



**PART 2A FIRM ADV:
FIRM BROCHURE
MARCH 27, 2017**

FOR FURTHER INFORMATION, PLEASE CONTACT:

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WESCOTT
FINANCIAL ADVISORY GROUP LLC

This brochure provides information about the qualifications and business practices of Wescott Financial Advisory Group LLC. If you have any questions about the contents of this brochure, please contact Matthew Sgro, our Chief Compliance Officer, at 215.979.1692 or by email at msgro@wescott.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Wescott Financial Advisory Group LLC is available on the SEC's website at www.adviserinfo.sec.gov. You can search the SEC website by a unique identifying number, known as a CRD number. Our firm's CRD number is 105989.

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Item 2 – Material Changes

In this Item, the Firm is required to discuss any material changes that have been made to the brochure since the last annual amendment dated March 30, 2016. This brochure has been amended to reflect the fact that Wescott Financial Advisory Group LLC now participates in the Schwab Advisor Network client referral program, as described in more detail in Item 14 (“Clients Referrals and Other Compensation”). This brochure has also been amended to reflect the fact that Wescott has custody of client assets by virtue of the fact that its affiliate, Wescott Private Equity LP, is deemed to have custody of assets invested in Wescott Multi-Strategy Private Equity, LP. See Item 15 (“Custody”).

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Item 4 – Advisory Business

Firm Description:

Founded in 1987, Wescott Financial Advisory Group LLC is an SEC-registered, fee-only investment advisory and wealth management firm with its principal places of business located in Pennsylvania and Florida. Wescott's clients are high net worth individuals, families, trusts, foundations, pension plans, pooled investment vehicles, corporations and other business and institutions. The Firm's investment philosophy is a uniquely disciplined, tax sensitive and opportunistic "open architecture, multi- manager (passive and active management)" approach that has been maintained for over 25 years.

Listed below are the Firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Grant Rawdin;
- Wescott Holding Company LLC. Wescott Holding Company LLC is the company through which Duane Morris LLP, a law firm, owns its interest in Wescott Financial Advisory Group LLC.

Advisory Services:

Wealth Management Program

Our Firm offers ongoing financial planning and investment advice to our clients based upon the individual needs of the client. Through discussion with our clients, we come to understand our client's objectives, goals and particular circumstances. We then develop a client's personal Investment Policy, recommending and managing a portfolio based upon that policy. During our data-gathering process we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, professional experience and occupation as well as family situation and background.

Different types of investments involve a variety of risks. We strive to explain the nature of the risks that a client will have in their portfolio. These risks may be in the stock or bond portfolio and may involve the volatility of the portfolio, risk to principal, illiquidity, lack of marketability (the ability to sell an asset at a particular time at a "fair" price) and a host of other risks that every investor faces, but about which an investor should be aware.

Our recommendations, then, are based upon our client discussions and analyses. In the Investment Policy Statement, provided to our clients for their approval before we invest their portfolio, we describe many of the risks and provide a range of losses that a client may experience with the investment objective recommended and approved by the client. These loss possibilities are meant to illustrate the volatility of the stock and bond markets.



It is very important that we are aware of changes to a client's situation that might impact our current and future recommendations. There are many actions we take to elicit information from clients about these changes. Some of these actions follow:

1. Provide detailed quarterly written reports to each client providing updated specific portfolio performance and asset allocation information, with recommendations for changes, including our Investment Commentary and outlook;
2. At least annually, contact each client to determine whether there have been any material changes in the client's financial or personal situation or investment objectives, and whether the portfolio and investment strategy require adjustments to meet with client wishes and needs;
3. Be reasonably available to consult with the client; and
4. Maintain up-to-date client Investment Policy Statements and amendments in each client's file.

Our investment recommendations are not limited to any specific product or service offered by a broker dealer or insurance company and will generally include advice regarding the advisability of owning the following securities:

- Exchange-listed securities
- Securities traded over-the-counter
- Foreign issuers
- Corporate debt securities (other than commercial paper)
- Commercial paper
- Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States governmental securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Interests in partnerships investing in other businesses



Use of Independent Managers

The Firm selects or recommends certain third party independent managers (“Independent Managers”) to actively manage a portion of its clients’ assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager. In addition to this brochure, clients may also receive the written disclosure documents of the respective Independent Managers engaged to manage their assets.

The Firm evaluates a variety of information about Independent Managers, which may include the Independent Managers’ public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers’ investment strategies, past performance and risk results in relation to its clients’ individual portfolio allocations and risk exposure. The Firm may also take into consideration each Independent Manager’s management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

The Firm continues to provide services relative to the discretionary or non-discretionary selection or recommendation of the Independent Managers. On an ongoing basis, the Firm monitors the performance of those accounts being managed by Independent Managers, and seeks to ensure their strategies and target allocations remain aligned with its clients’ investment objectives and overall best interests.

Entrada Management Program

Our Firm developed the *Entrada Management Program* to provide investment management services for those clients with investable assets below \$2 million. The Entrada portfolio retains Wescott’s hallmark of a strategic, disciplined and diversified portfolio blending the advantages of passive investing with active management. Entrada combines its investment management service into a coordinated and efficient process of needs assessment, account suitability, account administration, portfolio rebalancing, portfolio reporting and tax optimization.

Financial Planning

We offer financial planning services as part of our Wealth Management Program. Financial planning is a comprehensive evaluation of a client’s current and future financial state by using currently known information and, what we believe to be, reasonable variables to predict future cash flows, asset values and withdrawal plans.

Through the financial planning process, questions, information and analysis are considered as they impact and are impacted by the entirety of a client’s financial and personal situation. Clients for whom these services are provided receive a written report that provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan may address any or all of the following areas:

- *Personal*: We review family records, budgeting, personal liability, estate information and financial goals.



- *Cash Flow & Tax Planning:* We analyze a client's projected cash flows that considers income from earned income, pensions, retirement plan distributions and other income from investment portfolios or through other sources. We subtract a client's projected expenses, including projected income taxes, from the income sources to illustrate whether a client is spending more or less than their income. We then project the trend of this annual cash flow pattern to illustrate whether this pattern of spending in relation to income may be sustainable for the client's lifetime.
- *Investments:* We analyze investment alternatives and their effect on the client's portfolio.
- *Insurance:* We review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.
- *Retirement:* We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- *Death & Disability:* We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- *Estate:* We assist our clients in assessing and developing long-term estate planning strategies, be they for planning in reducing estate taxes or to ensure that a client leaves assets in a fashion that assures they will be available for heirs in a protected and organized fashion. Such analysis and recommendations may include the examination, analysis and recommendation of and for living, irrevocable and testamentary trusts, wills and codicils, durable powers of attorney, asset protection plans, long term care facility planning and elder law.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report.

Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent and other advisors as appropriate. Implementation of financial plan recommendations is entirely at the client's discretion; we are available to our clients to assist them in the implementation of these recommendations.

If a financial plan is contracted for such analysis separately from the plan included in the Wealth Management Program, then the financial plan is presented to the client within six months of the contract date.

General Business Planning: We provide business-planning advice to individual and corporate clients and will represent clients in financial negotiations including business acquisitions, sales and mergers. Such consulting services are generally provided at an agreed upon fee that is in addition to our Wealth Management Program fee.



Pension Consulting Services

Wescott also provides advisory services to pension, profit sharing and 401(k) plans. Pension Consulting Services are comprised of three distinct services. Clients may choose to use any or all of these services:

Selection of Investment Vehicles and Asset Allocation Models:

We assist plan sponsors in constructing appropriate asset allocation models and recommend specific investment vehicles.

Monitoring of Investment Performance:

Wescott continuously monitors the performance of recommended investment managers and recommends changes to plan sponsors, as appropriate.

Employee Communications:

For pension, profit sharing and 401(k) plan clients with individual plan participants exercising control over assets in their own account ("self-directed plans"), we provide an annual report covering mutual fund manager performance and annual educational support designed for plan participants. The nature of the topics covered are determined in consultation with plan sponsors under the guidelines established in ERISA Section 404(c). The educational support and investment workshops do not provide plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

Trustee Services

Wescott Trust Services provides trust solutions for clients whose financial, family, or business needs require the services of a professional fiduciary. Wescott Trust Services is a trust representative of National Advisors Trust Company, a federally chartered trust company regulated by the Office of the Comptroller of the Currency (OCC), a bureau of the U.S. Treasury Department, and is authorized to do business in all 50 states. As Wescott Financial Advisory Group LLC is a shareholder in National Advisors Trust Company (Wescott Financial Advisory Group LLC owns less than .25% of NATC), clients should consider whether the recommendation by Wescott to use Wescott Trust Services is a conflict of interest.

Assets Under Management

As of 12/31/2016, we were actively managing \$1,883,809,260, of which \$1,471,427,283 are managed on a discretionary basis plus \$412,381,977 are managed on a non-discretionary basis.

Item 5 – Fees and Compensation

Wealth Management Program

The annual fee for our Wealth Management Program and Investment Management Services are charged as a percentage of assets under management, according to the following schedule:

- 1.25% on the first \$2 million
- 1.00% on the next \$3 million



- 0.75% on the next \$2 million
- 0.50% thereafter

A minimum of **\$2,000,000** of assets under management is required for this service. This minimum account size may be negotiable under certain circumstances, but may still be subject to a \$25,000 minimum fee. Wescott Financial Advisory Group LLC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Fees are billed at the start of engagement, at each subsequent calendar quarter, in advance, based upon the value of the investment portfolio at the end of the prior calendar quarter.

Limited Negotiability of Advisory Fees: Although Wescott Financial Advisory Group LLC has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances, relationships, and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the advisor and each client.

Entrada Program

The annual fee for our Entrada Program and Investment Management Services are charged as a percentage of assets under management, according to the following schedule:

- 1.25% on all assets under management.

A minimum of **\$250,000** of assets under management is required for this service. This minimum account size may be negotiable under certain circumstances, but may still be subject to a \$3,125 minimum fee. Wescott Financial Advisory Group LLC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Fees are billed at the start of engagement, at each subsequent calendar quarter, in advance, based upon the value of the investment portfolio at the end of the prior calendar quarter.

Pension Consulting Fees

The annual fee for our Pension Consulting Services are charged as a percentage of assets under management, according to the following schedule:

- 1.25% on the first \$2 million
- 1.00% on the next \$3 million
- 0.75% on the next \$2 million
- 0.50% thereafter



A minimum of **\$2,000,000** of assets under management is required for this service. The minimum account size and fee may be negotiable under certain circumstances. Plan sponsors are billed at the start of engagement, at each subsequent calendar quarter, in advance, based upon the value of the investment portfolio at the end of the prior calendar quarter. This minimum fee may prevent Wescott Financial Advisory Group LLC from providing services to small ERISA plans.

Financial Planning Fees

Financial Plan fees are based upon hourly rates (currently \$150 - \$750) times the number of hours anticipated to complete the plan. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship. There is a \$7,500 minimum plan fee. Fifty percent (50%) of the plan fee is due at engagement with the balance due at plan completion. In the event a client terminates the financial planning engagement, a full refund of any fees will be provided, if written notice is within 5 days of engagement. After 5 days from engagement, fees collected will be applied to time spent, with the balance, if any, refunded to the client.

Trust Service Fees

The annual fee for Trustee Services through Wescott Trust Services are charged as a percentage of assets under management, according to the following schedule:

- 0.50% on the first \$2 million
- 0.45% on the next \$3 million
- 0.30% thereafter

A minimum of **\$750,000** of assets under management is required for this service. Trustee fees are in addition to the investment advisory fees of Wescott Financial Advisory Group LLC.

Discretionary Waiver of Minimum Account Fees

Wescott Financial Advisory Group LLC may, in its sole discretion, elect to waive its minimum fee for any of the aforementioned services based upon certain criteria, including anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, and pro bono activities.

General Information

Termination of the Advisory Relationship: A client may terminate the engagement at any time by written notice. Quarterly fees billed in advance are generally deemed earned through the end of the calendar quarter to account for the ongoing time and responsibility for transitioning accounts, portfolio reporting for that final quarter, tax basis reporting, capital gain and loss worksheet reporting and other services that we might provide. Any unearned fees are refunded to the clients.



Mutual Fund Fees: All fees paid to Wescott Financial Advisory Group LLC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. Such fees and expenses are described in each fund's prospectus and none are paid to Wescott. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. Wescott does not use funds that impose sales charges. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our Firm which are designed, among other things, to assist the client in determining which managers or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the managers and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Independent Manager Fees: Clients whose assets are allocated to Independent Managers may be charged various program fees in addition to the advisory fee charged by our Firm. Such fees include the investment advisory fees of the Independent Managers. We will review with clients any fees charged by Independent Managers that will be charged to clients.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for other costs and expenses, including, without limitation, securities brokerage commissions, transaction fees, custodial fees, fees attributable to alternative assets, reporting charges, margin costs, 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. Please refer to Item 12 for more regarding Wescott Financial Advisory Group LLC's brokerage practices.

ERISA Accounts: Wescott Financial Advisory Group LLC is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our Firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation.

As Wescott Financial Advisory Group LLC does not receive any commissions or 12b-1 fees, we do not engage in prohibited transactions.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisors for similar, higher or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1200 more than six months in advance of services rendered.

The Firm generally recommends that clients utilize the brokerage and clearing services of certain financial institutions for investment management accounts as described in more detail in Item 12 below.

Clients generally provide the Firm with the authority to directly debit their accounts for payment of the Firm's investment advisory fees. Those financial institutions that serve as qualified custodians for client accounts have agreed to send statements to clients not less than quarterly detailing all account transactions, including any amounts paid to the Firm.



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

Not applicable. Wescott Financial Advisory group LLC does not charge performance-based fees for managing client accounts.

Item 7 – Types of Clients

Wescott Financial Advisory group LLC provides advisory services to the following types of clients:

- High net worth individuals
- Individuals (other than high net worth individuals)
- Pension and Profit Sharing Plans (other than plan participants)
- Pooled investment vehicles
- Charitable organizations
- Corporations or other businesses not listed above

As previously disclosed in Item 5, our Firm has established certain minimum account requirements to maintain an account, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service. Certain Independent Managers may impose more restrictive account requirements and billing practices from the Firm.

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

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis: Our dedicated Investment Research Group is vigilant in evaluating the composition and performance of our investment allocation models, selected stock and bond managers and other investment vehicles. We take both a qualitative (“the strategy and discipline of a manager”) and quantitative (numeric analysis and rankings) approach.

Our team constantly analyzes the value of each of our core securities (e.g. separate accounts or mutual funds) by looking at a variety of style, economic, performance and financial factors. These factors include the overall economy, industry conditions, sector characteristics, relevant benchmarks, comparative holdings, the philosophy behind a manager’s buying and selling discipline, risk factors, financial condition and overall staffing and management of the investment company itself. This helps us determine and recommend if a selected manager or security is performing in a manner consistent with our expectations and the ongoing needs of our clients. A style of “fundamental analysis” does not anticipate market movements by market timing. This presents a potential risk, as the price of a fund or security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.



Risks for all forms of analysis: Our securities analysis methods rely on the assumption that the managers whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases: We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this strategy when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Risk of Loss: Securities investments are not guaranteed and you may lose money on your investments. We require a client to help us understand their tolerance for risk.

Underwriting of Certain Due Diligence Expenses

During the course of Wescott research staff's independent due diligence of managers recommended for investment to Wescott clients, there are limited occasions when benefits are provided to Wescott by the manager. These benefits entail direct travel expenses (airfare, hotel and meals) related to attending a manager due diligence conference

Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Wescott Financial Advisory Group LLC or the integrity of Wescott's management.

Wescott Financial Advisory Group LLC and our management personnel have no reportable disciplinary events to disclose.



Item 10 – Other Financial Industry Activities and Affiliations

The law firm of Duane Morris LLP has an ownership interest in Wescott Financial Advisory Group LLC. No Wescott client is ever required to engage Duane Morris LLP for legal services, although a referral to Duane Morris LLP may be made for appropriate legal services if requested. A conflict of interest exists as a result of this recommendation because of Duane Morris LLP's ownership interest in Wescott Financial Advisory Group LLC. Wescott respects all clients' legal advisor relationships and commonly works with their chosen legal counsel. Duane Morris LLP may refer clients to Wescott for financial planning and investment management services if it believes that it may be appropriate to its client's situation.

Wescott Financial Advisory Group LLC members created Wescott Private Equity LLC ("WPE") in June 2004. Wescott Private Equity, LLC is a General Partner in Wescott Multi-Strategy Private Equity, L.P. ("WMSPE"). WMSPE was created to invest \$2,000,000 in a private equity fund. The underlying private equity investment fund invests in distressed, underperforming, insolvent or reorganizing assets or businesses in a variety of industries. Another underlying private equity fund participates in the acquisition, development, ownership and operation of real estate projects, primarily community and neighborhood retail centers located in the Northeastern and Mid-Atlantic regions of the United States. Interests in WMSPE are privately offered pursuant to Regulation D under the Securities Act of 1933, as amended. The Private Fund currently relies on an exemption from registration under the Investment Company Act of 1940, as amended. Participation as an investor in WMSPE is restricted to investors that are "accredited investors" as defined under Rule 501 of the Securities Act of 1933, as amended. All relevant information, terms and conditions relative to WMSPE, including suitability, risk factors, and potential conflicts of interest, are set forth in the offering documents for WMSPE, which each investor is required to receive and/or execute prior to being accepted as an investor in WMSPE. Where appropriate, Wescott Financial Advisory Group LLC recommends that its eligible clients invest in WMSPE. Wescott Financial Advisory Group LLC has no direct ownership interest in WMSPE, and its clients are not charged fund management fees by WPE when investing in WMSPE.

Wescott Financial Advisory Group LLC and our affiliates are not restricted from forming additional investment funds, entering into other investment advisory relationships or engaging in other business activities, even though such activities may involve substantial time and resources of our Firm and our affiliates. Potentially, such activities could be viewed as creating conflicts of interest in that the time and effort of our management personnel and employees will not be devoted exclusively to our primary advisory practice but would instead be allocated across a variety of business interests.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Our Firm has adopted a Code of Ethics, pursuant to Rule 204A-1 of the Investment Advisors Act of 1940, which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Wescott Financial Advisory Group LLC and our personnel owe a duty of loyalty, fairness and good faith toward our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code of Ethics.



Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Wescott Financial Advisory Group LLC's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to Matthew Sgro, Chief Compliance Officer, at msgro@wescott.com, or by calling him at 215-979-1692.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees 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.

Our Firm and/or individuals associated with our Firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients.

It is the expressed policy of our Firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our Firm's Code of Ethics, to ensure our Firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our Firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our Firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. It is the expressed policy of our Firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
4. Our Firm requires prior approval for any IPO or private placement investments by related persons of the Firm.
5. We maintain a list of all reportable securities holdings for our Firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our Firm's Chief Compliance Officer or his/her designee.



6. We have established procedures for the maintenance of all required books and records.
7. Clients can decline to implement any advice rendered, except in situations where our Firm is granted discretionary authority.
8. All of our principals and employees must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
9. We require delivery and acknowledgement of the Code of Ethics by each supervised person of our Firm.
10. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
11. Any individual who violates any of the above restrictions may be subject to termination.

Item 12 – Brokerage Practices

For discretionary clients, Wescott Financial Advisory Group LLC requires clients to provide us with written authority to establish the custodian to use for transactions. Clients must include any limitations on this discretionary authority in the written authority statement. Clients may change or amend these limitations as required. Such amendments must be provided to us in writing.

Wescott recommends that clients in the Wealth Management Program utilize National Financial Services LLC, Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity"), Pershing Advisor Solutions ("Pershing"), TD Ameritrade ("TD"), Schwab Advisor Services, a division of Charles Schwab & Co. Inc. ("Schwab") (all FINRA registered custodians and members of SIPC) or National Advisors Trust Company ("NAT"), to maintain custody of client's assets and to effect trades for their accounts. Wescott Financial Advisory Group LLC is independently owned and operated and not affiliated with Schwab, Pershing, TD, or Fidelity. Wescott Financial Advisory Group LLC does own a less than quarter of 1% interest in National Advisors Trust Company. As a result, a conflict of interest exists when Wescott Financial Advisory Group LLC recommends the services of National Advisory Trust Company because of this ownership interest.



Although the Firm does not frequently arrange for the execution of client trades, the Firm does so on a limited basis and is committed to ensuring that clients receive best execution with respect to such transactions. Factors which the Firm considers in recommending any broker-dealer to clients include, among other things, their respective financial strength, reputation, execution, pricing, research and service. The commissions and/or transaction fees charged by these financial institutions may be higher or lower than those charged by other financial institutions. The commissions paid by the Firm's clients comply with the Firm's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where the Firm determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution's services, including among others, the value of research provided, execution capability, commission rates and responsiveness. The Firm seeks competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions. The Firm periodically and systematically reviews its policies and procedures regarding its recommendation of financial institutions in light of its duty to obtain best execution. The client may direct the Firm in writing to use a particular financial institution to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that financial institution, and the Firm will not seek better execution services or prices from other financial institutions. As a result, the client may pay higher commissions or other transaction costs, greater spreads transaction costs (i.e., brokerage commissions and spreads) or may receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, the Firm may decline a client's request to direct brokerage if, in the Firm's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Wescott has negotiated institutional commission rates with Fidelity, Pershing, TD, Schwab and National Advisor Trust Company ("Custodian") that we believe to be favorable to our clients. Additionally, it is efficient for our clients to utilize the custody and brokerage services of these firms as our ongoing working relationships insure that issues which may arise are promptly and efficiently resolved to the client's benefit.

It should be noted that there is no compensation, direct or indirect, "hard" or "soft" paid to Wescott by the Custodian for customer referrals made to the Custodian. Certain benefits may be provided by the Custodian if such benefits are directly related to the Custodian. For example, there may be a registration waiver for custodian sponsored conferences, custodian executives or other employees may speak at Firm client events at no fee and industry training conferences conducted and/or sponsored by the Custodian may be offered at no charge.

The Custodian provides Wescott Financial Advisory Group LLC with access to its institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them as long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at the Custodian institutional level. As a result, a conflict of interest exists because these asset thresholds create an incentive for Wescott Financial Advisory Group LLC to recommend the Custodian that imposes such asset thresholds as a condition of receiving certain benefits. Nonetheless, these services are not contingent upon our Firm committing to the Custodian any specific amount of business (assets in custody or trading commissions). The Custodian brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.



For our client accounts maintained in its custody, the Custodian generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction- related or asset-based fees for securities trades that are executed through each Custodian or that settle into the Custodian accounts.

The Custodian also makes available to our Firm other products and services that benefit Wescott Financial Advisory Group LLC but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at each Custodian.

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

1. Provide access to client account data (such as trade confirmations and account statements);
2. Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
3. Provide research, pricing and other market data;
4. Facilitate payment of our fees from clients' accounts; and
5. Assist with back-office functions, recordkeeping and client reporting.

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

1. Compliance, legal and business consulting;
2. Publications and conferences on practice management and business succession;
3. Access to employee benefits providers, human capital consultants and insurance providers.

Each Custodian may make available, arrange and/or pay third-party vendors for the types of services rendered to Wescott Financial Advisory Group LLC. Each Custodian may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our Firm. Each Custodian may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that clients custody their assets at each Custodian, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by each Custodian, which may create a potential conflict of interest.



Item 13 – Review of Accounts

Investment Management Services

REVIEWS: While the underlying securities within Investment Management Services accounts are continually monitored, client accounts and Investment Portfolios are reviewed at least quarterly. Accounts are reviewed for the investment objectives and guidelines of each client's investment strategy and ongoing Wealth Management requirements. More frequent reviews may take place due to material changes in such matters as the client's individual circumstances, or the market, political or economic environment. Changes may be recommended as a result of client requests or needs, manager changes, liquidity needs, model allocation changes, rebalancing or tax considerations.

There are six principal reviewers: Grant Rawdin, President & CEO, Lydia Sheckels, Chief Investment Officer, David Lafferty, Principal and Senior Financial Advisor, Scott Michalek, Principal and Senior Financial Advisor, Stephanie James, Senior Financial Advisor, and Sandra Goodstein, Managing Director Fort Washington and Senior Financial Advisor. Reviews are in accordance with review standards stated above and serve to ensure that each client's portfolio is invested in a manner consistent with the client's written Investment Policy Statement.

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their custodian, we provide quarterly reports summarizing account performance, balances and holdings. These reports remind the client to notify us if there have been changes in the client's financial situation or investment objectives and whether the client wishes to impose investment restrictions or modify existing restrictions.

Pension Consulting Services

REVIEWS: While the underlying securities within Pension Consulting Accounts are continually monitored, Wescott Financial Advisory Group LLC reviews the investment options of the plan at least on a quarterly basis. These accounts are reviewed by Lydia Sheckels, Chief Investment Officer or David Lafferty, Principal and Senior Financial Advisor.

REPORTS: Pension Consulting clients will generally receive reports from a custodian or Third Party Administrator (TPA) as contracted for by the plan administrator. In addition, Wescott provides the Plan Administrator with an annual report covering overall manager performance, general commentary and outlook and information regarding any changes to asset allocation models.

Financial Planning Services

REVIEWS: Financial Planning Reviews and Plan Updates occur at different intervals depending on the evolving needs of the client.

REPORTS: Reports and/or Plan Updates covering such issues as long-term cash flow, investments, estate and tax planning issues, insurance, retirement and/or charitable giving are provided as requested and/or recommended to support ongoing wealth management planning.



Item 14 – Client Referrals and Other Compensation

Wescott Financial Advisory Group LLC seeks the referral of clients to our advisory firm. Wescott created Wescott Professional Alliance a referral program with licensed CPAs and legal professionals for the purpose of revenue sharing and collaborating.

Wescott Financial Advisory Group LLC participates in the Fidelity Wealth Advisor Solutions Program (the “WAS Program”), through which Wescott Financial Advisory Group LLC receives client referrals from Strategic Advisors, Inc. (SAI), a registered investment advisor and subsidiary of FMR LLC, the parent company of Fidelity Investments. Wescott Financial Advisory Group LLC is independent and not affiliated with SAI or FMR LLC. SAI does not supervise or control Wescott Financial Advisory Group LLC, and SAI has no responsibility or oversight for Wescott Financial Advisory Group LLC’s provision of investment management or other advisory services.

Under the WAS Program, SAI acts as a solicitor for Wescott Financial Advisory Group LLC, and Wescott Financial Advisory Group LLC pays referral fees to SAI for each referral received based on Wescott Financial Advisory Group LLC’s assets under management attributable to each client referred by SAI or members of each client’s household. The WAS Program is designed to help investors find an independent investment advisor, and any referral from SAI to Wescott Financial Advisory Group LLC does not constitute a recommendation or endorsement by SAI of Wescott Financial Advisory Group LLC’s particular investment management services or strategies. More specifically Wescott Financial Advisory Group LLC pays a fee of 0.20% of the referred client’s assets under management. These referral fees are paid by Wescott Financial Advisory Group LLC and not the client.

To receive referrals from the WAS Program, Wescott Financial Advisory Group LLC must meet certain minimum participation criteria, but Wescott Financial Advisory Group LLC may have been selected for participation in the WAS Program as a result of its other business relationships with SAI and its affiliates, including Fidelity Brokerage Services, LLC (“FBS”). A conflict of interest exists because Wescott Financial Advisory Group LLC’s desire to continue participating in the WAS Program creates an incentive for the Firm to retain certain affiliates of SAI, including FBS, for execution, custody and clearing for its clients, whether or not those clients were referred to Wescott Financial Advisory Group LLC as part of the WAS Program. Under an agreement with SAI, Wescott Financial Advisory Group LLC has agreed that it will not charge clients more than the standard range of advisory fees disclosed in its Form ADV 2A Brochure to cover solicitation fees paid to SAI as part of the WAS program. Pursuant to these arrangements, Wescott Financial Advisory Group LLC has agreed not to solicit clients to transfer their brokerage accounts from affiliates of SAI or establish brokerage accounts at other custodians for referred clients other than when Wescott Financial Advisory Group LLC’s fiduciary duties would so require; therefore, a conflict of interest exists where Wescott Financial Advisory Group LLC has an incentive to suggest that referred clients and their household members maintain custody of their accounts with affiliates of SAI. However, participation in the WAS Program does not limit Wescott Financial Advisory Group LLC’s duty to select brokers on the basis of best execution.

Wescott Financial Advisory Group LLC also receives client referrals from Schwab through our participation in Schwab Advisor Network® (“the Service”). The Service is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with Wescott Financial Advisory Group LLC. Schwab does not supervise Advisor and has no responsibility for our management of clients’ portfolios or our other advice or services. Our Firm pays Schwab fees to receive client referrals through the Service. Our Firm’s participation in the Service may raise potential conflicts of interest described below.



Wescott Financial Advisory Group LLC pays Schwab a Participation Fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian. The Participation Fee paid by us is a percentage of the fees the client owes to us or a percentage of the value of the assets in the client's account, subject to a minimum Participation Fee. Our Firm pays Schwab the Participation Fee for so long as the referred client's account remains in custody at Schwab. The Participation Fee is billed to us quarterly and may be increased, decreased or waived by Schwab from time to time. The Participation Fee is paid by our Firm and not by the client. Our Firm has agreed not to charge clients referred through the Service fees or costs greater than the fees or costs we charge clients with similar portfolios who were not referred through the Service.

Wescott Financial Advisory Group LLC generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from Schwab. This Fee does not apply if the client was solely responsible for the decision not to maintain custody at Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Advisor generally would pay in a single year. Thus, we will have an incentive to recommend that client accounts be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees will be based on assets in accounts of our clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, we will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts and execute transactions at Schwab and to instruct Schwab to debit our fees directly from the accounts.

For accounts of our clients maintained in custody at Schwab, Schwab will not charge the client separately for custody but will receive compensation from our clients in the form of commissions or other transaction-related compensation on securities trades executed through Schwab. Schwab also will receive a fee (generally lower than the applicable commission on trades it executes) for clearance and settlement of trades executed through broker-dealers other than Schwab. Schwab's fees for trades executed at other broker-dealers are in addition to the other broker-dealer's fees. Thus, we may have an incentive to cause trades to be executed through Schwab rather than another broker-dealer. We nevertheless, acknowledge our duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for our other clients. Thus, trades for accounts custodied at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers. Please see "Brokerage Practices" (Item 12) for more information.

Wescott Financial Advisory Group may refer clients to other service professionals if requested or deemed necessary, based on the specific needs of the client. For example, Wescott may refer clients to legal counsel or accountants. It is possible that these professionals may, in turn, make referrals of their clients seeking investment advice to Wescott. There is no compensation paid by either party for such referrals.

Wescott Financial Advisory Group LLC does not accept or allow our related-persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.



Item 15 – Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this brochure that our Firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements against the information provided on their custodial statements to ensure that all information is accurate and complete.

Our Firm does not maintain physical custody of client assets; client assets are custodied by the custodians listed in Item 12. Nonetheless, our Firm is deemed to have custody of client funds for several reasons. First, the Firm has the ability to authorize the custodians to debit its annual management fee but otherwise has no ability to access client funds. Second, WPE is deemed to have custody of the assets of WMSPE. WMSPE is subject to an annual audit, and the financial information from the audit is distributed to WMSPE investors.

Item 16 – Investment Discretion

In certain circumstances, clients hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our Firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.



Item 17 – Voting Client Securities

Where authorized by clients, Wescott Financial Advisory Group, LLC votes proxies on behalf of its clients. Wescott obtains recommendations from a third party as to how proxies should be voted. The third party, Broadridge, is an independent firm that specializes in analyzing shareholder voting issues, including the provision of widely-followed corporate governance policies and recommendations on specific matters. Wescott will follow the recommendations of Broadridge when those recommendations appear to be consistent with sound corporate governance and are designed to maximize shareholder value. We consider any material conflicts of interest that could arise as a result of voting client proxies are adequately mitigated by relying upon the recommendations of Broadridge. Where Wescott Financial Advisory Group LLC is responsible for voting proxies on behalf of a client, the client may not direct the Firm's vote on a particular solicitation. Nonetheless, the client can revoke the Firm's authority to vote proxies.

Clients may request information regarding the specific proxies voted by contacting Matthew Sgro, the Chief Compliance Officer at 215-979-1692 or msgro@wescott.com.

Item 18 – Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

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

Wescott Financial Advisory Group LLC has not been the subject of a bankruptcy petition at any time during the past ten years, or in its history.

