

**Form ADV Part 2A
Investment Adviser Brochure
March 19, 2018**



John A. Wolfe & Associates, Inc.

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This brochure provides information about the qualifications and business practices of John A. Wolfe & Associates, Inc. The information in this brochure has not been approved or verified by the U.S. Securities and Exchange Commission (SEC), or by any state securities authority. If you have any questions about the contents of this brochure, please contact us at 269-324-1988 or 800-344-6341. Additional information about John A. Wolfe & Associates, Inc. is available at the SEC's website at www.adviserinfo.sec.gov. Registration with the Securities and Exchange Commission does not imply a certain level of skill or training.

John A. Wolfe & Associates, Inc.

Investment Advisor Brochure: Summary of Material Changes

Registered Investment Advisers are required to amend their Form ADV 2 Brochures promptly throughout the year with material changes and no less than once per year within 90 days of the Adviser's fiscal year end.

John Wolfe & Associates, Inc., (JAWA) amended its Form ADV 2A on March 19, 2018 to report its 2017 fiscal year end assets under management. JAWA managed \$461,308,579 in 1461 limited discretionary accounts as of the close of business on December 31, 2017. JAWA's previously reported non-discretionary managed assets have been transitioned to assets under advisement.

JAWA also updated the Custody section of this Brochure. As part of the Adviser's efforts to provide premium service and convenience to clients, JAWA was granted standing letters of authorization (SLOAs) to assist certain of its clients with the movement of funds in and out of their accounts. As result, JAWA is deemed to have JAWA, Inc. of these investment accounts. As of December 31, 2017, these services involved 51 clients with accounts totaling \$16,017,819. JAWA complies with the safe harbor provisions in the SEC's No-Action Letter dated February 21, 2017 (Investment Adviser Association).

Please contact our office to obtain a copy of our updated Investment Adviser Brochure.

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John A. Wolfe & Associates, Inc.

Investment Adviser Brochure

Advisory Business

John A. Wolfe & Associates, Inc. (JAWA, Inc.) is an investment advisory service registered with the Securities Exchange Commission. The Company was founded in December, 1989, to provide discretionary investment management services. John A. Wolfe is the President and sole shareholder.

John A. Wolfe & Associates, Inc. advises about all types of investments. However, its discretionary investment management philosophy is conservative and its investment decisions are based upon principles that have proven successful in the long term. These principles are well known, having research and historical data that support the Company's disciplined methodology of investment management. JAWA, Inc.'s investment philosophy, its strategies, and how they are structured for the client's benefit are discussed more fully in the section, "Methods of Analysis, Investment Strategies and Risk of Loss", below.

Within the framework of the Company's investment philosophy, portfolios are managed on an individual basis, keeping foremost each client's specific financial circumstances. Prospective clients discuss with the adviser their financial situation, goals, risk tolerance and investment experience. Clients share additional information in completing an Account Suitability Profile. The discussion and the suitability form provide the information on which a plan is made for each client's circumstances. As a client's financial situation and goals change over time, the adviser's portfolio management adapts to address these changes. Clients are encouraged to contact or meet with the adviser whenever they have questions, and are frequently reminded to keep the adviser aware of their current situations. Clients may specify instructions and/or limitations for the management of their portfolio as a term of their client service agreement.

JAWA managed \$461,308,579 in 1461 limited discretionary accounts as of the close of business on December 31, 2017. JAWA's previously reported non-discretionary managed assets have been transitioned to assets under advisement.

Fees and Compensation

John A. Wolfe & Associates, Inc. is a fee only investment advisory; its only revenues are the fees paid by clients. The Company and its staff do not receive monetary compensation from investment companies (mutual funds), broker/dealers, custodians or any other parties or services. JAWA, Inc. and its employees do not sell securities, receive commissions or performance based compensation.

JAWA, Inc.'s annual fee rates range from a maximum of .75% to less than .25% of the value of the assets under discretionary management. The Company reserves the right to negotiate its management fee rate with each client.

Fees paid to JAWA, Inc. are separate and distinct from the fees and expenses charged to shareholders of mutual funds. These fees and expenses are described in each fund's prospectus, and generally include management fees and other fund expenses, or possible distribution fees or sales charges.

Fees are billed in arrears in May, September and January for the four prior months. For partial months, a daily fee is calculated by multiplying the billable assets daily valuation by $1/365^{\text{th}}$ of the annual fee rate. Each partial month's fee is the sum of that month's daily fee calculations. A full monthly fee is calculated by multiplying the month end billable asset valuation by the month's fee factor, which is $1/365^{\text{th}}$ of the annual fee rate times the month's number of days. Clients receive statements showing their monthly fees, their fee rates and their account monthly ending values and average monthly values. A report showing every detail of the fee calculation can be provided upon request. Clients pay fees through deductions from their account(s), with a few exceptions receiving direct billing.

Accounts are charged brokerage fees and trading costs by broker dealer and/or custodians. These expenses are paid from the client's account(s) separate from JAWA, Inc.'s compensation. Clients should review securities' prospectuses, service contracts and service fee disclosures to fully understand the total costs charged to their investments and investment accounts by mutual funds, brokerages, custodians and investment advisers. More information about brokerage expenses is within this brochure's section, "Brokerage Practices", below.

Performance-Based Fees & Side-By-Side Management

JAWA, Inc. does not charge performance-based fees.

Types of Clients

John A. Wolfe & Associates, Inc. provides advisory services to individuals and organizational clients. Individual portfolios include retirement, personal, custodial and trust accounts. Organizations' accounts include retirement plans, general investment and endowment accounts.

JAWA, Inc. suggests an opening portfolio balance of \$500,000. Lesser opening balance amounts are considered with the client's understanding that smaller accounts may not be as well diversified as larger portfolios.

Methods of Analysis, Investment Strategies and Risk of Loss

The goal of an investment is to earn a return for the investor; however, returns are earned through the investor's assumption of risk. All investors should be prepared to bear the risk that an investment could result in a negative outcome, including loss. The probability that an investment earns a positive return is greater when the investment horizon is long term, the strategies are supported by years of experience and research, and the investment expenses are low.

The Company's approach to investing is conservative. JAWA, Inc.'s criteria in making investment decisions begins with several evaluations of securities, and of what combination of investments meeting these criteria should build a portfolio that is suitable for the client's goals and risk tolerance. One evaluation is fundamental analysis, which judges securities by financial strength, financial performance, market/brand dominance, stability and management relative to their history and industry class. A fundamentally strong security carries less risk. Another criterion is how a security would increase the diversification of a portfolio. Diversifying is to invest in many different industries and geographical regions worldwide, and this works to decrease risk. Securities are selected also in view of their correlation with other securities in the portfolio. By decreasing correlation among the securities, a portfolio has a higher probability of earning a return in varying economic circumstances. Fundamental analysis, diversification and decreasing correlation are well known and widely used approaches to evaluating securities and managing portfolios.

The Company's Investment Policy Statement requires that discretionary investments are mutual funds, ETFs (electronic exchange traded funds), unit trusts, money market funds, certificates of deposit, and Treasury bonds. JAWA, Inc. selects mutual funds managers that share its conservative investment philosophy and evaluation criteria.

JAWA, Inc. closely watches the overall expense of investments. There are many fees and charges associated with investing. The Company prefers no load, or low load mutual funds, and lower management and transaction expenses. Custodial and trading costs are discussed below under the "Brokerage Practices" heading.

JAWA, Inc.'s discretionary management goal is to earn competitive returns while employing strategies that mitigate investment risks and decrease expense. Clients receive reports of their portfolios' performance every

four months in January, May and September. Investment returns may be presented by asset class. When an asset class return is compared with a benchmark, the index's investment composition is comparable with that of the asset class. All performance returns are reported net of fees.

Disciplinary Information

John A. Wolfe & Associates, Inc. and its employees have no disciplinary history.

Other Financial Industry Activities and Affiliations

John A. Wolfe & Associates, Inc. and its employees are engaged only in this Company's advisory business. The Company and its employees have no other industry activity or affiliation.

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading

JAWA, Inc.'s Code of Ethics describes the conduct expected of every employee, and it includes the Standards of Professional Conduct which specifies the duties and responsibilities that must be met to work at the Company. Copies of the Code of Ethics and Standards are provided to prospects and clients upon request.

JAWA, Inc., its employees and related persons may already own or to choose buy or sell securities in their personal accounts which are identical to securities owned by clients or recommended to existing and future clients. If a conflict of interest occurs, the Company's policy is that priority will always be given to the client's interest over the interest of the JAWA, Inc., its staff and related parties.

Brokerage Practices:

Research and Other Soft Dollar Benefits

JAWA, Inc. does not receive monetary compensation from any investment company, custodian or broker-dealer. However, the Company does benefit from access to technology and services offered by these companies.

The technology and services provided by broker-dealers, custodians and investment companies include software, access to servers and websites that provide real time client account data, proprietary and third party research, securities pricing and market data. Broker-dealers' services facilitate trade execution and support JAWA, Inc. with record keeping, client reporting, transfers to clients' accounts at other financial companies and facilitating payment of clients' fees.

Broker-dealers/custodians may assist JAWA, Inc.'s management with its client services' operations, evaluation, development and planning. They also provide investment research on their websites, in publications, continuing education programs and general conferences.

These services are provided without cost to the benefit of all clients by facilitating the Company's administration of accounts and increasing its investment knowledge.

Brokerage for Client Referrals

JAWA, Inc. receives no client referrals from any brokerage.

Directed Brokerage

Under the terms of the Company's Client Service Agreement, clients authorize the selection and designation of Charles Schwab & Co., Inc. Institutional Service Group as the custodian and broker-dealer for their accounts. JAWA, Inc. acknowledges that not all advisers direct clients' selection of a broker-dealer.

JAWA, Inc. considers many factors in considering broker/dealer/custodial services. These include the capability to execute, clear and settle trades; to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payments, etc.); breadth of available investment products; availability of investment research and tools; quality of services; reputation; financial strength; account protection and prior service to JAWA, Inc. and its clients. JAWA, Inc.'s experience with Charles Schwab & Co., Inc. in these capabilities has been excellent.

Schwab insures assets for limits above the Securities Investor Protection Corporation. Beyond the SIPS's limits of \$500,000.00 per client, which includes a maximum of \$250,000.00 coverage for cash, Schwab insures through Lloyd's of London customer accounts held in the same capacity up to \$150,000,000.00 of securities including up to \$1,150,000 in cash.

The Company recognizes that by directing clients' selection of a custodian, clients could be unable to achieve the most favorable execution and/or transaction costs. However, JAWA, Inc. is required by regulation to periodically compare the fees charged by Charles Schwab & Co., Inc. Institutional Service Group with those charged to clients of other comparable broker-dealers/custodians. In general, these comparisons indicate that Charles Schwab & Co., Inc. Institutional Service Group's fees (which include commission rates, margin interest rates, trading and transfer fees) are competitive. Charles Schwab & Co., Inc. Institutional Service Group does not charge for custody services.

The designation by clients of Charles Schwab & Company, Inc., Institutional Service Group for brokerage and custodial services does not make JAWA, Inc. an affiliate of Schwab. It does allow JAWA, Inc. to participate in the Schwab Institutional Service Group program, which is offered to independent investment advisers. JAWA, Inc. receives no monetary compensation from Schwab Institutional for this participation. However, clients benefit from Schwab's institutional rates for broker/dealer/custodian service fees that are lower than the fees charged by their retail investment service.

Participation in the Schwab Institutional Service Group program is not contingent upon JAWA, Inc. committing to Schwab any specific amount of business. In addition to the services described above, participation in the Schwab Institutional Service Group program allows JAWA, Inc.'s clients two significant advantages. One is access to institutional funds that are not available to retail clients, and the other is that many funds lower their initial investment minimum requirements.

Review of Accounts

Portfolio reviews are performed by the Chief Portfolio Manager and the Portfolio Manager. Every account's portfolio activity is downloaded daily from the custodian, posted and reconciled. Portfolios may be reviewed or analyzed based upon this daily information.

Reviews are made when there are material changes in clients' financial circumstances, service agreements, the securities' markets, political policies, the economy, account activity or investment performance. Reviews occur whenever a client or the adviser deems necessary.

Portfolios are regularly reviewed in preparation of the Company's reports to clients, which are sent three times a year. The reports include commentary addressing pertinent investment issues and economic information, account statements, presentations of performance and account activity and management fee statements. Other individualized correspondence within reports is included as requested by client or deemed informative by the adviser. Pertinent information from published sources may be included, when the author has given the Company reprint permission. Clients may also receive special reports when there are unusual economic events or circumstances.

Client Referrals and Other Compensation

JAWA, Inc. neither pays nor receives compensation or any other economic benefit for referrals.

Custody

All clients' assets are held by Charles Schwab & Co., Inc. Institutional Service Group, ("Charles Schwab & Co.") Member FINRA/SIPC, which is a qualified custodian. (SEC qualified custodians include banks, savings association, and registered broker/dealers, among a few other institutions.) Clients receive monthly account statements directly from the custodian and clients should carefully review them.

JAWA, Inc. only has access to clients' custodial accounts in order to: Facilitate trades via its discretionary authority and to withdraw the Adviser's contractually agreed investment management fees, with the client's written authorization. Execution and clearing services are provided by Charles Schwab & Co. In all cases, clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities.

As part of the Adviser's efforts to provide premium service and convenience to clients, JAWA was granted standing letters of authorization (SLOAs) to assist certain of its clients with the movement of funds in and out of their accounts. As result, JAWA is deemed to have JAWA, Inc. of these investment accounts. As of December 31, 2017, these services involved 51 clients with accounts totaling \$16,017,819. JAWA complies with the safe harbor provisions in the SEC's No-Action Letter dated February 21, 2017 (Investment Adviser Association).rest in a pool of securities.

Investment Discretion

JAWA, Inc. provides investment management and administration services. Before any investment management services are provided, prospective clients must share detailed information about their financial circumstances and goals, their understanding and tolerance of risk, their investment knowledge and experience. Prospective clients meet with an adviser and complete forms that document this information. All JAWA, Inc. clients are regularly reminded that this information changes over time, and that JAWA, Inc. needs to be kept abreast of clients' changes in their financial circumstances and goals.

Clients grant JAWA, Inc. discretionary authority in the terms of the Company's Client Service Agreement. This contract limits JAWA, Inc.'s discretionary authority to the purchase and sale of securities, and to debit clients' accounts for payment of management fees. The Agreement binds JAWA, Inc. to maintain clients' directed allocation of equity/fixed income within a 10% range. A client may choose to make individualized instruction for his/her account within the Client Service Agreement.

Voting Client Securities

John A. Wolfe & Associates, Inc. does not accept the authority to vote clients' securities. Clients receive proxies and shareholder reports from the Custodian, by mail or e-mail. Questions regarding the shareholder voting process or their proxies may be directed to our office.

Financial Information

John A. Wolfe & Associates, Inc. has no knowledge of any reasonably likely condition or situation that could impair its ability to fulfill its contractual commitments to clients.