



Disclosure Brochure

August 29, 2017

8030 Excelsior Drive, Suite 307
Madison, Wisconsin 53717
(608) 960-4616

www.wiscap.com

This Disclosure Brochure provides information about the qualifications and business practices of Wisconsin Capital Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (608) 960-4616. 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.

Wisconsin Capital Management, LLC is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

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

Item 2 – Material Changes

Please see the following summary of material changes made to our Brochure (Form ADV Part 2A) since our last annual update on August 24, 2016:

Item 4 – Advisory Business

Wisconsin Capital Management, LLC (“WisCap”) updated Item 4 to disclose a key-man risk that also applies to Item 8. The risk arose after one of WisCap’s two portfolio managers departed his position, leaving WisCap with only one portfolio manager.

WisCap has removed information regarding a sub- contract it had with affiliated advisor SVA Plumb Wealth Management, LLC (“SVAP WM”) for trading and administrative services. That contract is no longer in place.

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

This item was also updated to disclose the key-man risk referenced above under Item 4.

Item 10 – Other Industry Activities and Affiliations

In addition to no longer receiving trading and administrative services from SVAP WM, WisCap also does not receive investment, research, or consulting services from SVAP WM. This brochure omits as inapplicable previous disclosures about certain WisCap employees being separately licensed insurance intermediaries able to earn a commission.

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

This item was updated to remove references to employees of an affiliate being considered access persons as a result of services provided to WisCap by the affiliate

Item 12 – Brokerage Practices

The trade aggregation and allocation practices were updated in light of the fact that an affiliate no longer trades on behalf of certain client accounts.

Item 15 – Custody

This item was updated to reflect that WisCap no longer has custody of client accounts except to the extent advisory fees are deducted directly from client accounts.

Item 3 -Table of Contents

Item 2 – Material Changes.....	2
Item 3 -Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	5
Item 6 – Performance-Based Fees and Side-By-Side Management.....	7
Item 7 - Types of Clients.....	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	8
Item 9 – Disciplinary Information	12
Item 10 – Other Financial Industry Activities and Affiliations.....	12
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	13
Item 12 – Brokerage Practices.....	14
Item 13 – Review of Accounts.....	19
Item 14 – Client Referrals and Other Compensation.....	20
Item 15 – Custody	20
Item 16 – Investment Discretion	20
Item 17 – Voting Client Securities.....	21
Item 18 – Financial Information.....	22
Exhibit A – Privacy Notice.....	23

Item 4 – Advisory Business

Established in 1984, Wisconsin Capital Management, LLC (“WisCap”) provides investment management services on a discretionary basis for the portfolios of primarily individual and high net-worth individual clients. WisCap also provides management services to the Plumb Balanced Fund and the Plumb Equity Fund (collectively, the “Plumb Funds”). WisCap is principally owned by TGP, Inc., which is wholly and directly owned by Thomas G. Plumb. Thomas G. Plumb is President of, and sole Portfolio Manager for, WisCap. The firm does not have any other fully dedicated staff. Thus, should Mr. Plumb become incapacitated or otherwise unable to fulfill his portfolio management responsibilities, WisCap’s clients could suffer a discontinuation of service.

In addition to owning WisCap, TGP, Inc., is a minority owner in SVA Plumb Financial, LLC (“SVAPF”). SVAPF owns an affiliated investment advisor SVA Plumb Wealth Management, LLC (“SVAP WM”). See Item 10 for further ownership and business affiliates information.

Investment Management Services

At the time of engagement, WisCap reviews each client’s financial assets, investment needs, tolerance for risk, and investment objectives. From this initial overview, WisCap and the client develop specific objectives and guidelines for WisCap to follow while managing the client’s portfolio. Upon request, clients may impose reasonable restrictions on certain assets or certain types of assets.

WisCap thereafter exercises its discretion to determine what securities, when, and in what amounts, to buy or sell for its client. Investment portfolios are diversified across various styles and strategies, and can consist of any combination of securities, including mutual funds, exchange-traded funds (“ETFs”), individual equity and fixed income securities, and/or other investments. Clients receive information about their accounts from WisCap no less than quarterly, unless otherwise directed.

Upon request, WisCap will provide a new client with a complementary written initial financial plan that incorporates the client’s stated financial goals and objectives. In general, such written plans address the following areas: the client’s personal cash flow, taxes, education and/or retirement funding, and other investments.

“Wrap” Account Advisory Services

WisCap provides advisory services to clients in wrap fee programs that are sponsored by a bank or a broker-dealer (“wrap fee sponsor”). WisCap offers the same investment management strategies to clients in wrap fee programs as it does to any other client. In a wrap fee program, the client pays a bundled fee for an array of investment services, such as brokerage, advisory, research, custody, and management services. The client pays this bundled fee directly to the program sponsor, and WisCap receives a portion of it in payment for its services.

Mutual Fund Services

WisCap is the investment advisor to the Plumb Funds. WisCap may invest some or all of its clients' accounts in the Funds. As do its other clients, the Plumb Funds has granted WisCap the authority to effect securities transactions on the Funds' behalf. WisCap uses its discretion to effect transactions that it believes will achieve the capital appreciation objective of the Plumb Balanced Fund, and the long-term capital appreciation objective of the Plumb Equity Fund. WisCap has managed the Funds since its inception, subject to the oversight of the Funds' Board of Directors/Trustees. See Item 10 for additional information on WisCap's business affiliates and its role in managing the Funds.

Assets Under Management

As of 06/30/2017

WisCap Discretionary	\$70,405,078
WisCap Non-Discretionary	\$0

Item 5 – Fees and Compensation

Fees Related to Investment Management Services

The standard fee schedule shown below is negotiable, and will thus vary from client to client. Factors the firm considers in negotiating fees are: type of account, type of securities subject to management services, value of securities, anticipated nature and volume of trading, and special service requests by the client. Over the years it has been in business, WisCap has had other fee schedules in effect that may listed lower or higher fees than those outlined below. Based on the fee schedule in effect at the time of engagement, and the size of a particular account, WisCap clients may pay different fees. WisCap maintains policies and procedures for portfolio management, trade aggregation and allocation, and portfolio valuation to address potential conflicts of interest related to the differences in client fees.

Although subject to change at WisCap's discretion, fees are generally based upon the market value of assets under management as of the last business day of the previous quarter. Fees are due in advance of each new quarter. Clients may either receive fee invoices from WisCap, or have WisCap deduct fees from their accounts directly.

A conflict of interest arises for WisCap when a client's portfolio includes shares of the Plumb Funds. The value of a client's Plumb Funds shares does not factor into Wiscap's calculation of the client's advisory fee. Those assets are subject only to the Funds' expenses, which are paid from Funds' shareholder fees. (More information on the Funds' expenses and fees is available in its Prospectus.) WisCap's receives payment for its advisory services from the Funds' as one of the Funds' expenses. Depending upon in which Fund a WisCap client's account is invested, the fees for Funds ownership may be more or less than the advisory fee otherwise applicable to

that account. Clients can also purchase the Plumb Funds through other brokers or agents not affiliated with WisCap.

Either party to a WisCap investment management agreement can end the relationship with 30 days' advance written notice to the other party, unless otherwise dictated by the terms of the agreement. WisCap will return the fees a client has already paid for the days following the termination date until the end of that quarter, if any. A client's termination of an investment management agreement will not affect transactions WisCap has initiated on the client's behalf prior to the effective date of the termination.

WisCap's portfolio management fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. Item 12 of this brochure further describes the factors WisCap considers in selecting broker-dealers to recommend for client transactions, and for determining the reasonableness of a broker-dealer's compensation (e.g., commissions).

WisCap clients investing in mutual funds other than the Plumb Funds incur such other funds' internal management fees, which may reduce the net asset value of their shares. Those fees cover expenses such as advisory fees, which are deducted from the fund's reported performance. Depending on the fund and its share class offering, a client may be able to invest directly in a fund without incurring any sales or advisory fees. Each fund's prospectus will contain a complete explanation of the expenses it charges to its shareholders. Such charges, including brokerage fees and commissions, are exclusive of and in addition to WisCap's fee, and WisCap shall not receive any portion of these commissions, fees, and costs.

Standard Fee Schedule

WisCap generally charges clients a fee based on the value of assets under management.

Individually Managed Accounts

1.00% on the first \$1,000,000
0.90% on the next \$1,000,000
0.80% on the next \$2,000,000
0.70% on the next \$1,000,000
0.60% on assets over \$5 million

Fees Related to Wrap Account Management Services

WisCap's fee for wrap account management services ranges from 0.50% to 1.00% per year, and is payable according to the Client's agreement with the wrap program's sponsor.

Fees Related to Mutual Fund Services

The Plumb Funds pays for WisCap's advisory services monthly, in arrears, in an amount calculated at the annual rate of 0.65% of the value of each Fund's assets, less any fees waived or expenses reimbursed by WisCap when an expense limitation on Fund assets is in effect. WisCap also receives a monthly asset-based fee for its administrative services to the Funds. A

complete description of all operating expenses of each Fund may be found in the Plumb Funds' Prospectus, a copy of which is available by calling 1-866-987-7888.

Fees for Additional Services

Advisory accounts that do not utilize WisCap-recommended custodians for custody of their assets may have their fee schedule increased by 0.10%. WisCap charges for special services requested by a client based on the time, complexity, and responsibility involved. WisCap does not charge a termination fee for advisory accounts.

Account Valuation Practices

WisCap receives pricing information provided by the portfolio accounting system (WisCap's "Primary Pricing Source"). The Primary Pricing Source applies pricing from Charles Schwab & Co., Inc. ("Schwab") first in the hierarchy. For securities not priced by Schwab, a price will be obtained from another custodian as provided by the Primary Pricing Source. In cases where the Primary Pricing Source does not name a price for a security, WisCap will generally use a price provided by an outside pricing service (e.g. Bloomberg, or the "Secondary Pricing Source").

For those instances in which (a) both the Primary and Secondary pricing sources are unable to provide a price; or (b) WisCap's portfolio manager strongly believes the price received from the Primary and/or Secondary pricing sources does not reflect fair market value; or (c) a security has halted trading, WisCap's Valuation Committee will determine a fair value for such security. To make this determination, the Committee considers WisCap's knowledge of the security, current market conditions, and any other relevant information. No single factor is considered, nor method used, in determining the value of a security; the Committee makes every valuation decision on a case-by-case basis. WisCap aims to determine a price it believes it could reasonably receive upon a current sale of the particular security.

Fund Valuation Practices

The Plumb Funds' Accounting Agent, U.S. Bancorp Fund Services, determines the Funds' daily net asset values using the Funds' approved pricing procedures. When determining a fair value for securities held within the Funds, WisCap will work with an appropriate agent of the Funds to price the security in accordance with Funds' fair valuation policy and process.

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

WisCap does not charge any performance-based fees (fees based on a share of capital gains on, or capital appreciation of, a client's assets).

Item 7 – Types of Clients

WisCap provides investment management services to individuals, high net worth individuals, and registered mutual funds. WisCap will generally decline or terminate a client who imposes investment restrictions that WisCap believes will preclude the development of a consistent, long-term investment program for the client's account.

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

WisCap strives to provide strong absolute and relative long-term investment returns through a combination of capital appreciation and current income. Clients rely on WisCap to manage their assets and minimize portfolio volatility during market fluctuations.

In its investment selection process, WisCap seeks diversification by asset class, geography, capitalization, and industry. WisCap works closely with its clients to develop and tailor a portfolio appropriate to a client's financial objectives and risk profile. The individual securities and proprietary mutual funds WisCap manages serve as core holdings around which WisCap will add complementary assets, depending on client objectives.

Investment Process

As noted, WisCap works closely with clients to develop portfolios appropriate to a client's objectives. Clients consult with the Portfolio Manager who will work through a logical investment process to develop and maintain investment portfolios. Together, the client and Portfolio Manager define goals and objectives for the client's account, and determine the client's comfort with risks related to various levels of market volatility and asset quality.

Once the basic structure for a client account is established, the Portfolio Manager will produce an account investment policy statement for the client. The Portfolio Manager then generates an investment portfolio designed to meet the client's specific goals. The Portfolio Manager will monitor the client's investments, and meet with the client periodically to review the portfolio and determine whether changes are necessary or advisable.

Investment Strategies for Individual Securities

WisCap looks for growing companies that demonstrate a competitive advantage among industry peers, with reasonably priced stock, the purchase of which will fall into predetermined investable themes. WisCap focuses on identifying market inefficiencies and maintains a goal of outperforming over entire business cycles. WisCap believes analyzing and taking advantage of long-term investable themes, including organizations with sustained revenue and profit growth, produces an attractive risk-adjusted return for its clients.

WisCap seeks to invest in a diversified portfolio of companies that meet its investment criteria. WisCap utilizes a fundamental growth at reasonable prices investment strategy.

WisCap estimates security prices based on fundamental analysis that includes review of the issuer's balance sheet, cash-flow and income statements, and on beliefs about the competitive environment, product sustainability, market power, and management incentive structure. WisCap also analyzes the structural trends faced by the industry at both a micro and macro level, as it believes that even the best companies are influenced by such trends. WisCap typically invests in the securities of U.S. companies, but may also invest in foreign companies, usually through the purchase of American Depositary Receipts ("ADRs") and foreign companies that are dual listed on U.S. stock exchanges.

Depending on the client's investment objectives, risk tolerance, and market opportunities, WisCap supplements equity investments with fixed income investments and other suitable securities. Fixed income investments typically include investment-grade bonds and government securities. As with its equity selection, WisCap uses a research-based approach to purchase fixed income securities and other investments with the aim of augmenting a client's returns and reducing portfolio volatility. Investments in client accounts may include the following:

- Equities / Stocks
- Fixed Income / Bonds
- Cash Equivalents / Money Market Funds
- Preferred stocks
- Real estate investment trusts ("REITs"), publicly traded master limited partnerships ("MLPs"), royalty trusts
- American Depositary Receipts
- Index Funds/ Exchange Traded Funds ("ETFs")
- Mutual Funds

As part of a client's asset management plan, WisCap strategizes to lessen the potential tax exposure through asset allocation and selection. Specific investments depend on such factors as the client's particular tax situation, risk tolerance, time horizon, and account size. WisCap generally seeks to purchase securities with a long-term investment horizon.

Our selection strategies for individual securities:

Buy-strategy indicators:

- Favorable market/economic conditions for industry
- Strong balance sheets with high cash flows, which can be an indicator of a company's ability to self-fund new projects
- Experienced, capable, and prudently structured management team incentives

Sell-strategy indicators:

- Potential catalyst for recovery is no longer evident
- Deterioration of fundamentals not yet reflected in market price
- More compelling alternatives exist with a better expected return profile

Investment Strategy for Mutual Funds

WisCap selects mutual funds for its clients to achieve portfolio diversification and to complement the overall portfolio investment strategy. WisCap chooses funds from a wide assortment of funds available through institutional trading platforms. Mutual fund and exchange-traded fund selection criteria generally include: consistency of performance vs. peer group; risk-adjusted performance; consistency and longevity of management team; consistency of management style and avoidance of style drift; tax efficiency; and fund expenses. The Plumb Funds may be included in WisCap client portfolios when appropriate for diversification and as cost-effective

investments. Please see Item 10 for additional information regarding WisCap's role in managing the Plumb Funds.

WisCap uses various quantitative tools to research investment options, and monitors various academic and industry publications to identify trends and new products.

When investing in mutual funds for a client, WisCap monitors the selected funds to ensure that they remain as the most appropriate for achieving the client's investment strategy, replacing such funds as deemed necessary.

WisCap may receive research services from third parties, or through brokers or dealers, including some purchased through economic arrangement with such parties.

Risk of Loss

WisCap-selected investments are subject to the risks involved in all investing. Clients should be prepared to bear such risks, including the possible loss of some or the entire principal amount invested. There is no guarantee that the investments will appreciate during the time a client holds them, and some or all may depreciate in price. Past performance is not necessarily indicative of future results. WisCap cannot guarantee success in meeting its investment objectives.

WisCap's investment management strategy emphasizes diversification to mitigate and manage risk. Diversification includes geographic concentration, investment style, capitalization of underlying investments, as well as the maturity, credit quality, and geographic exposure to income funds. While all investments involve some risk, including loss of capital and purchasing power, WisCap diversifies not only asset classes and sectors, but philosophies and strategies as well, to broaden participation in advancing markets and reduce portfolio volatility.

WisCap uses investment strategies when managing client assets and/or providing investment advice that are subject to the following associated risks:

Mutual Funds and ETFs. Investments in ETFs are subject to different risks than investments in mutual funds, as some ETFs do not issue and redeem shares on a continuous basis, potentially making such ETFs less liquid than open-end mutual funds. Depending on the mutual fund or ETF, underlying investments that hold specialty or hybrid investment vehicles, and/or derivatives, may be more volatile and less liquid than other investments, and may employ leverage that can magnify the vehicles' gains and losses. Where mutual funds or ETFs are designed to obtain investment results corresponding generally to the price and yield performance of a particular index, their returns may not match those they aim to replicate.

Fixed Income Risk. Changes in interest rates will significantly affect a fixed income security's market value – typically, when interest rates rise, a fixed income security's market value declines, and vice versa. Generally, a fixed income security with a longer maturity will entail greater interest-rate risk but have a higher yield. Conversely, a fixed income security with a shorter maturity will entail less interest rate risk but have a lower yield. The market value of a

fixed income security may also be affected by credit risk due to changes in its credit quality rating or the issuer's financial condition.

REITs. Equity REITs invest directly in real property while mortgage REITs invest in mortgages on real property. REITs may be subject to certain risks associated with the direct ownership of real estate, including declines in the value of real estate, risks related to general and local economic conditions, overbuilding and increased competition, increases in property taxes and operating expenses, fluctuations in interest rates, and variations in rental income. In addition, the failure of a REIT to qualify as such for tax purposes would have an adverse impact on the value of the participating fund's investment in that REIT. Some REITs have relatively small market capitalizations, which could increase their market volatility. REITs tend to be dependent on specialized management skills, and may have limited diversification, causing them to be subject to risks inherent in operating and financing a limited number of properties.

Market Risk. The market value of a security may decline due to general market conditions that are not specifically related to a particular company, or because of factors that affect general economic conditions of the market as a whole.

Individual Security Selection Risk. Securities selected as portfolio investments for clients may decline due to events unique to the individual security. Such events include, but are not limited to, changes in a company's business or credit outlook, its geographic exposure, events at competitor companies, and changes in government policy or regulatory environment.

Sector Risk. Sector risk is the possibility that securities within the same industry will decline in price due to sector-specific market or economic developments. Government regulation or technological changes often influence specific industry characteristics and profitability. Although WisCap seeks to invest in a diversified portfolio of securities, the firm may find numerous attractive investments within a particular industry sector. In such cases, WisCap may overweight a particular sector, relative to the weightings in the S&P 500 Index. Such overweighting exposes the portfolios to risks specific to that industry that may not correlate with the overall market.

Foreign Securities. Although WisCap invests primarily in securities priced in U.S. dollars and traded on U.S. exchanges or issued by U.S. mutual fund companies, it may from time to time invest in foreign securities. To the extent WisCap invests in foreign securities, such investments will be subject to special risks, including exposure to currency fluctuations, less liquidity, less developed or less efficient trading markets, lack of comprehensive company information, political instability, and differing auditing and legal standards.

Credit Risk. The value of a client's investments in fixed income securities is dependent upon WisCap's analysis of a number of factors, including the underlying credit worthiness of the issuer. A reduction in the credit worthiness of the fixed income instrument's issuer or negative perception of the issuer's ability to pay may reduce the price of the security, resulting in a greater risk of principal loss. An issuer bankruptcy may result in a total loss of principal.

Key Man Risk. Thomas G. Plumb, WisCap's owner, President and Portfolio Manager is the firm's sole portfolio manager and the firm does not have any other fully dedicated staff. This presents the risk that WisCap may not be able to continue to service clients in the event that Mr. Plumb is unable to perform his responsibilities.

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 a client's evaluation of WisCap or the integrity of WisCap's management. WisCap has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

WisCap is owned by TGP, Inc. and TGP, Inc. in turn is owned by Thomas G. Plumb. TGP, Inc. also maintains ownership interest in an affiliated entity, SVAPF. SVAPF is owned by TGP, Inc. and Diversified Services of Wisconsin, Inc., which is owned by numerous partners of SVA Certified Public Accountants, S.C. ("SVA CPA") an affiliated subsidiary.

WisCap has a number of other affiliates, including:

- SVA Certified Public Accountants, S.C.
- SVA Consulting, LLC
- SVA Financial Services, LLC
- SVA Technology Services, LLC
- SVA Staffing Solutions, LLC
- SVA Plumb Trust Company, LLC
- SVA Plumb Wealth Management, LLC

Based on its good faith judgment of a client's specific needs, WisCap may recommend that such client utilize an affiliate's services. Unless otherwise disclosed to the client, services provided by an affiliate are separate and distinct from the investment advisory services provided by WisCap. WisCap has a conflict of interest when recommending an affiliate's services for its clients, because the affiliate's services will generate revenue for the affiliated subsidiary, which will indirectly benefit WisCap.

Clients should be aware that when the accounting services of SVA CPA or trust services of SVA Plumb Trust Company, LLC (the "Trust Company") are recommended, WisCap and other individuals associated with WisCap do not evaluate similar accounting, trust, or other services which may be available to the client from other providers, nor does WisCap supervise, evaluate, or monitor those services on behalf of the client.

To the extent that accounting or trust services are provided by affiliates, WisCap will communicate financial or other information about the client directly to those affiliates to the extent that such information is available to WisCap. The affiliated service providers may also contact the client directly to obtain initial and follow-up information from the client. There is no restriction on the ability of any client to contact or consult with affiliates performing accounting or trustee services.

Clients may be able to obtain comparable services from unaffiliated individuals and organizations at fees which may be higher or lower than the fees charged by WisCap's affiliate. No client is obligated to utilize WisCap's affiliates for any other services, and clients can terminate their services with the affiliate at any time in accordance with their service agreement. Termination of the use of a WisCap affiliated provider will not, as a matter of practice, have an impact on the level of service WisCap provides its clients.

As noted above, WisCap is affiliated with SVAP WM; SVAP WM is an investment adviser owned by SVAPF. SVAP WM provides discretionary and non-discretionary investment management services to its clients, as well as a broad range of financial planning, retirement plan and consulting services. Certain of WisCap's employees, including its President, are also employees of SVAP WM. This presents a conflict of interest due to competing priorities.

WisCap has policies and procedures, including a Code of Ethics, to address this potential conflict of interest. Please see Item 11 for an overview of WisCap's Code of Ethics.

WisCap is the investment adviser to the Plumb Funds. WisCap may invest some or all of its clients' accounts in the Plumb Funds. Because WisCap earns investment advisory fees for its services to the Plumb Funds based upon the value of the funds it manages, a conflict of interest exists when WisCap effects such purchases for client accounts. WisCap does not charge clients directly any investment advisory fees for that portion of an account invested in the Plumb Funds. WisCap has an incentive to recommend the Plumb Funds for its client accounts in order to grow the Plumb Funds. WisCap recommends Plumb Funds to clients when it determines the investment is appropriate for the client's account.

Clients and prospective clients are encouraged to carefully consider the affiliations and conflicts of interest described above. Questions regarding the service of affiliates, the relationship between affiliates and the revenues earned may be directed to WisCap by calling (608) 960-4616.

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

WisCap has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty owed to its clients. The Code of Ethics includes provisions for maintaining confidentiality of client information, a prohibition on insider trading, restrictions on providing and accepting gifts and business entertainment, and personal securities trading procedures, among other things. All supervised persons of WisCap acknowledge the terms of WisCap's Code of Ethics annually, or as amended. Deleted.

WisCap's Code of Ethics governs personal securities trading activity. Access persons are permitted to buy and sell securities that WisCap also recommends to clients. T

The Code of Ethics is designed to provide reasonable assurance that the personal securities transactions, and the activities and interests of the access persons of WisCap will not interfere with making decisions in the best interest of advisory clients and implementing such decisions. Under the Code of Ethics, 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 WisCap's clients. In addition, the Code of Ethics requires pre-clearance of many transactions, and restricts or prohibits trading in close proximity to client trading activity.

Nonetheless, because the Code of Ethics in some circumstances would permit access persons to invest in the same securities as clients, there is a possibility that access persons might benefit from market activity by a client in a security held by an access person.

Personal trading is monitored by WisCap to address the conflicts arising from allowing its access persons to invest in the same securities as clients.

WisCap may recommend to client and invest some or all of clients' accounts in the Plumb Funds. Because WisCap earns investment advisory fees for its services to the Plumb Funds based upon the value of the funds it manages, a conflict of interest exists when WisCap makes such purchases for client accounts. Refer to Item 10 for further details on conflicts arising related to the Plumb Funds and how they are addressed.

WisCap access persons are permitted to invest in the Plumb Funds. This may create an incentive for WisCap to put the interests of these affiliated mutual funds ahead of other clients. However, the Code requires WisCap to place clients' interests ahead of their own and to report personal transactions and holdings in mutual funds managed by WisCap in accordance with the reporting requirements described above.

WisCap's President is also an employee of SVAP WM and makes investment decisions for clients of both advisers. This creates a conflict of interest as he may have incentive to favor client(s) of one adviser over clients of the other. However, WisCap's president is subject to each adviser's Code of Ethics, both of which require the interest of clients to be placed ahead of all other interests, and maintain trading and investment management policies and procedures, which are designed to provide reasonable assurance that all clients are treated fairly over time. Please see Item 12 for an overview of WisCap's trade aggregation and allocation practices.

WisCap's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting WisCap at 608-960-4616.

Item 12 – Brokerage Practices

The primary consideration in WisCap's selection of brokers and dealers is prompt and efficient execution of orders so that WisCap clients' total cost in each transaction is the most favorable and equitable under the circumstances.

WisCap selects the broker-dealer to be used with the objective of negotiating a combination of the most favorable commission, and the best price obtainable given the market conditions and the nature of the specific account. The specific factors considered in selecting a broker-dealer to effect client transactions include: WisCap's knowledge of commission structure; broker-dealer knowledge of and dominance in specific markets, securities, and industries including investment idea generation; quality of execution including best price under the circumstances; the broker-dealer's ability to locate liquidity; the overall relationship of the broker-dealer with WisCap, including responsiveness and dependability; whether or not the broker-dealer has acceptable record keeping, administrative and settlement functions; financial condition of the broker-dealer; their inventory of fixed income securities; price(s) of available securities; the broker-dealer's reputation and integrity; and research services provided by the broker-dealer (as described in further detail below).

When placing orders for securities traded in a negotiated market, particularly government bonds and over-the-counter stocks, WisCap may use the services of a broker ("introducing broker") rather than the primary dealers ("market makers") in the specific security. These introducing brokers process transaction orders from WisCap by buying or selling securities through market makers in the securities. The introducing brokerage firms receive a commission. Although WisCap has the ability to go directly to market makers for transaction executions and avoid the introducing broker-dealers' commission, WisCap sometimes finds that use of introducing brokerage firms, particularly the broker associated with the client's account, is a convenient means to obtain efficient executions for client accounts. It is generally WisCap's practice not to place orders directly with a market maker when the size of the order is small, when clients have directed WisCap to use a particular broker-dealer, or when WisCap believes security delivery delays could occur by use of a particular market maker brokerage firm. Use of brokerage firms other than the market maker may not result in best price to clients on a trade-by-trade basis.

WisCap may recommend that clients establish brokerage accounts with Schwab Advisor Services (formerly called Schwab Institutional) division of Charles Schwab & Co., Inc. ("Schwab"), a registered broker-dealer to maintain custody of clients' assets and to effect trades for their accounts. WisCap is not affiliated with Schwab. Schwab provides WisCap with access to its institutional trading and custody services which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, and are not otherwise contingent upon Advisor committing to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, 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 WisCap's client accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available other products and services that benefit WisCap but may not specifically benefit its clients' accounts. Some of these other products and services assist WisCap in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of WisCap's fees from its clients' accounts; and assist with back-office functions, recordkeeping, and client reporting. Many of these services generally may be used to service all or a substantial number of WisCap's accounts, including accounts not maintained at Schwab.

Schwab also makes available to WisCap other services intended to help WisCap manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

In addition, Schwab may make available, arrange and/or pay for these types of services rendered to WisCap by independent third parties. Schwab 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 WisCap. WisCap endeavors to act in its clients' best interests. WisCap's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to WisCap of the availability of some of the foregoing products and services and not solely on the nature, cost, or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest. While WisCap encourages clients to consider the use of Schwab's services as we are able to manage an account at Schwab in an efficient manner, the decision of which custodian to choose rests with the client.

Soft Dollar Practices

WisCap also considers the value of proprietary and third-party research services received in return for the client brokerage WisCap directs to various broker-dealers. This research is used by WisCap to manage its clients' accounts. WisCap may pay brokerage commissions ("soft dollars") in excess of the commissions another broker-dealer or trading platform may have charged for executing similar transactions without providing such research. Some of these research products and services might otherwise be available to WisCap for a cash payment.

When WisCap receives research or other services as a result of commissions paid by clients, it receives a benefit because it does not have to produce or pay for the research or services. Research services provided by broker-dealers may be used in servicing any or all WisCap clients and such research products or services may not necessarily be used by WisCap in connection with the accounts that paid commissions to the broker-dealer providing the products or services. WisCap does not seek to allocate soft dollar benefits to client accounts proportionately to the soft dollar credits the accounts generate.

WisCap evaluates the price and quality of execution of WisCap trades, including the value of research products and services obtained by WisCap with client brokerage commissions.

Research obtained includes sell side research (including access to broker-dealers' research analysts), access to company management, invitations to investment conferences, electronic research services, best execution evaluation services, and market data services. WisCap has an incentive to continue to use selected research broker-dealers to execute transactions so WisCap may continue to receive research products and services.

WisCap's president is also an employee of SVAP WM, an affiliated investment adviser. While soft dollar research services are not shared between the advisers (one adviser's soft dollar commissions are not used to generate research for use by the other adviser), Wiscap's president may gain knowledge from one adviser's soft dollar research products that can be useful in their role with the other firm. To address this potential conflict of interest, WisCap and SVAP WM maintain separate soft dollar commission budgets, select soft dollar benefits independently based on each firm's needs (including acquiring a service twice if needed for both advisers) and monitor their soft dollar arrangements separately.

WisCap may have an incentive to select or recommend a broker-dealer based on potential interest in receiving research, or other products or services, rather than its client's interest in receiving most favorable execution. To mitigate WisCap's soft dollar conflicts, WisCap maintains policies and procedures designed to ensure it selects brokers based on its fiduciary obligations, and not based on this conflict. WisCap also routinely reviews allocation of commissions to brokers and soft dollar matters including evaluating whether the value of soft dollar services received are reasonably equitable to the commissions paid.

Client Directed Brokerage

Clients may direct us to use a specific broker-dealer to effect transactions in their accounts ("Directed Accounts"). Directed Accounts are by their nature subordinate in the trade rotation to those accounts where WisCap has full discretion to choose the broker-dealer to be used for execution of trades because Directed Accounts: (i) must have their trades directed to brokers and trading desks by phone or web portal; (ii) generate benefits from commissions that accrue primarily to the particular Directed Account(s) and not to clients generally; and (iii) do not generate commissions which provide substantial research to support WisCap's investment research process. Further detail related to client account trade rotation is included below.

WisCap strives to get prompt and efficient execution of orders for clients who direct WisCap to execute securities transactions through a particular broker-dealer, including "wrap fee" arrangements. However, by directing brokerage to a specific broker-dealer, the client is essentially waiving WisCap's duty to obtain best execution because it limits WisCap's ability to block the client's orders with those of other clients to receive an average price for securities bought or sold or otherwise obtain best price and execution. When a client elects to direct its brokerage, the client may incur transaction costs and commissions that are higher, particularly if the client selects a full-service broker rather than a discount broker. The costs and commissions of a full-service brokerage account may be higher than other available brokerage arrangements, even after the brokerage firm's rates have been discounted.

Aggregation and Allocation of Trade Orders

In order to provide for the fair treatment of all clients, WisCap strives to allocate investment opportunities among clients in a fair and equitable manner based on the characteristics and needs of the clients and market conditions.

WisCap's president is an also employee of SVAP WM, and make investment decisions for clients of both advisers. This creates a conflict of interest for WisCap's president, as he may have incentive to favor client(s) of one adviser over clients of the other. To mitigate this conflict, his is subject to each adviser's Code of Ethics, which require the interests of clients to be placed ahead of all other interests, and contain trading and investment management policies and procedures, which are designed to provide reasonable assurance that all clients are treated fairly over time.

WisCap may, when appropriate, aggregate trades among clients, often referred to as "block" trading, in an effort to obtain best execution and the best security price available. Should a trade involve various client types, WisCap will rotate the order in which the trades are made. When a block order is filled (full or partial fill), WisCap will calculate an average execution price for all trades in a block in a single day so that all participants receive the average price.

In the event of a partial fill equity trade, WisCap allocates shares to accounts included in the trade on a pro-rata basis.

When trading fixed income securities in block orders, shares will be allocated to clients participating in the block, when there is enough volume. In the case where there is not enough volume, WisCap allocates fixed income securities to accounts based on need; specifically, those accounts with excess cash and those accounts whose current investment allocation is out of line with the account's desired strategy.

WisCap may apply common sense deviations to its standard allocation process, including the following circumstances:

1. Pro-rata allocation results in a de minimis number of shares;
2. An account is charged per trade transaction fees by its custodian, creating undue costs by executing trades over several days;
3. Extreme market volatility;
4. Cash limitations or excess cash;
5. Client specific investment restrictions;
6. Client's tax status;
7. Client direction or requirement to raise cash in the account; and
8. Common sense and equitable adjustments.

Cross Transactions

Although infrequent, WisCap may effect a purchase and sale transaction between two client accounts (a "cross" trade) where it determines a cross trade is in the best interest of each participating client and no client is deemed to be disadvantaged by the transaction. If a

broker-dealer is used to facilitate settlement, the client may incur a customary, nominal fee to be paid to the broker-dealer.

WisCap applies an independent market price in each cross transaction, and does not receive any fee or other compensation, other than their advisory fees, for effecting a cross transaction.

Trade Error Correction

As part of its internal policies and procedures, WisCap maintains a Trade Error Correction Policy to address trade errors that may occur in a client account. WisCap considers a trade error to be an unintentional mistake, such as purchasing instead of selling a security, purchasing (or selling) an incorrect amount of a security, or purchasing (or selling) a security contrary to an applicable client guideline. WisCap strives to correct all trade errors within a reasonable period of time following discovery of the error by reversing the original action that caused the error. WisCap shall not use commissions from other client accounts to correct trade errors.

It is WisCap's policy for clients to be made whole following a trade error. WisCap will pay as appropriate to make the client account whole, unless the executing broker's policy is to absorb de minimis (e.g., under \$100) losses. To the extent an executing broker independently determines to absorb a de minimis loss arising from a trade error caused by WisCap, the broker will not be compensated for the loss with brokerage business.

If the trade error results in a gain, the investment gain will remain in the client's account so the client may keep that gain, unless: (1) it is not permissible for the client to retain the gain; (2) upon conferring with the client, the client decides to forgo the gain; or (3) the executing broker's policy is to retain de minimis (e.g., under \$100) gains.

Addressing trade errors presents a true conflict to all advisers, including WisCap, as advisers have a financial incentive to minimize a trade error resulting in a loss and to maximize a trade error resulting in a gain. To mitigate this conflict, WisCap maintains policies and procedures designed to provide reasonable assurance trade errors are properly addressed.

Item 13 – Review of Accounts

It is important that you discuss any changes in your financial objectives, circumstances, or risk profile with WisCap.

WisCap is responsible for periodic reviews of your accounts, including holdings to determine that recommended transactions continue to be suitable based on general guidelines set up at the inception of the adviser-client relationship; written agreements; correspondence; or changes in life circumstances. Reviews are also performed at the client's request, when changes in the market or economic trends warrant it, after a client communicates a change in objective, and/or at the discretion of the Portfolio Manager.

WisCap conducts reviews of client account objectives, asset class exposures, and risk tolerance parameters on a continuous basis. Final decisions regarding investments in each account are left to the judgment of WisCap.

Unless otherwise requested by the client, WisCap provides reports at least quarterly showing the securities held, current market value of the securities and detail describing the performance of the account.

Item 14 – Client Referrals and Other Compensation

WisCap receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers that have clients' accounts maintained at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12, Brokerage Practices. The availability to WisCap of Schwab's products and services is not based on WisCap giving particular investment advice, such as buying particular securities for WisCap clients.

Item 15 – Custody

WisCap maintains custody over client funds or securities to the extent advisory fees are deducted from a client's account. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. WisCap encourages clients to review WisCap statements carefully.

Client account information contained within these statements is derived from sources WisCap deems to be accurate, but WisCap cannot guarantee its accuracy as statements provided by the clients' custodian represent the true record of account holdings and activity. Performance information contained within WisCap statements is presented net of WisCap management fees, and past performance shown is not indicative of future results. WisCap encourages clients to compare information contained in our reports to reports provided by clients' custodians. Further, WisCap clients should not rely on information contained within WisCap's statements for tax or legal purposes; rather, WisCap recommends clients rely upon information provided by their custodian for these purposes. Clients are encouraged to contact WisCap with any questions regarding their account statements.

Item 16 – Investment Discretion

Clients generally provide discretionary authority to WisCap via the investment management agreement to select the identity, amount of securities to be bought or sold, and determine when securities should 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, WisCap observes the investment policies, limitations and restrictions of the clients for which it advises, which may limit WisCap's investment discretion. An example is where the client directs transactions to be effected through a specific broker-dealer which may limit WisCap's ability to obtain best execution. For

registered investment companies managed by WisCap, WisCap's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Item 17 – Voting Client Securities

The following information summarizes WisCap's Policy and Procedures regarding proxy voting when providing advisory services to its clients. Clients are responsible for instructing their custodian to forward client copies of all proxy and shareholder communications relating to the client's investment assets 1) to WisCap if the client elects WisCap to vote proxies on their behalf, or 2) to the client, if the client wishes to retain proxy voting authority. WisCap may offer assistance as to proxy matters upon a client's request.

Proxy Voting

In instances where the client authorizes WisCap to vote its proxies, WisCap strives to vote all proxies in the best economic interests of its clients, including the Plumb Funds. The Policies and Procedures do not apply to those situations where the client has retained voting discretion. WisCap shall vote proxies for clients pursuant to the authority granted in the investment management agreement between WisCap and its client, or as granted by written direction from each client. WisCap is responsible for ensuring that proxies are voted in accordance with WisCap's policies.

In general, proxies will be voted in a manner designed to maximize the value of client and Fund investments. In evaluating a particular proxy proposal, WisCap takes into consideration, among other things, management's assertions regarding the proxy proposal, WisCap's determination of how the proxy proposal will impact its clients and the Funds, and WisCap's determination of whether the proxy proposal will create dilution for shareholders.

Generally, it is WisCap's policy to vote in support of management's recommendations on proxy issues related to business operations matters, since management's ability is a key factor WisCap considers in selecting equity securities for client portfolios. WisCap believes a company's management should generally have the latitude to make decisions related to the company's business operations. However, when WisCap believes the company's management is acting in an inconsistent manner with its clients' best interests, WisCap will vote against management's recommendations.

WisCap has a duty to recognize a material conflict and to resolve the conflict before voting the proxy. For purposes of proxy voting, material conflicts of interest are defined as those conflicts that, in the opinion of WisCap, a reasonable investor would view as important in making a decision as to how to vote a proxy. Upon identification of a material conflict of interest relating to a specific proxy vote, WisCap will take one of the following actions to ensure the proxy voting decision is based on the clients' and/or Funds' best interests and is not a result of the conflict:

1. Engage an independent party to determine how to vote the proxy;
2. Prepare a report that (i) describes the conflict of interest; (ii) discusses procedures used to address such conflict of interest; (iii) discloses any contacts

- from outside parties (other than routine communications from proxy solicitors) regarding the proposal; and (iv) confirms the recommendation was made solely on the investment merits and without regard to any other consideration;
3. Refer the proxy to a client or to a representative of the client for voting purposes;
 4. Disclose the conflict to the affected clients or Funds and seek consent to vote the proxy prior to casting the vote; or
 5. Vote in accordance with pre-determined voting policy, as disclosed to clients and the Funds.

Clients may obtain a copy of WisCap's complete proxy voting policies and procedures upon request. Clients may also obtain information from WisCap regarding how it voted proxies on behalf of their account(s) by calling (608) 960-4616.

Item 18 – Financial Information

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

Exhibit A – Privacy Notice

Our Promise to You

As a client of WisCap, you share both personal and financial information with us. Your privacy is important to us, and we are dedicated to safeguarding your personal and financial information.

Information Provided by Clients

In the normal course of doing business and depending on the product or service you have with us, we may obtain non-public personal information about you. This information can include:

- Name, address, social security number, and date of birth;
- Information regarding securities transactions effected by us;
- Financial information such as net-worth, assets, income, bank account information, personal income tax information, and account balances;
- Information we receive from custodians with respect to your account(s); and
- Information received from service bureaus or other third parties.

How We Manage and Protect Your Personal Information

WisCap shares personal information for our everyday business purposes, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus. Also, we may share information with outside companies that perform administrative duties for us. However, our arrangements with these service providers require them to treat your information as confidential. Personal information, such as information about your transactions and experiences, is also shared with our affiliates¹ for everyday business purposes. WisCap does not share your personal information about your creditworthiness with our affiliates.

WisCap believes that our ability to provide information about services offered by us and our affiliates enables us to more effectively serve our customers. Therefore, with your prior authorization, WisCap may send you marketing materials about us or any WisCap affiliate. WisCap does not share your personal information for non-affiliates to market to you.

In order to protect your personal information, we maintain physical, electronic, and procedural safeguards to protect your personal information.

Client Notifications

We annually provide a notice describing our Privacy Policy. In addition, we will inform you and provide a revised notice if there are changes to our policy. Please do not hesitate to contact us with questions about this notice.

¹For the purpose of this privacy notice, affiliates of WisCap are SVA Plumb Financial, LLC; SVA Plumb Trust Company, LLC (South Dakota), SVA Plumb Wealth Management, LLC, SVA Financial Services, LLC and SVA Certified Public Accountants, S.C. and its related entities: SVA Consulting, LLC; SVA Technology Services, LLC; and SVA Staffing Solutions, LLC.