shall be rendered to Solicitor for the term of the advisory relationship.

Notwithstanding the aforementioned contractual relationship, the Solicitor is not an officer or employee of, or otherwise affiliated with WCG. No person who is solicited by Solicitor on behalf of WCG and who engages WCG to provide Advisory Services will be charged fees above and beyond the customary fees charged by WCG, due to the fact that WCG obtained such Client pursuant to a Solicitor's arrangement. There is no differential in the amount or level of investment advisory fees charged to any Client of WCG for Advisory Services attributable to the existence of the Agreement.

Furthermore, clients introduced by Solicitor will be required to enter into a separate investment advisory agreement directly with WCG. Solicitors must provide clients with WCG's disclosure brochure, currently the ADV Part II, as directed by the Investment Advisors Act and required by the SEC. Clients must sign the solicitation disclosure form acknowledging receipt of the firm's disclosure brochure under the Investment Advisers Act and required by the Securities and Exchange Commission must be provided to and signed any client or prospective client before establishing a relationship with the firm as your investment adviser.

Item 15 – Custody

WealthHarbor is deemed to have custody of Clients' assets because we have the ability to debit some of our clients' accounts for investment management fees. As described in Item 5, we generally charge clients' accounts quarterly in advance or arrears based upon submission of fee bills to each client's custodian.

You should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains your investment assets. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. For tax and other purposes, your custodial statement is the official record of your account(s) and assets.

We urge you to carefully review your custodian statements and compare them to the account statements that we may provide to you as your investment manager.

Item 16 – Investment Discretion

WCG usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, WCG observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, WCG's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to WCG in writing.

Item 17 – Voting *Client* Securities

As a matter of firm policy and practice, WCG does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. WCG may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about WCG's financial condition. WCG 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.

Form ADV Part 2B Supervised Persons

Item 1- Cover Page

Brandon Scott Grandbouche

WealthHarbor Capital Group, LLC

365 Canal Street, Ste 3050, New Orleans, LA 70130

504-482-1962

03/25/2015

This Brochure Supplement provides information about Brandon Scott Grandbouche that supplements the WealthHarbor Capital Group, LLC Brochure. You should have received a copy of that Brochure. Please contact Scott Grandbouche at 504-482-1962 if you did not receive WealthHarbor Capital Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Brandon Scott Grandbouche is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Brandon Scott Grandbouche, born 1978, graduated from Louisiana State University in 2001 with a BA in Mass Communications. He has since passed the Series 65 Uniform Investment Adviser Law Examination and earned the professional designation of Qualified Plan Financial Consultant (QPFC) from the American Society of Pension Professionals and Actuaries (ASPPA). Outlined below is his work experience for the previous five years.

January 1, 2004-Present Employed by WealthHarbor Capital Group, LLC
Brandon started as an intern in 2004 and has held titles of Investment Advisor, Retirement Consultant, and currently holds the title of Pension Consultant.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

No information is applicable to this Item.

Item 5- Additional Compensation

No information is applicable to this Item.

Item 6 - Supervision

Brandon is a member of WealthHarbor Capital Group's investment committee and participates jointly in all activities of the committee. His responsibilities on the committee include the review and evaluation of investment vehicles, the discussion and implementation of portfolio changes, the evaluation and discussion of macro and micro economic trends, the evaluation and discussion of outside research, and the compilation and discussion of proprietary research. He is directly supervised in all activities by Scott Grandbouche, President of WealthHarbor Capital Group, who may be reached at 504-482-1962. This supervision includes the monitoring and coaching of all client interaction including, but not limited to, phone conversations, face to face client interaction, and email messages. Brandon exercises discretion over client accounts only as a member of the investment committee and never in a solo capacity. The investment advice Brandon disseminates to clients is based solely on the recommendations of the investment committee in which his involvement is constantly supervised and analyzed.

Form ADV Part 2B Supervised Persons

Item 1- Cover Page

Scott Irvin Grandbouche

WealthHarbor Capital Group, LLC

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Additional information about Scott Irvin Grandbouche is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Scott Grandbouche, born 1951, graduated from Louisiana State University in 1974. He has since passed the Series 65 Uniform Investment Adviser Law Examination and earned the professional designation of Accredited Investment Fiduciary from the Center for Fiduciary Studies. Outlined below is his work experience for the previous five years.

May, 2001-Present Employed by WealthHarbor Capital Group, LLC

Scott founded WealthHarbor in 2001 and is the currently hold the title of Managing Partner. Prior to founding WealthHarbor, he served as President/CEO of First American Investment Banking Corp. in Tampa, FL and has held local and regional management positions for E.F Hutton & Co., Legg Mason Wood Walker, and Prudential Securities.

Item 3- Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4- Other Business Activities

No information is applicable to this Item.

Item 5- Additional Compensation

No information is applicable to this Item.

Item 6 - Supervision

Scott is the head of WealthHarbor Capital Group's investment committee and participates jointly in all activities of the committee. His responsibilities on the committee include the review and evaluation of investment vehicles, the discussion and implementation of portfolio changes, the evaluation and discussion of macro and micro economic trends, the evaluation and discussion of outside research, and the compilation and discussion of proprietary research. He directly supervises all activities by the WealthHarbor staff. Scott Grandbouche, President of WealthHarbor Capital Group, may be reached at 504-482-1962. This supervision includes the monitoring and coaching of all client interaction including, but not limited to, phone conversations, face to face client interaction, and email messages. Scott exercises discretion over client accounts as a member of the investment committee. The investment advice Scott disseminates to clients is based solely on the recommendations of the investment committee in which his involvement is constantly supervised and analyzed.