

# BCU Wealth Advisors, LLC

Registered Investment Advisor

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

847-932-8007

[www.bcuwa.org](http://www.bcuwa.org)

Form ADV Part 2A

Firm Brochure

Financial Planning and Investment Consultation Services

October 29, 2018

This brochure provides information about the qualifications and business practices of BCU Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact our Chief Compliance Officer at 847-932-8007.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about BCU Wealth Advisors, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Click on the "Investment Adviser Search" link and then search for "Investment Adviser Firm" using the firm's IARD number, which is 164173.

While the firm and its associates may be registered within a state jurisdiction, registration in itself does not imply a certain level of skill or training on the part of the firm or its associated personnel.

**The investment advisory services offered and any investment vehicles employed are (i) not deposits or other obligations of, nor are they guaranteed by, Baxter Credit Union or its affiliates; (ii) are not insured by the National Credit Union Administration (NCUA), National Credit Union Share Insurance Fund (NCUSIF) or any other agency of the United States Government or by Baxter Credit Union or its affiliates; and (iii) are subject to investment risks, including the possible loss of principal. Further description with respect to investment strategies and their potential risks may be found in Item 8 of this brochure.**

**Item 2 - Material Changes**

There have been no material changes since the March 23, 2018 filing on the IARD system.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at 847-932-8007 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

### Item 3: Table of Contents

|  |    |
|--|----|
| Item 1 Cover Page.....   | 1  |
| Item 2 Summary of Material Changes .....   | 2  |
| Item 3 Table of Contents .....   | 3  |
| Item 4 Advisory Business .....   | 4  |
| Item 5 Fees and Compensation .....   | 8  |
| Item 6 Performance-Based Fees and Side-By-Side Management .....  | 9  |
| Item 7 Types of Clients .....  | 9  |
| Item 8 Methods of Analysis, Investment Strategies and Risk of Loss.....                                | 9  |
| 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<br>and Personal Trading ..... | 14 |
| Item 12 Brokerage Practices .....  | 14 |
| Item 13 Review of Accounts .....   | 15 |
| Item 14 Client Referrals and Other Compensation .....  | 16 |
| Item 15 Custody .....  | 17 |
| Item 16 Investment Discretion .....  | 17 |
| Item 17 Voting Client Securities .....   | 18 |
| Item 18 Financial Information .....  | 18 |
| Privacy Policy Statement .....   | 19 |
| Form ADV Part 2bs of Supervised Persons.....   | 21 |

#### *Important Information*

Throughout this document, BCU Wealth Advisors, LLC shall also be referred to as the “firm,” “our,” “we” or “us.” The client or prospective client may also be referred to as “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*, including legal entities and natural persons. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., Internet address, etc.).

#### **Item 4 - Advisory Business**

##### **Description of Our Advisory Firm**

BCU Wealth Advisors, LLC is an Illinois-based limited liability company formed in 2012. The firm is a wholly owned subsidiary of Baxter Credit Union. Advisory firm management and associated personnel remain operationally independent of credit union operations. Our advisory firm does not own or control another financial services entity. In addition, internal control assessments are periodically made to ensure such separation is consistently maintained.

Our firm had been previously registered as an investment advisor with the State of Illinois in 2012, prior to our present registration with the SEC beginning in 2015. Our firm may notice file or meet certain exemptions in other states in which we conduct advisory business. We are a fiduciary and are required to act in a client's best interest at all times.

##### **Description of Advisory Services Offered**

BCU Wealth Advisors, LLC provides a range of investment advisory solutions to its clients. For those interested solely in planning areas such as cash flow and budgeting, education funding, retirement planning, risk management and estate planning, as well as periodic investment advice, we provide our financial planning and investment consultation services. We also offer a wrap fee investment program to eligible clients who prefer incorporating financial planning and investment management into a wrapped (bundled) asset-based fee. Further information is described in a separate advisory brochure that is available upon request.

At the beginning of the relationship a complimentary interview is provided by a representative of our firm to determine the scope of services for your engagement. During or prior to your first meeting we will provide you with our current Form ADV Part 2A firm brochure that incorporates our privacy policy, and you will receive a Form ADV Part 2B brochure supplement about the investment advisor representative who will be assisting you. The firm will also ensure any material conflicts of interest are disclosed regarding our firm and its associates that could be reasonably expected to impair the rendering of unbiased and objective advice.

Should you wish to engage our firm, we must first enter into a client services agreement; thereafter, discussion and analysis will be conducted to determine your financial needs, goals, holdings, etc. Depending on the scope of the engagement, we may require current copies of the following documents early in the process:

- Statements reflecting current investments in retirement and non-retirement accounts
- Information on current retirement plans and benefits provided by your employer
- Current financial specifics including W-2s or 1099s
- Insurance policies
- Tax returns
- Mortgage information
- Wills, codicils and trusts
- Completed risk profile questionnaires or other forms provided by our firm

It is important that the information and financial statements you provide are accurate. We may, but are not obligated to, verify the information you have provided, which will then be used in the financial planning or investment advisory process.

##### ***Financial Planning and Investment Consultation Services***

Our services may be broad-based (sometimes coined "comprehensive planning" or "wealth

management”) or more narrowly focused as you desire. If several or all of the services described are provided together through a broad-based plan, the total time needed to complete these services may be less than the time it would take to complete each service separately because of the efficiency gained by combining more than one service.

#### *Cash Flow and Debt Management*

We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses. Advice may also be provided on which debts to pay off first and any income tax ramifications. We may recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.

#### *Risk Management*

Our services include an analysis of your exposure to major risks that could have an adverse impact on your financial picture, such as premature death, longevity, disability, property and casualty losses, or the need for long-term care. Advice is provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential costs of not purchasing insurance (self-insuring).

#### *Employee Benefits*

We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible in your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.

#### *Retirement Planning*

Our retirement planning services typically include projections of your likelihood of achieving your financial goals, with financial independence usually the primary objective. For situations where projections show less than the desired results, we may make recommendations that include showing you the impact on those projections by making changes in certain variables (i.e., working longer, saving more, spending less, taking more risk with investments). If you are near retirement or already retired, advice may be given on appropriate income producing strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

#### *Tax Planning Strategies*

Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. We may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

#### *Education Planning*

Our education planning services may include projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and advice might also include the “pros-and-cons” of various college savings vehicles such as Section 529 college savings plans and any advantages to you (i.e., reduction of income taxes) of using a particular state’s Section 529 plan or prepaid savings plan or another plan (e.g., Coverdell Education Savings Accounts).

### *Estate Planning*

We may offer an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice may include ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes.

### *Investment Consultation*

Our investment consultation services may involve providing information on the types of investment vehicles available, employee stock options, investment analysis and strategies, asset allocation and portfolio design, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian (collectively, we term as “service providers”) of your choosing.

Where appropriate, we will prepare investment guidelines reflecting your investment objectives, time horizon, tolerance for risk, as well as any account constraints you may have for the portfolio. They will be designed to be specific enough to provide future guidance while allowing flexibility to work with changing market conditions.

The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure. Please note that we will not be managing your account(s) under this form of advisory engagement. Should you prefer that we do so, we may be engaged under our wrap fee investment program that is described in further detail within our Form ADV Part 2A - Appendix 1 (Wrap Fee Program Brochure).

### *Educational Workshops*

We may provide complimentary educational workshops on an “as announced” basis for groups desiring general advice on investments and personal finance. Topics may include issues related to financial planning, educational and estate planning, retirement strategies, and other economic or investment topics.

Our workshops are educational in nature and do not involve the sale of insurance or investment products. Information presented will not be based on any one attendee’s need nor do we provide individualized investment advice during an event’s general session.

### **Client-Tailored Services and Client-Imposed Restrictions**

#### ***Broad-Based v. Modular Financial Planning***

A broad-based plan is a detailed endeavor; therefore, certain variables can affect the cost involved in the development of the plan: the quality of your own records, complexity and number of current investments, diversity of insurance products and employee benefits you currently hold, size of the potential estate, special needs of the client or their dependents, among others. While certain broad-based financial plans may require 10 or more hours to complete; complex plans may require 20 hours or more to complete. Alternatively, and upon your request, we may concentrate on reviewing only a specific area (modular planning), such as educational funding, specific investment advice or a portfolio allocation, etc.

Note that when these services focus only on certain areas of your interest or need, however, your overall situation or needs may not be fully addressed due to limitations you may have established. Whether you have requested a broad-based or modular plan, we will present you with a summary of our recommendations, guide you in the implementation of some or all of them, and offer periodic reviews thereafter (see Item 13).

Unless your agreement with our firm involves an ongoing engagement, upon completion of your presentation or delivery of advice through this form of planning service, our services are typically concluded. You are always encouraged to contact our firm at any time in the future to re-engage our services.

### ***Periodic Review***

We strongly urge our clients to notify us of any change in their circumstances, and to schedule a review any time there is such a change. An annual review should be considered even if there is not a substantial change, because tax laws, estate laws, and insurance and investment products continually evolve.

In all instances involving our financial planning and investment consultation services, you will retain full discretion over all implementation decisions and are free to accept or reject any recommendation we make.

### **Wrap Fee Programs**

As previously noted, our firm offers a wrap fee investment management program to clients who maintain a minimum of \$50,000 of investible assets through our firm. This program incorporates all aspects of the investment management program through an asset-based fee, and also offers investors unified managed accounts (UMA), thereby allowing stocks, bonds and mutual funds to be managed within the same investment management platform by professional institutional investment managers. We ask that interested parties review our separate Form ADV Part 2A - Appendix 1 Wrap Fee Program Brochure for further details.

### **Client Assets Under Management**

As of December 31, 2017, our firm had approximately \$198 million of reportable client assets under management through discretionary account management agreements within our wrap fee investment program. We do not manage client accounts via our financial planning services engagements.

### ***General Information***

We do not provide legal or accounting services. With your consent, we may work with your other advisors (attorneys, accountant, etc.) to assist with coordination and implementation of accepted strategies. You should be aware that these other advisors will charge you separately for their services and these fees will be in addition to our advisory fees.

Our firm will use its best judgment and good faith effort in rendering its services. BCU Wealth Advisors, LLC cannot warrant or guarantee any particular level of account performance or that your account will be profitable over time. Past performance is not necessarily indicative of future results.

Except as may otherwise be provided by law, our firm will not be liable to the client, heirs, or assignees for any loss an account may suffer by reason of an investment decision made or other action taken or omitted in good faith by our firm with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; any loss arising from our

adherence to your direction or that of your legal agent; any act or failure to act by a service provider maintaining an account. Federal and state securities laws impose liabilities under certain circumstances on persons who act in good faith and, therefore, nothing contained in this document shall constitute a waiver of any rights that a client may have under federal and state securities laws.

## **Item 5 - Fees and Compensation**

### **Method of Compensation and Fee Schedule**

We provide our financial planning and investment consultation services on a fixed-fee basis, with fees typically ranging from \$1,000 to \$10,000 per project. The fee will take into consideration such factors as the estimated amount of time dedicated to the engagement, the complexity of your plan and your financial profile, and any special requests you may require. Typically, the financial plan is completed within six months. We reserve the right to assess a lower fee to BCU employees and immediate family members of BCU Wealth Advisors, LLC.

This fee may be waived if our firm manages assets for the client within a year of delivery of the financial plan. The services to be provided and their specific fees will be detailed in each engagement agreement. Our published fees may be discounted at the firm's discretion but they are not negotiable.

### **Advance Payment for Certain Services**

We may require an initial deposit of up to one half of your engagement fee for our financial planning and investment consultation services, which will be defined in your agreement.

### **Client Payment of Fees**

Fees may be paid by check or financial institution cashier's check. Cash, money orders or similar forms of payment are not accepted. Fees are generally due upon your receipt of our invoice.

### **Additional Client Fees**

Any custodial or transactional fees (sometimes termed *brokerage fees*) assessed by selected service providers, individual retirement account fees, or qualified retirement plan account termination fees will be borne by the account holder per the respective fee schedule of any selected service provider. Fees paid by our clients to our firm for our advisory services are also separate of any fee a client may pay for internal operating charges for mutual funds, as well as transaction fees of exchange-traded funds (ETFs), exchange-traded notes (ETNs) or other similar investments.

Further information about our fees in relationship to our operational practices are noted in Items 12 and 14 of this document.

### **External Compensation for the Sale of Securities to Clients**

We do not charge or receive a commission or mark-up on your securities transactions, nor will the firm and our associates be paid a commission on your purchase of a securities holding that we recommend.

Our advisory firm and its associates will not receive "trailer" or SEC Rule 12b-1 fees from an investment company we may recommend. Fees charged by issuers are detailed in prospectuses or product descriptions and you are encouraged to read these documents before investing. Our firm and its associates receive none of these described or similar fees or charges.

You will always have the option to purchase recommended investments through your preferred service provider.



### Termination of Services

Either party may terminate the engagement agreement at any time, which will typically be in writing. Should you verbally notify our firm of the termination and, if in two business days following this notification we have not received your notice in writing, we will make a written notice of the termination in our records and send you our own termination notice as a substitute.

If our Form ADV Part 2 brochure was not delivered to you at least 48 hours prior to entering into the investment advisory contract, then you will have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. Should you terminate an engagement after this date, you may be assessed fees for any time or charges incurred by our firm in the preparation of your plan. We will promptly return any unearned amount upon receipt of a written termination notice.

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

Our fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as “performance-based fees.” Our fees will not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it may pose, does not conform to our firm’s practices.

### Item 7 - Types of Clients

While our current client base tends to be individuals and high net worth individuals, we are available to provide our advisory services to charitable organizations and foundations, businesses of various scale, as well as their pension and profit sharing plans. Our firm does not require minimum income levels, minimum level of assets or other conditions for its financial planning and investment consultation services. We reserve the right to waive or reduce certain fees based on unique individual circumstances, special arrangements, or pre-existing relationships. We also reserve the right to decline services to any prospective client for any non-discriminatory reason.

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

#### ***Method of Analysis***

If we are engaged to provide investment advice, we will first gather and consider several factors, including your:

- current financial situation
- current and long-term needs
- investment goals and objectives
- level of investment knowledge
- tolerance for risk
- restrictions, if any, on the management of your portfolio

Our firm generally employs a fundamental analysis; evaluating economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. In addition to our own research, we may draw from other sources investment strategists whom we believe best serve our clients and their accounts.

We make asset allocation and investment decisions based on the above-noted elements and any other reasonable requirements you may prescribe. We will discuss with you how, in our best judgment, to meet your objectives while at the same time seeking a prudent level of risk exposure.

### ***Investment Strategies***

We recognize that each client's needs and goals are different therefore recommended investment strategies and underlying investment vehicles may vary.

#### ***Core + Satellite Strategy***

A Core + Satellite investment strategy blends passive based (or index) and active investing, where passive investments are used as the basis or "core" of a portfolio and actively-managed investments are added as "satellite" positions. With this strategy, the portfolio core holdings are indexed to potentially more efficient asset classes, while outlying selections are often limited to active holdings that are attempting to outperform a particular sector, or a selection of particular positions to increase core diversification, or to improve portfolio performance, or reduce risk during downward trends in the market and during times of uncertainty.

For example, the core of a portfolio may be built with passive based institutional mutual funds; satellite holdings would include actively managed mutual funds or separately managed accounts that have unique strategies that are believed capable of adding value beyond a stated benchmark over a full market cycle. The core may represent the majority of the total portfolio, using primarily index funds or index-based ETFs/ETNs. The remainder of the portfolio may then employ mutual funds or ETFs/ETNs that take a shorter duration to assist in the over-or-under allocation to specific sectors, regions, assets classes, etc.

#### ***Passive Investment Management***

Investment managers employing this strategy generally ascribe to and construct portfolios based on the principles of the Modern Portfolio Theory; a belief that proper diversification and risk management will provide an investor client with a more stable and consistent return over time. It has been statistically determined that a properly diversified portfolio, consisting of an appropriate weighting in different asset classes, will generally outperform most asset classes over time. The practice of Modern Portfolio Theory does not employ market timing nor stock selection methods of investing but rather a long term buy-and-hold strategy with periodic rebalancing of the account to maintain desired risk levels.

#### ***Active Asset Management***

A portfolio manager engaging in an active asset management strategy believes it is possible to create a profit from identifying or leveraging mispriced securities and producing returns greater than a stated benchmark, such as a well-known index. For example, a "large cap stock" fund manager might attempt to outperform the Standard & Poor's 500 Index by purchasing underpriced stocks or derivative instruments representing these positions.

### **Investment Strategy and Method of Analysis Material Risks**

#### ***Investment Strategy Risks***

We believe an investment strategy or recommendation should be designed to produce the appropriate potential return for the given level of risk; however, we cannot guarantee that an investment objective or planning goal will be achieved. Investing in securities involves the risk of loss that you should be prepared to bear, which may include some or all of your principal. The types of risk involved are noted in the following paragraphs, and in no order of precedence:

*Active Management Strategies* – Should your portfolio employ active management strategies, it may, at times, outperform or underperform various benchmarks or other strategies. In an effort to meet or surpass these benchmarks, active portfolio management may require more frequent trading or

“turnover” within an account. This may result in shorter holding periods, higher transactional costs and/or taxable events that will be borne by the client, thereby potentially reducing or negating certain benefits that may be derived by shorter term investing.

*Company Risk* – When investing in securities, there is always a certain level of company or industry specific risk that is inherent in each company or issuer. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry.

*Core + Satellite Strategies* – Strategies involving Core + Satellite investing may have the potential to be affected by “active risk” or “tracking error risk,” which might be defined as a deviation from the stated benchmark. Since the core portfolio attempts to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a “sample” or “optimized” index fund or ETF/ETN that may not as closely align the stated benchmark. In these instances, an investor may choose to reduce the weighting of a satellite holding, utilize very active satellites, or use a “replicate index” position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

*Firm Research* – When the firm’s research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, the firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. The firm makes an effort to determine the accuracy of the information received but it cannot predict the outcome of events or actions taken or not taken, or the validity of all information it has researched or provided, which may or may not affect the advice on or investment management of an account.

*Fundamental Analysis* – The challenge involved in using a fundamental analysis is that information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings, which may be the basis for a security’s value. If a security’s price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.

*Management Risk* – An investment with a firm varies with the success and failure of its investment strategies, research, analysis and determination of its portfolio. If an investment strategy were not to produce expected returns, the value of the investment would decrease.

*Market Risk* – When the stock market as a whole or an industry as a whole falls, it can cause the prices of individual stocks to fall indiscriminately. This is also called systemic or systematic risk.

*Passive Markets Theory* – If your portfolio employs a passive, efficient markets approach, often associated with Modern Portfolio Theory, you will need to consider the potential risk that at times your broader allocation may generate lower-than-expected returns than that from a specific asset, and that the return on each type of asset is a deviation from the average return for the asset class. The variance from the “expected return” is considered to generally be lower under normal market conditions if the portfolio is made up of diverse, low or non-correlated assets.

### ***Security-Specific Material Risks***

*ETF/ETN and Mutual Fund Risk* – ETFs/ETNs and mutual funds may carry additional expenses based on their share of operating expenses and certain brokerage fees, which may result in the potential

duplication of certain fees. The risk of owning an ETF, ETN or mutual fund also generally reflects the risks of their underlying securities.

*Fixed Income Risks* – Various forms of fixed income instruments, such as bonds, money market funds, bond funds, and certificates of deposit, may be affected by various forms of risk, including:

- *Credit Risk* - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as “default risk.” Credit risk may also occur when an issuer’s ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- *Duration Risk* - Duration is a measure of a bond’s volatility, expressed in years to be repaid by its internal cash flow (interest payments). Bonds with longer durations carry more risk and have higher price volatility than bonds with shorter durations.
- *Interest Rate Risk* - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.
- *Liquidity Risk* - The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading on any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.
- *Reinvestment Risk* – With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

*Index Investing* – ETFs/ETNs and indexed funds have the potential to be affected by “active risk” or “tracking error risk,” defined in the earlier paragraph with respect to Core + Satellite risks.

*QDI Ratios* – While many ETFs, ETNs and index mutual funds are known for their potential tax efficiency and higher “qualified dividend income” (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be part of an ETF/ETN or mutual fund portfolio), may be considered “non-qualified” under certain tax code provisions. We consider a holding’s QDI when tax efficiency is an important aspect of the client’s portfolio.

#### **Item 9 - Disciplinary Information**

Neither BCU Wealth Advisors, LLC nor its executive management have been subject to a reportable criminal, civil, industry disciplinary event or administrative enforcement action that would negatively reflect upon our firm’s advisory business or the integrity of our firm.

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

The firm’s internal policies require it and its personnel to conduct business activities in a manner that avoids or mitigates conflicts of interest between the firm, employees and its clients, or that may otherwise be contrary to law. We will provide disclosure to our clients prior to and throughout the term of an engagement of any conflicts of interest which will or may reasonably compromise its impartiality or independence.

**Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

BCU Wealth Advisors, LLC is not registered, nor does it have an application pending to register, as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm.

BCU Wealth Advisors, LLC is a wholly owned subsidiary of Baxter Credit Union, a state-chartered credit union. Baxter Credit Union also operates BCU Investment Advisors, a financial services department of the credit union, and a non-supervisory branch office of CUSO Financial Services, LP (“CFS”) of San Diego, CA. CFS is a FINRA-member broker/dealer and an SEC registered investment advisor. CFS is not legally affiliated with BCU Wealth Advisors, LLC. Certain members of the firm’s management as well as associated advisory representatives are registered with CFS, and this is described in detail within each associated person’s brochure supplement.

Associates may also serve in the capacity of licensed insurance agents offering annuities, life, health or long-term care insurance through various unaffiliated insurance companies or agencies. An associate may therefore serve a client in one or more capacities, whether as an investment advisor representative offering investment advisory services, registered representative offering brokerage services, or as a licensed insurance agent. Our associates are required to disclose, in advance of the transaction or service, the capacity in which they are serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur. At no time will there be *tying* between business practices and/or services; a condition where a client or prospective client would be required to accept one product or service which is conditional upon the selection of a second distinctive tied product or service.

Neither BCU Wealth Advisors, LLC, nor a member of our firm’s management, is or has a material relationship with any of the following types of entities:

- accountant or accounting firm
- lawyer or law firm
- pension consultant
- real estate broker, dealer or advisor
- sponsor or syndicator of limited partnerships
- trust company
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund).

Upon your request, you may be provided a referral to various professionals, such as an accountant or an attorney. While these referrals are based on our best information, we do not guarantee the quality or adequacy of the work provided by these referred professionals. We do not have an agreement with or receive fees from such professionals for these informal referrals, and any fees charged by these other entities for their services are separate from our advisory fee.

**Recommendation or Selection of Other Investment Advisors and Conflicts of Interest**

When appropriate we may provide a recommendation to a client to utilize our wrap fee investment program. The program involves the engagement of institutional investment managers (who are also required to be registered as investment advisors) to service a part of or the entire investment portfolio and in which both firms inevitably are paid a portion of an advisory fee. Please review our wrap fee investment program brochure for further details.

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

BCU Wealth Advisors, LLC believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate or minimize potential material conflicts of interest and to appropriately manage any material conflicts of interest that may remain. Clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest. Our firm will disclose to advisory clients any material conflict of interest relating to the firm, its representatives, or any of its employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

*Code of Ethics*

We have adopted a Code of Ethics that establishes policies for ethical conduct for all our personnel. Our firm accepts the obligation not only to comply with all applicable laws and regulations but also to act in an ethical and professionally responsible manner in all professional services and activities. Our policies include prohibitions against insider trading, circulation of industry rumors, and certain political contributions, among others. We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

*Firm Recommendations and Conflicts of Interest*

Neither our firm nor its associates are authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a “related person” (associates, their immediate family members, etc.) has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Our associates are prohibited from borrowing from or lending to a client unless the client is an approved lending institution.

Our firm is able to provide a broad range of services to its clients, including financial planning, investment consultation, and investment management services; we may be paid a fee for some or all of these services. Due to our firm and its associate’s ability to offer two or more of these services and possibly be compensated for each aspect of the engagement, a potential conflict of interest may exist. We therefore note that you are under no obligation to act on our recommendations and, if you elect to do so, you are under no obligation to complete them through our firm or our recommended service providers.

The firm does not trade for its own account (e.g., proprietary trading). Related persons of the firm may buy or sell securities similar to those recommended to clients for their accounts. The firm may also make recommendations or take action with respect to investments for its clients that may differ in nature or timing from recommendations made to or actions taken for other clients or its employees. At no time will the firm or any related party receive preferential treatment over its clients. In an effort to reduce or eliminate certain conflicts of interest involving personal trading (i.e., trading ahead of client’s order, etc.), firm policy may require the utilization of published lists that restrict or prohibit transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the Chief Compliance Officer in advance of the transaction in any related person’s account.

**Item 12 - Brokerage Practices**

BCU Wealth Advisors, LLC does not maintain physical custody of your assets nor do we serve as account

custodian (see Item 15). Your accounts and their holdings must be maintained in an account at a “qualified custodian” (generally a broker/dealer, trust company, etc.) that is frequently assessed for its capabilities to serve as a custodian by their respective industry regulatory authority.

When engaged to provide investment consultation services, we may recommend the service provider with whom your assets are currently maintained. Should you prefer a new service provider, our recommendation of another service provider would be based on your needs, overall cost, and ease of use. We periodically conduct an assessment of any service provider we recommend which generally includes a review of their range of services, reasonableness of fees, among other items, in comparison to their industry peers.

In light of the nature of our services under this form of advisory engagement, it is believed “best execution” review obligations with regard to client transactions are not required per current industry guidelines.

We do not require or engage in directed brokerage involving our client accounts. Under our financial planning and investment consultation agreement clients are free to use any particular service provider to execute their transactions and they are responsible for negotiating any terms or arrangements for their account. Our firm will not be obligated to conduct due diligence of the client’s selected service provider, seek better execution services or prices from any provider, or aggregate client transactions for trade execution.

Our firm will not be providing continuous investment supervisory services, nor will we have discretionary authority over an account, under this form of engagement. Aggregating (“blocking” or “batching”) trades on behalf of client accounts will not be conducted. Since your transactions are completed independently at a service provider of your choice, you may potentially pay more for your transaction than those accounts where trades have been aggregated.

### **Item 13 - Review of Accounts**

#### *Periodic Reviews*

You should contact our firm for additional reviews when making decisions about changes in your financial situation (i.e., change of employment status, retirement, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances).

Periodic financial check-ups or reviews are recommended if you are receiving our financial planning and investment consultation services, and we recommend that they occur at least on an annual basis whenever practical. Reviews will be conducted by your financial advisor and normally involve analysis and possible revision of your previous financial plan or investment allocation. Unless provided for in your engagement agreement, reviews are generally conducted under a new or amended agreement and will be assessed at our current fee rate.

#### *Non-Periodic Reviews*

You are free to contact our firm for additional reviews when there are material changes that occur in your financial situation i.e., change of employment status, receipt of a significant bonus, an inheritance, the birth of a new child, or other circumstances), or should you prefer to change requirements involving your account.

Non-periodic reviews are generally conducted by your financial advisor and under a new or amended

agreement; fees are assessed at our published rate.

#### *Client Reports*

Whether you have opened and maintained an investment account on your own or with our assistance, you will receive account statements sent directly from mutual fund companies, transfer agents, custodians or brokerage companies where your investments are held. We urge you to carefully review these statements for accuracy and clarity, and to ask questions when something is not clear.

Our firm may provide a client portfolio “snapshots” when engaged to provide periodic asset allocation or investment advice, but we do not provide account performance reports through this form of advisory engagement.

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

#### **Economic Benefit from External Sources and Potential Conflicts of Interest**

We may receive an economic benefit from external sources (which we may be affiliated with or may offer referral to) in the form of the support products and services they make available to our firm. Investment supervisory services clients should review our Form ADV Part 2A - Appendix 1 (wrap fee brochure) for further details.

As part of our fiduciary duty, BCU Wealth Advisors, LLC endeavors at all times to put the interests of our clients first. Our clients should be aware, however, that the receipt of any economic benefit by our firm or its associates in and of itself creates a potential conflict of interest and may influence our choice of external providers.

#### **Advisory Firm Payments for Client Referrals**

##### ***Solicitor Engagements***

We may enter into a solicitation relationship with other entities or persons, as may be allowed by the Investment Advisers Act and jurisdictional statute, for the purpose of referring potential clients to engage our firm for its investment strategies or advisory services. Our firm may pay these solicitors for such referrals a fixed fee or a percentage of our advisory fee not to exceed 30% of the asset-based fee that will be described within the solicitor disclosure. Clients that are referred to our firm under this arrangement do not pay more for their services than any other.

##### ***Internal Referrals***

As a subsidiary of Baxter Credit Union, our firm may receive and offer referrals among the various affiliates noted in Item 10 of this brochure. We provide this as a service to all our firm clients and members of our organizational parent. A credit union employee may be directly or indirectly compensated by a nominal fee for these introductions; however, at no time will this compensation be derived from the advisory services clients receive from our firm unless the associate is appropriately registered or exempt from registration.

##### ***Industry Memberships***

Investment advisor representatives of our firm may hold individual membership or serve on boards or committees of professional industry associations. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and educational requirements. A benefit these entities may provide to the investing public is the availability of online search tools that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may provide means for interested



persons to contact a participant via electronic mail, telephone number, or other contact information, in order to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area and would receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all of these entities' websites (or other listings). Prospective clients locating our firm or one of our associates via these methods are not actively marketed by the noted associations. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement reflective of a solicitor engagement.

#### **Item 15 - Custody**

Your funds and securities will be maintained by an unaffiliated, qualified custodian, such as a broker/dealer, mutual fund company, or transfer agent. Your assets are not physically held by our firm or any of our associates. In keeping with our policy in this matter we:

- Are prohibited from having authority to withdraw securities from a client account, and advisory fees will only be withdrawn from a client investment account through a qualified custodian maintaining account assets, per your prior written authorization;
- Restrict our firm and associates from serving as trustee or having general power of attorney over a client account;
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our firm;
- Will not collect advance fees of \$1,200 or more for advisory services that are to be performed six months or more into the future; and
- Will not authorize any associate to have knowledge of a client's account access information (i.e., online 401(k), brokerage or bank accounts) when such access might result in physical control over client assets.

BCU Wealth Advisors, LLC is a wholly owned subsidiary of Baxter Credit Union. Advisory firm management and associated personnel remain operationally independent of credit union operations. Our advisory firm does not own or control another financial services entity. In addition, internal control assessments are periodically made to ensure such separation is consistently maintained.

You will be provided with transaction confirmations and summary account statements sent directly to you from your custodian of record. Typically, statements are provided on at least a quarterly basis or as transactions occur within your account. You are urged to carefully review your account statements that you have received directly from your custodian. Our advisory firm will not create an account statement for you or serve as the sole recipient of your account statements.

Clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

#### **Item 16 - Investment Discretion**

Clients may authorize the firm to exercise investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, the firm is authorized to execute securities transactions: which securities are bought and sold, the total amount to be bought and sold, and the costs at which the transactions will be effected. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with the firm's written acknowledgement.

We will not provide transactional services nor have investment authority under this form of limited engagement. Clients will require support from their selected broker/dealer or custodian of record.

#### **Item 17 - Voting Client Securities**

You may receive proxies or other similar solicitations sent directly from your selected custodian or transfer agent. Should we receive a duplicate copy, note that we do not generally forward these or any correspondence relating to the voting of your securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on your behalf nor do we offer guidance on how to vote proxies. Clients maintain exclusive responsibility for directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted as well as making all other elections relative to mergers, acquisitions, tender offers or other events pertaining to the client's investment assets.

We do not offer guidance on or have the power, authority, responsibility, or obligation to take any action with regard to any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in a client account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

#### **Item 18 - Financial Information**

Our advisory firm will not take physical custody of your assets. Should there be advisory fee withdrawals from your investment account it must be done through an independent, qualified intermediary (e.g., your custodian of record) and per your prior written agreement. Engagements with our firm do not require that we collect fees from you of \$1,200 or more for our advisory services that we have agreed to perform six months or more into the future. Neither our advisory firm nor its management serve as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust. The firm and its management do not have a financial condition likely to impair our ability to meet our commitment to our clients, nor has the firm and its management been the subject of a bankruptcy petition at any time during the past 10 years. Due to the nature of our firm's services and operational practices, an audited balance sheet is not required nor included in this brochure.

#### ***Business Continuity Plan***

Our firm maintains a business continuity plan that is integrated with the entirety of our organization to ensure we appropriately respond to events that pose a significant disruption to its operations. A statement concerning our current plan is available under separate cover upon request.

**Our investment advisory services and investment vehicles offered**  
**Are Not NCUA/NCUSIF Insured | Are Not Credit Union Guaranteed | May Lose Value Including Principal**

## Privacy Policy

BCU Wealth Advisors  
340 N. Milwaukee Ave.  
Vernon Hills, IL 60061  
Toll Free: 800-388-7000 x 8908  
Rev 6/2012

### FACTS

#### WHAT DOES WEALTH ADVISORS DO WITH YOUR PERSONAL INFORMATION?

|              |  |
|--------------|--|
| <b>Why?</b>  | Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.                                 |
| <b>What?</b> | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>■ Name, address, Social Security Number, and income</li> <li>■ Account balances and payment history</li> <li>■ Credit history and credit scores</li> </ul> |
| <b>How?</b>  | All financial companies need to share consumers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their consumers' personal information; the reasons Wealth Advisors chooses to share; and whether you can limit this sharing.                                       |

| Reasons we can share your personal information   | Does Wealth Advisors share? | Can you limit this sharing? |
|--|-----------------------------|-----------------------------|
| <b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus | Yes                         | No                          |
| <b>For our marketing purposes—</b> to offer our products and services to you   | Yes                         | No                          |
| <b>For joint marketing with other financial companies</b>  | Yes                         | No                          |
| <b>For our affiliates everyday business purposes—</b> information about your transactions and experiences  | Yes                         | No                          |
| <b>For our affiliates everyday business purposes—</b> information about your creditworthiness  | Yes                         | Yes                         |
| <b>For our affiliates to market to you</b>   | Yes                         | Yes                         |
| <b>For nonaffiliates to market to you</b>  | No                          | We don't share              |

|                             |                         |
|-----------------------------|-------------------------|
| <b>To limit our sharing</b> | Mail in the form below. |
|-----------------------------|-------------------------|

|  |   |
|--|---|
| <b>Mail-In Form</b><br><br>If you have a joint account, your choice(s) will apply to everyone on your account.<br><br>Mail to: BCU Wealth Advisors<br>Attention Charles Dimon, 340 N. Milwaukee, Ave. Vernon Hills, IL 60061 | Do not share my personal information with your affiliates to jointly market to me.<br><br>Name:<br><br>Address:<br><br>City, State, ZIP:<br><br>Account Number: |
|--|---|

| What we do  |  |
|---|--|
| How does Wealth Advisors protect my personal information? | To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We also maintain procedural safeguards to protect your personal information.   |
| How does Wealth Advisors collect my personal information? | <ul style="list-style-type: none"> <li>■ We collect your personal information, for example, when you</li> <li>■ open an account</li> <li>■ make deposits or withdrawals from your account</li> <li>■ use your credit or debit card</li> </ul> <p>We also collect your personal information from others such as, credit bureaus, affiliates, or other companies.</p>  |
| Why can't I limit all sharing?                            | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p> |
| Definitions   |  |
| Affiliates  | <p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Wealth Advisors has the affiliate, BCU.</i></li> </ul>  |
| Nonaffiliates   | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Wealth Advisors does not share with nonaffiliates so they can market to you.</i></li> </ul>   |
| Joint marketing   | <p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Our joint marketing partners include insurance companies, investment and brokerage firms, and other types of financial product and service companies.</i></li> </ul>   |

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8701

[www.bcuwa.org](http://www.bcuwa.org)

## John Todd Anderson

Financial Advisor

Investment Adviser Representative

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about John Todd Anderson that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about John Todd Anderson is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

### Name

John Todd Anderson

### Year of Birth    CRD #

1965                      1866885

### Educational Background

Bachelor of Arts in Economics, University of Wisconsin; Madison, WI, 1988

Investment Company Products/Variable Contracts Representative Examination/FINRA Series 6, 07/2000; General Securities Representative Examination/FINRA Series 7, 04/2007; Uniform Securities State Agent Law Examination/NASAA Series 63, 07/2000; Uniform Combined State Law Examination/NASAA Series 66, 12/2006

Illinois Insurance Agent License (Producer # 2166990)

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (04/2013-Present), Vernon Hills, IL, Investment Adviser Representative

CUSO Financial Services, LP (07/2010-Present), Vernon Hills, IL, Registered Representative/Investment Adviser Representative located at Baxter Credit Union

## **Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. Anderson.

## **Item 4 - Other Business Activities**

Mr. Anderson is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. Anderson is also a licensed insurance agent and he is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties

through various unaffiliated insurance companies where he may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of his time during business hours each month.

Due to business arrangements Baxter Credit Union/BCU Investment Advisors has in place to serve its field of membership, Mr. Anderson is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to his role as an investment adviser representative of BCU Wealth Advisors, LLC, Mr. Anderson may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where he may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. His roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Mr. Anderson is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

In sum, Mr. Anderson may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. He is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which he is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and he will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference his role with the noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Mr. Anderson an incentive to recommend investments based on the compensation he may receive rather than on the client's needs, notwithstanding this issue, both Mr. Anderson and BCU Wealth Advisors, LLC take their responsibilities seriously and only intend to recommend investments and advisory services believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Mr. Anderson by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,

- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. Anderson's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. Anderson is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. Anderson's individual reference number is 1866885. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

**Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|



# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8730

[www.bcuwa.org](http://www.bcuwa.org)

## Judy Anne Evers

Financial Advisor

Investment Adviser Representative

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about Judy Anne Evers that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about Judy Anne Evers is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

### Name

Judy Anne Evers

### Year of Birth    CRD #

1946                      3184225

### Educational Background

Bachelor of Science in Education, Northern Illinois University; DeKalb, IL, 1970

CERTIFIED FINANCIAL PLANNER™, CFP®; Certified Financial Planner Board of Standards, Inc., 1998

General Securities Representative Examination/FINRA Series 7, 03/1999; Uniform Combined State Law Examination/NASAA Series 66, 03/1999

Illinois Insurance Agent License (Producer # 2652996)

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (11/2012-Present), Vernon Hills, IL, Investment Adviser Representative

CUSO Financial Services, LP (07/2010-12/2017), Vernon Hills, IL, Registered Representative/Investment Adviser Representative located at Baxter Credit Union

## Item 3 - Disciplinary Information

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

criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Ms. Evers.

#### **Item 4 - Other Business Activities**

Ms. Evers is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with her activities noted within this brochure supplement.

Ms. Evers is also a licensed insurance agent and she is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through various unaffiliated insurance companies where she may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of her time during business hours each month.

Ms. Evers is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will she offer commodities or futures products through these types of entities.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Ms. Evers by requiring that she adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that she may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Ms. Evers' supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Ms. Evers is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors,

LLC is 164173; Ms. Evers' individual reference number is 3184225. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

**Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8706

[www.bcuwa.org](http://www.bcuwa.org)

## Bryan Patrick Farrissey, CFP®

Financial Advisor

Investment Adviser Representative

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about Bryan Patrick Farrissey that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about Bryan Patrick Farrissey is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

### Name

Bryan Patrick Farrissey

### Year of Birth    CRD #

1964                      4484959

### Educational Background

CERTIFIED FINANCIAL PLANNER™, CFP®; Certified Financial Planner Board of Standards, Inc., 05/2013

Bachelor of Science in Management Technology, Purdue University; West Lafayette, IN, 1986

Masters of Business Administration, University of South Carolina; Columbia, SC, 1995

Investment Company Products/Variable Contracts Representative Examination/FINRA Series 6, 12/2001; General Securities Representative Examination/FINRA Series 7, 06/2002; Uniform Securities State Agent Law Examination/NASAA Series 63, 01/2002; Uniform Combined State Law Examination/NASAA Series 66, 10/2004

Illinois Insurance Agent License (Producer # 7016533)

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (04/2013-Present), Vernon Hills, IL, Investment Adviser Representative

CUSO Financial Services, LP (07/2010-Present), Vernon Hills, IL, Registered Representative/Investment Adviser Representative located at Baxter Credit Union

**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. Farrissey.

**Item 4 - Other Business Activities**

Mr. Farrissey is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. Farrissey is also a licensed insurance agent and he is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through various unaffiliated insurance companies where he may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of his time during business hours each month.

Due to business arrangements Baxter Credit Union/BCU Investment Advisors has in place to serve its field of membership, Mr. Farrissey is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to his role as an investment adviser representative of BCU Wealth Advisors, LLC, Mr. Farrissey may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where he may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. His roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Mr. Farrissey is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

In sum, Mr. Farrissey may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. He is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which he is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and he will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference his role with the noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Mr. Farrissey an incentive to recommend investments based on the compensation he may receive rather than on the client's needs, notwithstanding this issue, both Mr. Farrissey and BCU Wealth Advisors, LLC take their

responsibilities seriously and only intend to recommend investments and advisory services believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Mr. Farrissey by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. Farrissey's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. Farrissey is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. Farrissey's individual reference number is 4484959. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

#### **Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|



# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8710

[www.bcuwa.org](http://www.bcuwa.org)

## David Lynn James

Financial Advisor

Investment Adviser Representative

1212 Alton Parkway

Irvine, CA 92606

(949) 250-5049

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about David Lynn James that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about David Lynn James is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

### Name

David Lynn James

### Year of Birth    CRD #

1947                      1518984

### Educational Background

Bachelors of Science in Business Administration & Psychology, Ball State University; Muncie, IN, 1970

National Commodity Futures Examination/NFA Series 3, 11/1984; General Securities Representative Examination/FINRA Series 7, 07/1986; Uniform Securities State Agent Law Examination/NASAA Series 63, 07/1986; Uniform Investment Adviser Law Exam/NASAA Series 65, 06/1999

California Insurance Agent License (Producer # 0785668)

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (04/2013-Present), Irvine, CA, Investment Adviser Representative  
CUSO Financial Services, LP (07/2010-12/2017), Irvine, CA, Registered  
Representative/Investment Adviser Representative located at Baxter Credit Union

## **Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. James.

## **Item 4 - Other Business Activities**

Mr. James is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. James is also a licensed insurance agent and he is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through

various unaffiliated insurance companies where he may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of his time during business hours each month.

Mr. James is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Mr. James by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. James' supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. James is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. James' individual reference number is 1518984. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

#### **Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8706

[www.bcuwa.org](http://www.bcuwa.org)

## James L. Kastner, CFP®

Financial Advisor

Investment Adviser Representative

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about James L. Kastner that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about James L Kastner is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

### Name

James Lawrence Kastner

### Year of Birth    CRD #

1957                      4211485

### Educational Background

CERTIFIED FINANCIAL PLANNER™, CFP®; Certified Financial Planner Board of Standards, Inc., 11/2003

Bachelor of Business Administration (Finance), Francis Marion University; Florence, SC, 1997  
Associates of Applied Science in Mechanical Engineering, Rochester Institute of Technology; Rochester, NY, 1994

General Securities Representative Examination/FINRA Series 7, 07/2000; Uniform Combined State Law Examination/NASAA Series 66, 07/2000

Illinois Insurance Agent License (Producer # 3415215)

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (05/2013-Present), Vernon Hills, IL, Investment Adviser Representative

Baxter Credit Union (05/2013-Present), Vernon Hills, IL, Financial Planner

CUSO Financial Services, LP (05/2013-Present), Vernon Hills, IL, Registered Representative/Investment Adviser Representative located at Baxter Credit Union

Cetera Advisor Networks LLC (06/2011-04/2013), Crystal Lake, IL, Registered Representative/Investment Adviser Representative

Harbour Investments, Inc. (01/2004-06/2011), Crystal Lake, IL & Kalamazoo, MI, Registered Representative/Investment Adviser Representative  
Burnham & Flower Agency, Inc. (12/2003-09/2010), Kalamazoo, MI, Insurance Agent

### **Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. Kastner.

### **Item 4 - Other Business Activities**

Mr. Kastner is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. Kastner is also a licensed insurance agent and he is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through various unaffiliated insurance companies where he may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of his time during business hours each month.

Due to business arrangements Baxter Credit Union/BCU Investment Advisors has in place to serve its field of membership, Mr. Kastner is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to his role as an investment adviser representative of BCU Wealth Advisors, LLC, Mr. Kastner may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where he may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. His roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Mr. Kastner is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

In sum, Mr. Kastner may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. He is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which he is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and he will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference his role with the

noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Mr. Kastner an incentive to recommend investments based on the compensation he may receive rather than on the client's needs, notwithstanding this issue, both Mr. Kastner and BCU Wealth Advisors, LLC take their responsibilities seriously and only intend to recommend investments and advisory services believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Mr. Kastner by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. Kastner's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. Kastner is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. Kastner's individual reference number is 4211485. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

#### **Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8730

[www.bcuwa.org](http://www.bcuwa.org)

## Kristi Lynn Mertens, CFP®

Financial Advisor

Investment Adviser Representative

1000 Nicollet Mall/TPN-228

Minneapolis, MN 55403

(847) 932-8658

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about Kristi Lynn Mertens that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about Kristi Lynn Mertens is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

### Name

Kristi Lynn Mertens

### Year of Birth    CRD #

1976                      4789908

### Educational Background

Bachelor of Science in Business Administration, North Dakota State University; Fargo, ND, 2004  
CERTIFIED FINANCIAL PLANNER™, CFP®; Certified Financial Planner Board of Standards, Inc.,  
May 2009

General Securities Representative Examination/FINRA Series 7, 05/2004; Uniform Securities  
State Agent Law Examination/NASAA Series 63, 05/2004

Minnesota Insurance Agent License (Producer # 20474678), Wisconsin Insurance Agent License,  
Massachusetts Insurance Agent License, California Insurance Agent License, Virginia Insurance  
Agent License

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (04/2013-Present), Minneapolis, MN, Investment Adviser  
Representative

CUSO Financial Services, LP (08/2012-Present), Minneapolis, MN, Registered  
Representative/Investment Adviser Representative located at Baxter Credit Union

## **Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or

disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Ms. Mertens.

#### **Item 4 - Other Business Activities**

Ms. Mertens is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with her activities noted within this brochure supplement.

Ms. Mertens is also a licensed insurance agent and she is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through various unaffiliated insurance companies where she may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of her time during business hours each month.

Due to business arrangements Baxter Credit Union/BCU Investment Advisers has in place to serve its field of membership, Ms. Mertens is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to her role as an investment adviser representative of BCU Wealth Advisors, LLC, Ms. Mertens may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where she may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. Her roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Ms. Mertens is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will she offer commodities or futures products through these types of entities.

In sum, Ms. Mertens may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. She is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which she is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and she will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference her role with the noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Ms. Mertens an incentive to recommend investments based on the compensation she may receive rather than on the client's needs, notwithstanding this issue, both Ms. Mertens and BCU Wealth Advisors, LLC take their responsibilities seriously and only intend to recommend investments and advisory services

believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Ms. Mertens by requiring that she adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that she may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Ms. Mertens' supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Ms. Mertens is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Ms. Mertens' individual reference number is 4789908. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

#### **Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

847-932-8007

[www.bcuwa.org](http://www.bcuwa.org)

## Edwin Thomas Watson, CFP®

President

Board Member

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about Edwin Thomas Watson that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about Edwin Thomas Watson is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

Name

Edwin Thomas Watson

Year of Birth    CRD #

1966              4448255

### Educational Background

Bachelor of Science in Finance, Pennsylvania State University; University Park, PA, 1988

CERTIFIED FINANCIAL PLANNER™, CFP®; Certified Financial Planner Board of Standards, Inc., 06/2007

Licensed Insurance Agent; Illinois Department of Insurance

In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

### Business Experience

BCU Wealth Advisors, LLC (2011-Present), Vernon Hills, IL, President/Board Member

Genworth Financial, Inc. (2004-2011), Richmond, VA, VP, Strategic Accounts

GE Financial (2001-2004), Richmond, VA, VP, Strategic Accounts

## **Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. Watson.

## **Item 4 - Other Business Activities**

Mr. Watson is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. Watson is not registered nor has an application pending to register as an associated person

of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

Mr. Watson is a licensed insurance agent and may periodically serve in that capacity when called upon involving BCU Wealth Advisors, LLC clients.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Mr. Watson by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. Watson's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. Watson is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. Watson's individual reference number is 4448255. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

#### **Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8730

[www.bcuwa.org](http://www.bcuwa.org)

## Heather Marsland Wright

Financial Advisor

Investment Adviser Representative

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8730

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about Heather M. Wright that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about Heather M. Wright is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

Name

Heather Marsland Wright

Year of Birth    CRD #

1962              1663805

### Educational Background

Masters of Business Administration, DePaul University; Chicago, IL, 1998

Bachelor of Arts in Political Science, Southern Methodist University; Dallas, TX, 1980

Graduate of Cannon Trust School, Trust I – III, 10/2011

Investment Company Products/Variable Contracts Representative Examination/FINRA Series 6, 04/2001; General Securities Representative Examination/FINRA Series 7, 02/2003; Uniform Securities State Agent Law Examination/NASAA Series 63, 05/2001; Uniform Combined State Law Examination/NASAA Series 66, 09/2013

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

### Business Experience

BCU Wealth Advisors, LLC (07/2017-Present), Vernon Hills, IL, Investment Adviser Representative

Baxter Credit Union (07/2017-Present), Vernon Hills, IL, Financial Advisor

CUSO Financial Services, LP (06/2017-Present), San Diego, CA, Registered

Representative/Investment Adviser Representative located at Baxter Credit Union

Coldwell Banker (07/2015-Present), Lake Forest, IL, Realtor

GEM Financial Advisors, Inc. (07/2016-05/2017), Lake Forest, IL, Investment Adviser Representative

LPL Financial LLC (07/2016-05/2017), Lake Forest, IL, Registered Representative

Unemployed (01/2015-07/2015), Lake Forest, IL

First Community Trust (11/2014-12/2014), Dubuque, IA, Representative

Lorum Financial Management, LP (07/2014-10/2014), Lombard, IL, Investment Adviser Representative

Bank of America, NA (07/2013-07/2014)

Merrill Lynch, Pierce, Fenner & Smith, Incorporated (07/2013-07/2014), Northbrook, IL, Financial Advisor/Registered Representative/Investment Adviser Representative

BMO Harris Financial Advisors, Inc. (12/2005-10/2012), Harris Investor Services, Inc. (12/2005-07/2013), Chicago, IL, Registered Representative



**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Ms. Wright.

**Item 4 - Other Business Activities**

Ms. Wright is an employee of Baxter Credit Union, which may involve up to 160 hours each month, during business hours, and concurrent with her activities noted within this brochure supplement.

Ms. Wright is a licensed real estate agent; an activity that involves five percent of her time after business hours each month. Our advisory firm does not believe this activity presents a conflict of interest with its clients.

Due to business arrangements Baxter Credit Union/BCU Investment Advisors has in place to serve its field of membership, Ms. Wright is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to her role as an investment adviser representative of BCU Wealth Advisors, LLC, Ms. Wright may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where she may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. Her roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Ms. Wright is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will she offer commodities or futures products through these types of entities.

In sum, Ms. Wright may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. She is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which she is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and she will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference her role with the noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Ms. Wright an incentive to recommend investments based on the compensation she may receive rather than on the client's needs, notwithstanding this issue, both Ms. Wright and BCU Wealth Advisors, LLC take their

responsibilities seriously and only intend to recommend investments and advisory services believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Ms. Wright by requiring that she adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that she may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Ms. Wright's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Ms. Wright is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Ms. Wright's individual reference number is 1663805. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

#### **Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# BCU Wealth Advisors, LLC

SEC Registered Investment Adviser

BCU Wealth Advisors, LLC

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8056

[www.bcuwa.org](http://www.bcuwa.org)

## Jonathan David Wylie

Financial Advisor

Investment Adviser Representative

### Form ADV Part 2B

Brochure Supplement

October 29, 2018

This brochure supplement provides information about Jonathan David Wylie that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about Jonathan David Wylie is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

Name

Jonathan David Wylie

Year of Birth    CRD #

1990              6488027

**Educational Background**

Bachelor of Business Administration – Finance, University of Wisconsin, Oshkosh, WI, 2013  
General Securities Representative Examination/FINRA Series 7, 10/2015; Uniform Combined State Law Examination/NASAA Series 66, 11/2015  
Insurance Agent License

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

**Business Experience**

BCU Wealth Advisors, LLC (05/2018-Present), Vernon Hills, IL, Investment Adviser Representative  
CUSO Financial Services, LP (05/2018-Present), Vernon Hills, IL, Registered Representative/Investment Adviser Representative located at Baxter Credit Union  
MVP Financial Services (05/2018 – Present), Vernon Hills, IL, Insurance Agent  
Woodbury Financial Services, Inc. (10/2015-05/2018), West Bend, WI, Registered Representative/Investment Adviser Representative  
Reis Financial Services (04/2015-05/2018), West Bend, WI, Financial Services Assistant  
Acuity (01/2014-04/2015), Sheboygan, WI, Business Analyst  
Associated Bank (08/2013-12/2013), South Milwaukee, WI, Universal Banker  
College Works Painting (02/2013-08/2013), Oshkosh, WI, Branch Manager

**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. Wylie.

**Item 4 - Other Business Activities**

Mr. Wylie is an employee of Baxter Credit Union, which may involve up to 160 hours each

month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. Wylie is also a licensed insurance agent and he is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through various unaffiliated insurance companies where he may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of his time during business hours each month.

Due to business arrangements Baxter Credit Union/BCU Investment Advisors has in place to serve its field of membership, Mr. Wylie is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to his role as an investment adviser representative of BCU Wealth Advisors, LLC, Mr. Wylie may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where he may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. His roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Mr. Wylie is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

In sum, Mr. Wylie may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. He is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which he is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and he will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference his role with the noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Mr. Wylie an incentive to recommend investments based on the compensation he may receive rather than on the client's needs, notwithstanding this issue, both Mr. Wylie and BCU Wealth Advisors, LLC take their responsibilities seriously and only intend to recommend investments and advisory services believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

**Item 6 - Supervision**

We supervise Mr. Wylie by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. Wylie's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. Wylie is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. Wylie's individual reference number is 6488027. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

**Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|

# **BCU Wealth Advisors, LLC**

SEC Registered Investment Adviser

## **BCU Wealth Advisors, LLC**

340 N. Milwaukee Avenue

Vernon Hills, IL 60061

(847) 932-8704

[www.bcuwa.org](http://www.bcuwa.org)

## **James Harold Yocom III**

Financial Advisor

Investment Adviser Representative

1212 Alton Parkway

Irvine, CA 92606

(847) 932-8146

### **Form ADV Part 2B**

Brochure Supplement

October 29, 2018

This brochure supplement provides information about James H. Yocom III that supplements the BCU Wealth Advisors, LLC Form ADV Part 2A advisory brochure and/or Form ADV Part 2A - Appendix 1 wrap fee program brochure. You should have received a copy of that brochure. Please contact Mr. Scott Comeau, Chief Compliance Officer, at 847-932-8007 if you did not receive the BCU Wealth Advisors, LLC's Form ADV Part 2A or Form ADV Part 2A - Appendix 1 brochure or if you have any questions about the contents of this supplement. Additional information about James H. Yocom III is available on the Securities and Exchange Commission's (SEC) website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Regulatory guidance requires the firm to disclose through Form ADV Part 2B relevant post-secondary education and professional training for each associate of the firm, as well as their business experience for at least the past five years.

Name

James Harold Yocom III

Year of Birth    CRD #

1968                2256731

**Educational Background**

Bachelor of Arts in Finance and Marketing, Temple University, Philadelphia, PA, 12/1991

Investment Company Products/Variable Contracts Representative Examination/FINRA Series 6, 01/1993; General Securities Representative Examination/FINRA Series 7, 02/2010; Uniform Securities State Agent Law Examination/NASAA Series 63, 01/1997; Uniform Investment Adviser Law Exam/NASAA Series 65, 10/2013

Licensed Insurance Agent

FINRA, NFA, NASAA and insurance industry examinations are "criterion based;" candidates who pass the exam are considered to have met the minimum competency level. The completion of a securities or insurance industry examination does not constitute or imply a person is "approved" or "endorsed" by a securities regulatory organization, state securities or state insurance commissioner.

**Business Experience**

BCU Wealth Advisors, LLC (11/2016-Present), Vernon Hills, IL (Irvine, CA Office), Investment Adviser Representative

Baxter Credit Union (11/2016-Present), Vernon Hills, IL (Irvine, CA Office), Financial Advisor  
CUSO Financial Services, LP (10/2016-Present), San Diego, CA (Irvine, CA Office), Registered Representative/Investment Adviser Representative located at Baxter Credit Union

Unionbanc Investment Services, LLC (05/2016-10/2016), Glendale, CA, Senior Financial Advisor/Registered Representative/Investment Adviser Representative

Lincoln Financial Distributors, Inc. (02/2012-08/2013), Radnor, PA (Huntington Beach, CA Office), External Wholesaler

**Item 3 - Disciplinary Information**

Registered investment advisers are required to disclose material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item. There are no reportable criminal or civil actions, administrative enforcement proceedings, self-regulatory organization enforcement proceedings or any other proceedings applicable to Mr. Yocom.

**Item 4 - Other Business Activities**

Mr. Yocom is an employee of Baxter Credit Union, which may involve up to 160 hours each



month, during business hours, and concurrent with his activities noted within this brochure supplement.

Mr. Yocom is also a licensed insurance agent and he is able to offer fixed and variable annuities, life and health insurance, as well as long term care coverage to interested parties through various unaffiliated insurance companies where he may receive commission or renewal payments from the issuer on a client's purchase of an insurance contract. This activity may involve up to 20% of his time during business hours each month.

Due to business arrangements Baxter Credit Union/BCU Investment Advisors has in place to serve its field of membership, Mr. Yocom is also a registered representative and investment adviser representative associated with CUSO Financial Services, LP (a San Diego, CA FINRA broker/dealer and SEC registered investment adviser) under an independent contractor engagement pursuant to a networking agreement. In addition to his role as an investment adviser representative of BCU Wealth Advisors, LLC, Mr. Yocom may also serve as a commissioned- based registered representative of the FINRA-member broker/dealer CUSO Financial Services, LP and/or investment adviser representative where he may receive an advisory fee for services offered through CUSO Financial Services, LP's registered investment advisory firm. His roles with CUSO Financial Services, LP may involve up to 140 hours per month, including during business hours.

Mr. Yocom is not registered nor has an application pending to register as an associated person of a NFA-member broker/dealer, futures commission merchant, commodity pool operator, or commodity trading advisor or any other entity supervised by the NFA or CFTC, nor will he offer commodities or futures products through these types of entities.

In sum, Mr. Yocom may serve clients as a licensed insurance agent, registered representative of a FINRA broker/dealer, and/or investment adviser representative of one or more investment advisory firms. He is required to disclose (in advance of a brokerage transaction or advisory service) the capacity in which he is serving a client, to include the potential or actual conflict of interest the role or service to be provided may incur and he will provide the client/prospective client with the appropriate Form ADV Part 2A and 2B which will reference his role with the noted firm and the services or advice to be offered. Further, the potential for the receipt of commissions and other compensation may give Mr. Yocom an incentive to recommend investments based on the compensation he may receive rather than on the client's needs, notwithstanding this issue, both Mr. Yocom and BCU Wealth Advisors, LLC take their responsibilities seriously and only intend to recommend investments and advisory services believed appropriate for the client.

#### **Item 5 - Additional Compensation**

BCU Wealth Advisors, LLC prohibits employees from accepting or receiving additional economic benefit, such as sales awards or other prizes, for providing advisory services to its clients. The firm also prohibits compensation for advisory services involving performance-based fees.

#### **Item 6 - Supervision**

We supervise Mr. Yocom by requiring that he adhere to our processes and procedures as described in our firm's Code of Ethics and procedural guidelines. We will monitor the advice that he may provide you by performing the following ongoing reviews/requirements:

- Account opening documentation when the relationship is established,
- Daily review of account transactions,
- Oversight of your financial situation, objectives, and investment needs,
- Client correspondence,
- Requiring each associate at least annually review and attest to firm policy, and
- Periodic branch office reviews.

Scott Comeau is the firm's Chief Compliance Officer and serves as Mr. Yocom's supervisor involving investment advisory services offered through BCU Wealth Advisors, LLC. Questions relative to BCU Wealth Advisors, LLC, its Form ADV Part 2A, or this ADV Part 2B may be made to the attention of Mr. Comeau at [Scott.Comeau@bcu.org](mailto:Scott.Comeau@bcu.org) or 847-932-8007.

Additional information about the firm, other advisory firms, or associated investment adviser representatives, including Mr. Yocom is available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The IARD number for BCU Wealth Advisors, LLC is 164173; Mr. Yocom's individual reference number is 2256731. The business and disciplinary history, if any, of an investment advisory firm and its representatives may also be obtained by calling a state securities administrator office.

**Our investment advisory services and investment vehicles offered**

|                                    |  |   |
|------------------------------------|--|---|
| <b>Are Not NCUA/NCISIF Insured</b> | <b>Are Not Credit Union Guaranteed</b> | <b>May Lose Value Including Principal</b> |
|------------------------------------|--|---|