

# **Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300

[www.Wellington401k.com](http://www.Wellington401k.com)

**October 12, 2017**

(Other than Annual Update Amendment)

## **With Wellington Privacy Statement**

**This Brochure provides information about the qualifications and business practices of Wellington Consulting Services, Inc. If you have any questions about the contents of this Brochure, please contact us at (703) 802-2300 or via email at [help@wellington401k.com](mailto:help@wellington401k.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.**

**Wellington Consulting Services, Inc. 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 Wellington Consulting Services, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 – Material Changes

This disclosure document is being provided as required by the United States Securities and Exchange Commission (SEC) and pertains to updated plan custody, trading support and administrative services information and costs regarding Wellington's Perfect401(k)<sup>TM</sup> retirement plan product.

**Wellington Consulting Services, Inc.'s last annual update amendment was dated January 9, 2017 covering the 2016 compliance calendar year.**

Pursuant to SEC Rules, Wellington Consulting Services, Inc. will ensure that our clients receive a summary of material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide further ongoing disclosure information about material changes as necessary.

We will furnish our clients 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 Peter Jones, Chief Compliance Officer, at (703) 802-2300 ext. 3333 or [help@wellington401k.com](mailto:help@wellington401k.com). Our Brochure is also available on our web site [www.Wellington401k.com](http://www.Wellington401k.com) also free of charge.

Additional information about Wellington Consulting Services, Inc. is available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Wellington Consulting Services, Inc. who are registered, or are required to be registered, as investment adviser representatives of our firm.

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## Item 4 – Advisory Business

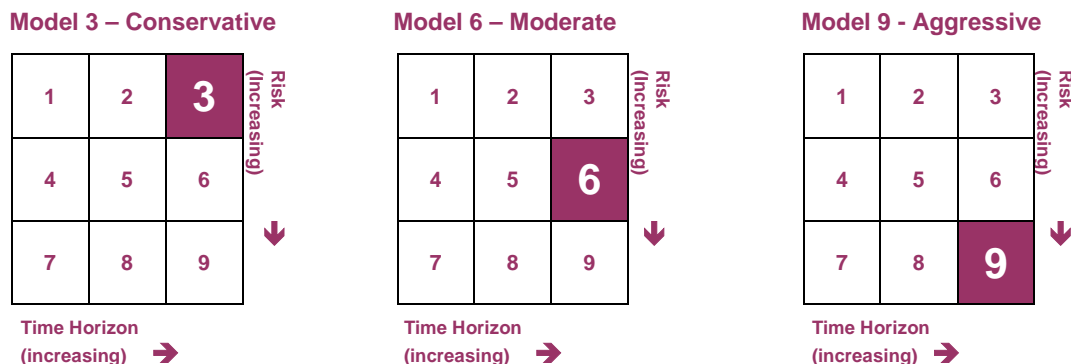
Wellington Consulting Services, Inc. (“WCS”) was formed for the purpose of bringing conservative yet truly cutting-edge money management services to both our corporate clientele and individual investors. While our long-term approach to systematic investing allows us to focus easily on retirement planning needs, we have consciously adapted the same techniques and applied them as a process of investing suitable for the individual investor as well. This foundation combined with our commitment to remain at the forefront of innovative thinking embodies our company’s motto of:

### *“Solving Tomorrow’s Retirement Problems Today”*

WCS was incorporated and began operations on April 8, 1992. Its principal owners are Peter Everington Jones and Stephen Michael Lynch.

Our firm provides discretionary money management services to individuals for their personal investment accounts as well as for their company-sponsored retirement plan accounts. In providing our advisory services we utilize no-load mutual funds or electronically traded funds (ETF’s) which fit well with our conservative long-term approach to investing. Our primary focus is the management of IRA’s, 401(k)’s and other retirement-related accounts for individuals. We also offer non-discretionary advice to individuals and retirement plan participants.

Our discretionary mutual fund advisory services are tailored to specific individuals’ needs by determining which of our actively managed mutual fund portfolios fit best with each clients desired risk profile and timeframe to retirement (or expected drawdown of the managed assets). This “Risk” vs. “Timeframe” matrix may be represented as follows:



Alternatively, each client is able to specify which of the many no-load mutual funds or ETF’s available through Charles Schwab & Co., Inc. and/or Charles Schwab Bank – the custodians of all our client assets – that they wish to own. Our firm will then make the appropriate initial (and any subsequent) mutual fund purchases to keep the account balanced near its allocation targets over time. Clients may also impose investment restrictions with regard to the types of mutual funds purchased.

WCS’s Perfect401(k)<sup>™</sup> utilizes three managed mutual fund portfolios rather than nine but otherwise is essentially the same with regard to its advisory services.

Notably, in conjunction with its advisory services for company-sponsored retirement plans, WCS is typically acting in the capacity of an ERISA Section 3(38) “manager” (fiduciary).

For very specialized client needs, WCS will also act to place client funds with outside “separate account” managers while providing the ongoing allocation of client funds between such managers.

WCS’s discretionary Lamp-Plus, ETF service follows the same principals as above, however it is delivered as an online service only and does not allow clients the option of individually selecting their own ETF investments rather than a particular managed model portfolio.

As of the date of this interim amendment WCS managed \$638,554,948 of client assets on a discretionary or supervisory basis.

## **Item 5 – Fees and Compensation**

The specific manner in which fees are charged by WCS is established in a client's written agreement with us. We bill clients on a quarterly basis in arrears or as an average daily balance, and our advisory fees are deducted directly from client account assets unless specific instructions are given by a client who would prefer to make payment via invoice. In the case of fees for accounts of company-sponsored retirement plan participants, the plan sponsor may elect to pay some or all of their participant fees directly to us. Our management fees are determined based upon client account balances at the end of each calendar quarter or as an average daily balance during the quarter (if for the Perfect401(k)<sup>TM</sup> product). Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based upon either the percentage of the quarter that assets were under management or upon an accounts average daily balance during that quarter (if for the Perfect401(k)<sup>TM</sup> product). Either WCS or our clients may terminate an advisory contract on ten days written notice.

WCS fees are exclusive of brokerage commissions, transaction fees, mutual fund short-term redemption charges and other related costs and expenses, if any, which 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 as may be applicable. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed via prospectus.

Such charges, fees and commissions are exclusive of and in addition to our advisory fee. WCS does not receive any portion of these commissions, fees, and costs. It should be noted that clients have the option to purchase investment products we recommend through other broker/dealers or agents that are not affiliated with our firm.

Item 12 further describes the factors that our firm considers in selecting or recommending broker/dealers for client transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

Fees for our advisory services follow. All fees are subject to negotiation.

### **"LAMP-Plus"**

For clients' personal accounts our "LAMP-Plus" advisory service combines a discretionary ETF and mutual fund allocation program with a non-discretionary "side account" which may hold non-mutual fund assets in the same brokerage account.

The annual fee schedule for "LAMP-Plus" is as follows:

|       |             |                        |      |
|-------|-------------|------------------------|------|
| 2.00% | from        | \$ 25,000 to \$100,000 | plus |
| 1.75% | on the next | \$ 100,001 and higher  |      |

Annual fees for the non-discretionary services delivered via LAMP-Plus are:

1.00% flat fee

LAMP-Plus accounts below \$25,000 in discretionary assets are accepted at the option of our firm.

### **"LAMP-Plus, ETF's"**

Also for clients' personal accounts our "LAMP-Plus, ETF's" online advisory service uses a discretionary ETF allocation program driven by (Charles) Schwab Institutional Intelligent Portfolios which uses an algorithm to assign clients to a corresponding model portfolio based upon tolerance for risk and other factors. Wellington is then able to adjust the assignment of the model ETF portfolio manually if so desired.

The annual fee schedule for "LAMP-Plus, ETF" is as follows:

1.00% flat fee

LAMP-Plus, EFT accounts below \$15,000 in discretionary assets are accepted at the option of our firm.

### **"Business Solutions"**

Our "Business Solutions" advisory services, available to company-sponsored retirement plan participants, allows each participant to select one of three levels of advisory services.

Wellington Fully Discretionary: Retirement plan participants electing to have our firm manage their retirement account on a discretionary basis via one of our nine no-load mutual fund and/or ETF portfolios.

Participant Customized: Plan participants wishing to select their own mutual fund or ETF allocations but have our firm execute the mutual fund orders to allocate the initial account balance and any subsequent account contributions.

Participant Self-Manage: Plan participants who desire only non-discretionary investment advice and guidance from our firm but who elect to execute their own mutual fund, ETF and other securities orders.

Advisory and related fees range up to 1.25% for our fully-discretionary service but are based upon which level of advisory service is being selected by each individual plan participant as well as the level of total plan assets. Plan participants pay for only the level of advisory and related services selected by themselves personally. Fees for all three levels of service are negotiable.

### **"Perfect401(k)<sup>TM</sup>"**

WCS's Perfect401(k)<sup>TM</sup> plan is a product for company-sponsored 401(k) plans and is very similar to our Business Solutions retirement plan product except that assets are primarily custodied by Charles Schwab Bank rather than Charles Schwab & Co., Inc. ETF's may be used along with individual mutual funds for the plan participant Designated Investment Alternatives ("DIA's) and managed model portfolios. Once again participants are able to select from one of three levels of advisory services.

Advisory and related fees range up to 1.25% for our fully-discretionary service but are based upon which level of advisory service is being selected by each individual plan participant as well as the level of total plan assets. Plan participants pay for only the level of advisory and related services selected by themselves personally. Fees for all three levels of service are negotiable.

Additionally, fees for services by WCS-associated companies may be applicable. Charles Schwab Bank charges a fee for plan custody services and (if applicable) trading support for Electronically Traded Funds ("ETF's") which is disclosed in the 408(b)(2) statement provided to the client directly by Charles Schwab Bank. Everington Consulting, Inc. ("ECI"), a company associated with WCS, collects and remits (on a quarterly basis) an amount to Charles Schwab Bank determined by Charles Schwab Bank's schedule of such custodian and ETF trading support fees. Charles Schwab Bank's applicable minimum annual Plan Custodian Fee is \$400. ECI pays any or all of this \$400 minimum fee charged by Charles Schwab Bank whether or not it has collected sufficient fees to cover this amount. Additionally, and in conjunction with its collection of custody and trading support fees for Charles Schwab Bank, ECI may charge and collect an administrative support fee which it retains. ECI's administrative support fee, if any, is 0.055% or less annually, and is negotiable. This

fee may be based upon assets held at Charles Schwab Bank and/or assets in “brokerage-window” accounts held within the plan that are custodied at Charles Schwab & Co., Inc. according to the terms of the client’s service agreement with ECI.

#### MAC (Managed Account Connection)

The MAC (Managed Account Connection), advisory services matches our clients with specialized outside money managers selected by our firm. We then determine the ongoing allocation of client assets amongst the team of managers. The annual fee for the program is a flat fee of 1%.

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

WCS 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**

WCS provides portfolio management services to individuals, high net worth individuals and companies sponsoring retirement plans for their employees. Our discretionary retirement plan services may be provided via a single plan sponsor trust account or via individual participant accounts depending upon which Wellington advisory services is being utilized.

Typically an initial investment of \$25,000 is required for advisory services to individuals for the management of their personal portfolios (although this is negotiable) while no minimums exist for participants in company-sponsored retirement plans.

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

WCS primarily uses a “top-down” or “macroeconomic” approach to investment management where conditions in the US and world economies are first analyzed to discern the basic investment climate and major economic trends. The analysis is then progressively focused to subsectors of interest from which specific investment themes - such as the strengthening or deterioration of emerging markets or certain commodities - are identified. Finally, specific mutual funds or ETF’s are selected in an attempt to profit from the investment themes we have identified.

Our company will also on occasion make investments for clients due to perceived opportunities provided by extremes in investor sentiments or asset pricing which we believe to be unfounded.

Investment risks to these approaches include the possibility that our company misreads primary economic conditions, trends, investor sentiment and current asset pricing - or that we fail to translate the economic environment into specific and profitable mutual fund and/or ETF selections.

Since mutual funds and ETF’s are used exclusively when carrying out our discretionary advisory services, certain associated risks of mutual funds and ETF’s should be considered. These risks include:

- Some mutual funds and ETF’s are minimally diversified if intentionally focused on specific investment sectors.
- Mutual funds and ETF’s with fewer assets may be subject to greater price swings due to investor contributions and withdrawals.
- Mutual fund and ETF expenses and management experience differs substantially between funds and ETF’s.
- Certain mutual funds and ETF’s are subject to transaction charges or short-term redemption charges.
- ETF purchases within Wellington’s “Business Solutions” advisory service for retirement plan participants, for which fractional share purchases and “Same Day” ETF exchanges are not available,

may result in less plan participant account diversification or an increased length of time for targeted account diversification to be realized.

There are other risks to investment in mutual funds and ETF's which should be reviewed in the associated prospectuses.

WCS utilizes only mutual funds and ETF's with no "loads" - meaning that there are no sales commissions deducted from the principal value of your investment upon your purchase or redemption of a fund or ETF. Furthermore, WCS does not receive payments from the mutual funds or ETF's it recommends.

**Regardless of the investment approach taken or investment vehicle utilized, investing in mutual funds, ETF's or other securities involves risk of loss that clients should be prepared to bear. Mutual funds and ETF's are not FDIC insured.**

## **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 WCS or to our integrity or management. Our firm has no information applicable to this Item.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Several associated companies comprise "The Wellington Group of Companies" along with Wellington Consulting Services, Inc.:

**Wellington Financial Group, Inc.** maintains our pre-approved prototype retirement plan documents for our qualified retirement plan clients as well as providing annual sponsor reporting.

Wellington Financial Group, Inc. currently performs pension plan recordkeeping third party administrative services for a subset of the applicant's retirement plan clients.

State of Incorporation: Virginia  
Date of incorporation: October 19, 1990

**Wellington Retirement Solutions, Inc.** performs pension plan recordkeeping third party administrative services for a subset of the applicant's retirement plan clients.

State of Incorporation: Florida  
Date of incorporation: January 1, 2015

**Everington Consulting, Inc.** provides related administrative, recordkeeping and marketing services.

State of Incorporation: Virginia  
Date of incorporation: April 8, 2005

## **Item 11 – Code of Ethics**

WCS 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 WCS must acknowledge the terms of the Code of Ethics annually, or as amended.

WCS's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting our Chief Compliance Officer.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of WCS 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 our clients. Because WCS utilized mutual funds almost exclusively to carry out its advisory services and because mutual funds are designated as exempt transactions, the issue of personal securities transactions as they relate to our employees is minimized.

In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity should they ever occur. 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 WCS and its clients.

## **Item 12 – Brokerage Practices**

### The Custodian and Brokers We Use

WCS does not maintain custody of client assets, although we may be deemed to have custody of client assets if you (our client) have given us authority to withdraw assets from your account. Your assets must be maintained in an account at a “qualified custodian,” generally a broker/dealer or bank. We require that our clients use Charles Schwab & Co., Inc., a registered broker-dealer, member SIPC, as the qualified custodian, or an affiliated entity, Charles Schwab Bank (jointly “Schwab”). We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage or bank account and buy and sell securities when so instructed. While we require that you use Schwab as custodian/broker, you will decide whether to do so and 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 may assist you in doing so. If you do not wish to place your assets with Schwab, then we cannot manage your account. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see “Your Brokerage and Custody Costs”) although we generally do not. Not all advisers require that clients direct brokerage transactions through a specified broker-dealer and consequently we may be unable to achieve the most favorable execution of client transactions resulting in additional costs to you.

### How We Select Brokers/Custodians

We seek to use 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.
- 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 [ETFs], etc.)
- The availability of a large number of mutual funds and ETF's that are both no-load and that have no transaction charges.
- 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 the 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 is generally compensated by

charging you commissions or other fees on trades that it executes or that settle into your Schwab account although Charles Schwab Bank also charges an asset-based fee for its services as custodian.

Although Schwab can execute trades via other broker/dealers that are settled at Schwab (“trade away”) 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/Custodians”).

#### Products and Services Available to Us From Schwab

Charles Schwab & Co., Inc., Charles Schwab Bank and Schwab Retirement Technologies, Inc.<sup>®</sup> are separate but affiliated companies and subsidiaries of The Charles Schwab Corporation. Brokerage products and services are offered by Charles Schwab & Co., Inc. Trust and custody services are provided by Charles Schwab Bank. Schwab Retirement Technologies, Inc.<sup>®</sup> is engaged in developing and licensing proprietary retirement plan recordkeeping systems to independent recordkeepers.

The Schwab entities above provide services to investment advisory firms like WCS. They provide us 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, while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab’s support 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 by our clients. Schwab’s services described in this paragraph generally benefit you and your account. Such “soft dollar” benefits are used to service all client accounts and there is no effort to differentiate client accounts based upon such soft dollar benefits received.

#### Services That May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients’ accounts
- Assist with back-office functions, recordkeeping, and client reporting

#### Services That Generally Benefit Only Us

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

- Educational conferences and events.
- Consulting on technology, compliance, legal and business needs.
- Publications and conferences on practice management and business succession.
- Access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

#### 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 require 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 Brokers/Custodians") and in particular the availability of thousands of no-load, no-transaction charge mutual funds, which is our investment vehicle of choice.

#### **Item 13 – Review of Accounts**

Upon implementation of the client's advisory services, market, mutual fund manager and investment developments are monitored constantly. Investment Committee reviews are conducted approximately monthly at the level of mutual fund and ETF selection and quarterly at the level of "client objectives" (do clients' stated objectives coincide with their current portfolio holdings). At the level of mutual fund and ETF selection, "Investment Committee Member(s)" review the mutual funds currently held in managed client portfolios to insure that they continue to meet their respective investment objectives as well as continue to rate well within their particular peer group of funds.

All "Investment Adviser Representatives" act as account reviewers under the supervision of the Investment Committee Member(s) at the "client objective" level. Account reviewers are instructed to review investment options or chosen model portfolios based on their continued consistency with client investment objectives, current circumstances and level of sophistication. Investor objectives are measured with regard to their risk tolerance and investment timeframe.

WCS's Chief Compliance Officer also reviews a random sampling of client accounts to insure that our Investment Adviser Representatives continue to properly match our client objectives to the portfolios that we manage for them.

Our clients receive monthly account statements directly from Charles Schwab & Co., Inc. only if there has been activity in their account during the prior month, however they receive statements at least quarterly regardless of account activity. WCS personnel provide oral or written reviews of client accounts and objectives upon demand. Our clients who oversee company sponsored retirement plans also receive quarterly trustee reports regarding plan specifics and participant holdings, while the plan participants themselves receive additional account and retirement-related information quarterly as well as all information required under ERISA 404(a)(5) quarterly or annually as required.

#### **Item 14 – Client Referrals and Other Compensation**

WCS receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

WCS may pay a portion of advisory fees for the referral or solicitation of clients to an individual and/or their supervisor. Individual “solicitors” receiving such compensation must hold the same securities licenses required of our supervised persons although such solicitors do not provide investment advisory services to clients on our behalf. All such compensation to solicitors is disclosed to each client and is generally made in accordance with the following schedule:

|                                                          |       |
|----------------------------------------------------------|-------|
| Investment Adviser Representative acting as a solicitor: | 75.0% |
| Wellington Consulting Services, Inc.                     | 25.0% |

#### **Item 15 – Custody**

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct Schwab to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person’s account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. These statements will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab’s account statements to the periodic account and vesting statements and reports you receive from us. (Our statements may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.)

#### **Item 16 – Investment Discretion**

WCS 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, we observe the investment policies, limitations and restrictions provided by the clients to whom we provide such services. Such investment guidelines and restrictions must be provided to WCS in writing.

#### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, WCS 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. WCS 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 WCS’s financial condition. WCS 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.

## END OF FORM ADV PART 2A

### Wellington's Privacy Pledge

*At Wellington, your privacy is our top priority and is held in the strictest confidence. We collect personal information to open your account(s), to process your transactions and to help us provide a better level of service.*

*We do not sell your personal information to anyone. We protect the security and confidentiality of the personal information we collect. Our relationship with you is our most important asset. We understand that you have entrusted us with your private financial information, and we do everything we can to maintain that trust.*

*Details of our approach to privacy and how your personal information is collected and used are described below. If you have any questions regarding Wellington policies please don't hesitate to contact your Wellington representative.*

## Privacy Statement

Wellington Consulting Services, Inc., an independent Registered Investment Advisory firm, is committed to safeguarding the confidential information of its clients. We hold all personal information provided to our firm in the strictest confidence. These records include all personal information that we collect from you in connection with any of our services provided. We have never disclosed information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to anticipate such a change in firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use financial information that you provide to us to help you meet your personal financial goals while guarding against any real or perceived infringements of your rights of privacy. Our policy with respect to personal information about you is listed below.

- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer.)
- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of nonpublic personal information that we collect from a client depend upon the scope of the client engagement. It will include information about your personal finances, information about transactions between you and third parties, and information from consumer reporting agencies.
- For unaffiliated third parties that may require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws, and as is consistent with the CFP Code of Ethics and Professional Responsibility. After this required period of record retention, all such information will be destroyed.

### **Wellington Consulting Services, Inc.**

**Notes: A current version of Wellington Consulting Services, Inc.'s Form Part 2A & 2B, which is updated and filed with the SEC annually, is available upon request without charge.**

**PLEASE INFORM US PROMPTLY IF YOUR FINANCIAL SITUATION OR OBJECTIVES CHANGE.**

## **BEGINNING OF FORM ADV PART 2B**

### **Brochure Supplements**

**The following brochure supplements provide information specific to those individuals providing investment advice on behalf of Wellington Consulting Services, Inc.**

**These individuals either serve on our investment committee or have attained the requisite licensing and the authorization from our firm to provide individualized investment advice to clients on our behalf.**

## **Robert J. Alexander**

**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300 ext. 2304

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Robert J. Alexander that supplements the Wellington Consulting Services, Inc. "Brochure". Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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



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

Investment Committee Member  
Robert J. Alexander

- Born 12-11-82
- Graduated from George Mason University, Fairfax, VA  
B.S. in Accounting, 2008

Mr. Alexander entered the financial services industry in 2007 as a Pension Administrator with Wellington Financial Group, Inc. Mr. Alexander has also been employed as an Investment Adviser Representative with Wellington Consulting Services, Inc. since 2009.

## **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**

Mr. Alexander is an employee of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 – Additional Compensation**

No information is applicable to this Item.

## **Item 6 – Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all “supervised persons” are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

Supervised persons’ communication with clients is monitored regularly and client account reviews are conducted on a regular basis (not less often than quarterly) to determine if the investment profile and transaction activity is in accordance with the client’s stated investment objectives. Any client accounts that are believed to be out of such alignment will be noted, discussed with the client representative and or client and adjusted accordingly.

Wellington Consulting Services, Inc.’s Chief Compliance Officer is responsible for overseeing our firm’s supervised persons’ advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

## **Stephen D. Dix, QKA**

**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300 ext. 5555

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Stephen D. Dix that supplements the Wellington Consulting Services, Inc. "Brochure". Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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

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

Investment Committee Member  
Principal Executive Officer

Stephen D. Dix, QKA

- Born 7-29-67
- Graduated from the University of Maryland, College Park, MD  
B.S. in Finance, 1991
- Earned the designation of “QKA” (Qualified 401(k) Administrator)\* from ASPPA — the American Society of Pension Professionals & Actuaries, 2008

Prior to joining Wellington, Mr. Dix launched a discount brokerage service firm from 1994 through 1996. Mr. Dix worked for a hedge fund for two years before joining Wellington. Mr. Dix has served as an officer and pension administrator for Wellington Financial Group, Inc. since 1998. Mr. Dix has been employed as an investment adviser representative with Wellington Consulting Services, Inc. since 1998.

## **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**

Mr. Dix is also an officer of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 - Additional Compensation**

No information is applicable to this Item.

## **Item 6 - Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all “supervised persons” are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.’s Chief Compliance Officer is responsible for overseeing our firm’s supervised persons’ advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

## **Cheryl Greer**

**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Cheryl Greer that supplements the Wellington Consulting Services, Inc. "Brochure". Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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

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

Cheryl Greer

- Born 5-4-73
- Graduated from the George Washington University
- B.A. International Affairs - Concentration in Economics, 1995

Having entered the financial services industry in August of 1995, Mrs. Greer has worked at a variety of financial services firms working her way up to Institutional Broker at Friedman Billings & Ramsey. In 2000, Mrs. Greer moved to the UBS Private Client Group before coming to Wellington in 2003 as a 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**

Mrs. Greer is also an employee of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 - Additional Compensation**

No information is applicable to this Item.

## **Item 6 - Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all "supervised persons" are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.'s Chief Compliance Officer is responsible for overseeing our firm's supervised persons' advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

## **Harold E. Greer, QKA**

**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300 ext. 2310

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Harold E. Greer that supplements the Wellington Consulting Services, Inc. "Brochure". Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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

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

Harold E. Greer, QKA

- Born 6-7-67
- Graduated from the University of Maryland  
B.S. in Business & Administration - Concentration in Marketing, 1989
- Graduated from the University of Maryland University College  
B.A. in Information Systems, 1994
- Earned the designation of "QKA" (Qualified 401(k) Administrator)\* from ASPPA — the American Society of Pension Professionals & Actuaries, 2011

Having entered the financial services industry in August of 1990, Mr. Greer has worked at a variety of financial services firms working his way up to Institutional Broker at Friedman Billings & Ramsey. In 2000, Mr. Greer moved to the UBS Private Client Group before coming to Wellington in 2003 as a Pension Consultant. Mr. Greer has passed all the required exams for the designation of "QKA" (Qualified 401(k) Administrator)2 from ASPPA — the American Society of Pension Professionals & Actuaries.

## **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**

Mr. Greer is also an employee of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 - Additional Compensation**

No information is applicable to this Item.

## **Item 6 - Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all "supervised persons" are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.'s Chief Compliance Officer is responsible for overseeing our firm's supervised persons' advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

**Peter E. Jones CFP®, QKA**

**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300 ext. 3333

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Peter E. Jones that supplements the Wellington Consulting Services, Inc. "Brochure". Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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



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

Investment Committee Member  
Principal Executive Officer  
Chief Compliance Officer

Peter Everington Jones CFP®, QKA

- Born 3-3-58
- 1980: Graduated "With Distinction" from the University of Virginia's McIntire School of Commerce in Charlottesville: B.S. in Commerce - Double concentration in Finance and Management
- 1984: Earned degree from the College for Financial Planning in Denver: Certified Financial Planner (CFP®)\*\*
- 2008: Earned the designation of "QKA" (Qualified 401(k) Administrator)\* from ASPPA — the American Society of Pension Professionals & Actuaries

Having entered the financial services industry in January of 1981, Mr. Jones served from August of 1986 as a partner and principal of Integrated Resources Equity Corp.'s Tyson's Corner Virginia office, until its reorganization as Wellington Financial Group in October of 1989. Mr. Jones remained a partner and principal of Wellington Financial Group until becoming President upon the company's incorporation in October of 1990. Mr. Jones also serves as Secretary/Treasurer of Wellington Consulting Services, Inc.

## **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**

Mr. Jones is also an officer of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which our firm provides plan participant advisory services.

## **Item 5 - Additional Compensation**

No information is applicable to this Item.

## **Item 6 - Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all "supervised persons" are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.'s Chief Compliance Officer is responsible for overseeing our firm's supervised persons' advisory activities. Mr. Jones is our Chief Compliance Officer who may be reached at 703-802-2300 ext. 3333.

## **Stephen M. Lynch**

**Wellington Consulting Services, Inc.**

936 Allamanda Drive

Delray Beach, FL 33483

(703) 802-2300 ext. 2305

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Stephen M. Lynch that supplements the Wellington Consulting Services, Inc. "Brochure". You should have received a copy of that Brochure. Please contact our Chief Compliance Officer or contact us at [administration@wellington401k.com](mailto:administration@wellington401k.com) if you did not receive our Brochure or if you have any questions about the contents of this supplement.**

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

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

Investment Committee Member  
Principal Executive Officer

Stephen Michael Lynch

- Born 8-6-59
- Graduated from Old Dominion University, Norfolk, VA  
B.S. in Finance
- Graduated from the College for Financial Planning in Denver:  
Certified Financial Planner (CFP®) Error! Bookmark not defined. (CFP® designation allowed to lapse  
September, 2012.)

Mr. Lynch began his brokerage career with DeRand Investment Corp. in 1982. He became a partner of Integrated Resources Equity Corp.'s Tyson's Corner, Virginia office in 1984 and retained this position until the Company's reorganization as Wellington Financial Group in October of 1989. Mr. Lynch became Secretary/Treasurer of Wellington Financial Group upon its incorporation in 1990. Mr. Lynch is also president of WCS.

## **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**

Mr. Lynch is also an officer of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 - Additional Compensation**

No information is applicable to this Item.

## **Item 6 - Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all "supervised persons" are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.'s Chief Compliance Officer is responsible for overseeing our firm's supervised persons' advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

## **Ghulam Mustafa, QKA**

**Wellington Consulting Services, Inc.**

14325 Willard Road, Suite 104

Chantilly, VA 20151

(703) 802-2300 ext. 2334

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about Ghulam Mustafa that supplements the Wellington Consulting Services, Inc. “Brochure”. Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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

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

Investment Committee Member  
Ghulam Mustafa, QKA

- Born 3-27-83
- Graduated from George Mason University, Fairfax, VA  
B.S. in Finance, 2007
- Earned the designation “QKA” (Qualified 401(k) Administrator)\* from ASPPA – the American Society of Pension Professionals & Actuaries, 2009

Mr. Mustafa entered the financial services industry in 2002 as a Pension Administrator with Wellington Financial Group, Inc. Mr. Mustafa has also been employed as an Investment Adviser Representative with Wellington Consulting Services, Inc. since 2005.

## **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**

Mr. Mustafa is an employee of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 – Additional Compensation**

No information is applicable to this Item.

## **Item 6 – Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all “supervised persons” are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.’s Chief Compliance Officer is responsible for overseeing our firm’s supervised persons’ advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

## **James E. Podgorny**

**Wellington Consulting Services, Inc.**

936 Allamanda Drive

Delray Beach, FL 33483

(703) 802-2300 ext. 2334

January 9, 2017

(For Calendar Year 2016)

**This Brochure Supplement provides information about James Podgorny that supplements the Wellington Consulting Services, Inc. “Brochure”. Please note that it has been appended to our Brochure. Please contact our Chief Compliance Officer or contact us at [help@wellington401k.com](mailto:help@wellington401k.com) if you have any questions about the contents of this Supplement or the Brochure to which it has been appended.**

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

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

James E. Podgorny

- Born 7-13-65

Mr. Podgorny entered the financial services industry in 2011 as a Pension Consultant with Wellington Financial Group, Inc. Prior to joining Wellington Consulting Services, Mr. Podgorny worked in the Technology Services Industry for Campus Management Corp as an implementation Consultant and spent fifteen years at Gelco Information Network, an Expense Management Software and Services company, where he held a variety of positions including Project Manager and Senior 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**

Mr. Podgorny is also an employee of Wellington Financial Group, Inc., a company associated with Wellington Consulting Services, Inc., (WCS) which provides Third Party Administrative (TPA) services to company-sponsored retirement plans for which WCS provides plan participant advisory services.

## **Item 5 - Additional Compensation**

No information is applicable to this Item.

## **Item 6 - Supervision**

Wellington Consulting Services, Inc. has adopted policies and procedures which all “supervised persons” are expected to be familiar with and follow to ensure compliance with requirements under the Investment Advisers Act of 1940 and other relevant statutes and regulations. Each such supervised person is required to annually sign a statement that they are familiar with, and agree to abide by, our rules regarding legal compliance and ethical standards. Our firm has developed ongoing compliance procedures designed to ensure that those requirements are being met.

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Wellington Consulting Services, Inc.’s Chief Compliance Officer is responsible for overseeing our firm’s supervised persons’ advisory activities. Our Chief Compliance Officer is Peter Jones who may be reached at 703-802-2300 ext. 3333.

\* **Information regarding professional designations:**      **Qualified 401(k) Administrator**

| <b>QKA – Qualified 401(k) Administrator</b>  |                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description <sup>1</sup>                     | The Qualified 401(k) Administrator (QKA) Credentialing Program is a credentialing program for professional's working in the financial field that are specializing in retirement planning and specifically 401k planning. The Qualified 401(k) Administrator Program allows the professional to attain a credential that will enhance their professional image and the quality of business they can provide to their clients. |
| Designation                                  | Qualified 401(k) Administrator                                                                                                                                                                                                                                                                                                                                                                                               |
| Designation Status                           | Currently offered and recognized by the issuing organization                                                                                                                                                                                                                                                                                                                                                                 |
| Acronym                                      | QKA                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Issuing Organization                         | <a href="#">American Society of Pension Professionals &amp; Actuaries</a>                                                                                                                                                                                                                                                                                                                                                    |
| Prerequisites/Experience Required            | A minimum of two years experience in retirement plan related matters is required along with completion of ASPPA's QKA examination series to be a candidate for this credential.                                                                                                                                                                                                                                              |
| Educational Requirements                     | Earning ASPPA's QKA credential requires successful completion of the following exams: <ul style="list-style-type: none"> <li>• Retirement Plan Fundamentals Part 1 (RPF-1)</li> <li>• Retirement Plan Fundamentals Part 2 (RPF-2)</li> <li>• Defined Contribution Administrative Issues – Basic Concepts (DC-1)</li> <li>• Defined Contribution Administrative Issues – Compliance Issues (DC-2)</li> </ul>                  |
| Examination Type                             | QKA Certification Examinations                                                                                                                                                                                                                                                                                                                                                                                               |
| Continuing Education/Experience Requirements | All credentialed members must acquire 40 hours of Continuing Professional Education (CPE) credits (2 of these must be Ethics) in a two-year-cycle as well as renew your ASPPA Membership annually to retain credentials.                                                                                                                                                                                                     |
| Investor Complaint Process                   | To make a complaint about any ASPPA member, please submit your information electronically to <a href="mailto:complaint@asppa.org">complaint@asppa.org</a> . Anonymous submissions will not be considered pursuant to ASPPA policy. Complaints will be considered according to ASPPA's Disciplinary Procedures.                                                                                                               |
| Public Disciplinary Process                  | To receive current and historic disciplinary information about any ASPPA member, submit the name of the member about whom you require this information to <a href="mailto:discipline@asppa.org">discipline@asppa.org</a> . Requests will be processed within three (3) business days of ASPPA's receipt.                                                                                                                     |
| Check Professional's Status Online           | QKA members searches can be can be run at: <a href="http://asppa.org/sp/Custom-Apps/Credentialed-Member-Search.aspx">http://asppa.org/sp/Custom-Apps/Credentialed-Member-Search.aspx</a>                                                                                                                                                                                                                                     |



**\*\* Information regarding professional designations:    Certified Financial Planner**

| CFP - Certified Financial Planner            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description                                  | <p>The Certified Financial Planner (CFP) designation is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards, Inc. (CFP Board) in the United States, Financial Planners Standards Council in Canada and 18 other organizations affiliated with Financial Planning Standards Board (FPSB), the international owner of the CFP mark outside of the United States.</p> <p>To receive authorization to use the designation, the candidate must meet education, examination, experience and ethics requirements, and pay an ongoing certification fee.</p> |
| Designation                                  | Certified Financial Planner                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Designation Status                           | Currently offered and recognized by the issuing organization                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Acronym                                      | CFP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Issuing Organization                         | <a href="#">Certified Financial Planner Board of Standards, Inc.</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Prerequisites/Experience Required            | <p>Candidate must meet the following requirements:</p> <ul style="list-style-type: none"> <li>• A bachelor's degree (or higher) from an accredited college or university, and</li> <li>• Three years of full-time personal financial planning experience</li> </ul>                                                                                                                                                                                                                                                                                                                                                       |
| Educational Requirements                     | <p>Candidate must complete a <a href="#">CFP-board registered program</a>, or hold <u>one</u> of the following:</p> <ul style="list-style-type: none"> <li>• CPA</li> <li>• ChFC</li> <li>• Chartered Life Underwriter (CLU)</li> <li>• CFA</li> <li>• Ph.D. in business or economics</li> <li>• Doctor of Business Administration</li> <li>• Attorney's License</li> </ul>                                                                                                                                                                                                                                               |
| Examination Type                             | CFP Certification Examination                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Continuing Education/Experience Requirements | 30 hours every two years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Investor Complaint Process                   | Online at <a href="#">Submit a Complaint</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Public Disciplinary Process                  | Online at <a href="#">Public Disciplinary Actions</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Check Professional's Status Online           | Online at <a href="#">Search for a Certified Financial Planner Professional</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Accredited By                                | <a href="#">National Commission for Certifying Agencies (NCCA)</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |