



# Form ADV Part 2A for Selective Wealth Management LLC

Selective Wealth Management LLC

May 7<sup>th</sup>, 2018

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This brochure provides information about the qualifications and business practices of Selective Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at (434) 515-1517 or by email at: [JStandeven@SelectiveWM.com](mailto:JStandeven@SelectiveWM.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Selective Wealth Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Selective Wealth Management LLC's CRD number is: 164882. Selective Wealth Management LLC's SEC number is: 801-108568.

Registration does not imply a certain level of skill or training

**Connect with Selective** > [www.selectivewm.com](http://www.selectivewm.com) > 434-515-1517

## Item 2: Material Changes

- Item 5 has been updated to reflect the ability to calculate fees based on an agreed upon account value with the client. This exception will be used when daily account values are not accessible.
- Item 17 was updated to reflect that from time-to-time the Firm may refrain from voting proxies.

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## Item 4: Advisory Business

### A. Description of Advisory Firm

Selective Wealth Management LLC is a Limited Liability Company organized in the State of Virginia. The firm was formed in June of 2012, and the principal owner is Christopher James Devlin

### B. Types of Advisory Services

Selective Wealth Management LLC (hereinafter the Firm) offers the following services to advisory clients:

#### Advisory Services

##### Separately Managed Accounts

The Firm offers ongoing portfolio management services based on client specific investment objectives, risk tolerances, and financial information. Many clients, however, invest for access to the Selective Opportunity Fund Family (Fund); a mutual fund managed by the Firm. The Firm creates an Investment Policy Statement for each client, which outlines specific individual situations (income, tax levels, and risk tolerance levels), and then ensures the investment plan is suitable for the prospective client based on gathered data. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

The Firm will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

##### Mutual Fund Management

Selective serves as the investment adviser of the Selective Opportunity Fund, an opened-end registered Investment Company, and utilizes it as the primary equity investment for clients. The Fund is a non-diversified mutual fund with the primary investment objective of maximizing long-term returns while protecting client principal. The Fund implements the Selective Process to construct an equity portfolio of what Selective believes to be excellent businesses purchased at attractive valuations. For more information on the Selective Process please see the prospectus and the overview set forth in Item 8 below.

Certain persons listed on Schedule A of Selective's Part 1 of Form ADV are Officers of the Fund. As Officers, these persons are involved in the day-to-day management of the

Fund. To address any potential conflicts of interests, these persons are subject to Selective's Code of Ethics which are overseen and implemented by the Firm's Chief Compliance Officer. Additionally, there is an independent Board of Trustees that provides resources, and administrative services, and some supervisory services related to the Fund.

The following services are supervised by the Board of Trustees of the Fund:

- The advisory services and the administrative services agreement between Selective and the Fund

Selective believes that the client/advisor relationship dynamics around the Fund create material conflicts of interest that clients should be aware of. These conflicts of interest deal primarily with investment allocations decisions and fees. Selective has taken steps to mitigate these conflicts through the Code of Ethics policies, but below are some issues that arise from this dynamic:

- Selective exercises investment discretion over investment accounts, which allows for investments into the Fund
- The more assets that are in the Fund, the more attractive the Fund is for other investors. This creates an incentive to put more client assets into the Fund
- Accidentally double-charging for investments in the Fund.
- Investment allocation between the Fund and separately managed accounts when a security is suitable for both.

##### Financial Planning

Selective offers financial planning for certain clients on a discretionary basis. Financial planning may include, but is not limited to investment planning, life insurance planning, tax concerns, retirement planning, college planning, and debt/credit planning.

*Selective reserves the right to provide tiered services based on account sizes.*

##### **Services Limited to Specific Types of Investments**

The Firm generally limits its money management to The Selective Opportunity Fund™, Equity ETFs, Fixed Income ETFs, individual equities, and options (primarily covered calls). However, when applicable, the Firm may use other securities as well to develop a portfolio suitable for each specific client.

### C. Client Tailored Services and Client Imposed Restrictions

The Firm provides advice that is tailored to the individual needs of the client based on the financial information and the investment objective(s) communicated by the client.

Clients may impose reasonable restrictions on investing in certain securities or groups of securities by notifying the Firm in writing.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent The Firm from properly servicing the client account, or if the restrictions would require The Firm to deviate from its standard suite of services, The Firm reserves the right to end the relationship.

#### *D. Wrap Fee Programs*

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. The Firm does not participate in any wrap fee programs.

#### *E. Amounts Under Management*

As of May 7<sup>th</sup>, 2018, The Firm has \$107,485,008 in Assets Under Management. Below is a breakdown of what is considered discretionary and non-discretionary:

- Discretionary - \$107,485,008
- Non-Discretionary - \$0

### **Item 5: Fees & Compensation**

#### *A. Fee Schedule*

##### **Investment Supervisory Services Fees**

Account Type	Annual Fee
All Accounts	1.25%

Selective charges an advisory fee of 1.25% (125bps) based on assets under management (AUM). Fees are paid monthly in arrears and are based on the average ending daily account balance for the previous month. This is calculated on the market value of securities as reported at the close of the market. If market data for the value of an account is not available Selective will use the most up-to-date account value possible provided by the client. Clients may terminate their contracts with one day written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's account with written authorization. Lower fees for comparable services may be available from other sources. Fees are negotiable.

Additionally, Selective is the adviser to the Selective Opportunity Fund, the primary equity investment vehicle used for clients. The Fund has an advisory fee; however, clients are never double billed. The Fund Advisory fee is credited towards the investment advisory

fee on a dollar for dollar basis. The Fund advisory fee is calculated based on the average daily net assets of the Fund.

The Fund is available only to clients who have entered into an investment advisory contract with the Firm or with an approved adviser. Management of the Fund creates a conflict of interest. For more information please see the Fund prospectus.

#### *B. Payment of Fees*

##### **Payment of Investment Supervisory Fees**

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in arrears. The Selective Opportunity Fund managed by Selective pays the rate described above at the end of each month in arrears.

#### *C. Clients Are Responsible For Third Party Fees*

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by The Firm. Please see Item 12 of this brochure regarding broker/custodian.

#### *D. Prepayment of Fees*

The Firm collects its fees in arrears. It does not collect fees in advance.

#### *E. Outside Compensation for the Sale of Securities to Clients*

Neither the Firm nor its supervised persons accepts any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

### **Item 6: Performance-Based Fees & Side-by-Side Management**

The Firm does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. The Firm would consider performance-based fees for institutional accounts over a certain asset value.

### **Item 7: Types of Clients**

The Firm generally provides management supervisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Family Offices
- Charitable Organizations
- Institutional Clients

\*The Firm does hold itself out to Trusts, Estates, and Funds

#### **Minimum Account Size**

There is a \$10,000 minimum for taxable accounts and a \$5,500 for retirement accounts. From time-to-time these minimums may be waived. Selective reserves the right to provide tiered services based on account sizes.

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

#### *A. Methods of Analysis and Investment Strategies*

##### **Methods of Analysis**

The Firm's methods of analysis include fundamental analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

##### **Investment Strategies**

The Firm primarily utilizes long term trading for tax efficiency. However, short term trading may be required from time-to-time and Selective reserves the right to use it where necessary. When applicable, the Firm concentrates on investments to capitalize on growth potential. The equity portion of client accounts are primarily invested in the Fund - a mutual fund managed by Selective (See Item 10 for additional details).

##### **Principal Investment Strategies of the Fund**

The Fund invests primarily in equity securities of U.S. and foreign companies of any market capitalization that the Fund's adviser believes possess a durable competitive advantage and are capable of producing superior returns. The Fund's adviser, Selective Wealth Management, LLC, uses its Selective Process to identify companies that the adviser believes (1) produce products or services for which there are few good substitutes, (2) have a durable competitive advantage, (3) are highly profitable (as measured by return on equity), (4) have prudent debt levels, (5) have management that skillfully reinvests earnings, and (6) are led by outstanding individuals. The adviser considers companies meeting all six criteria to be "Selective Companies," and seeks to add the securities of these companies to the Fund's portfolio at attractive valuations.

The Fund may also invest in companies based on special situations, such as companies that the adviser believes may be involved in mergers, reorganizations, liquidations or recapitalizations that will cause an increase in value of the company. The adviser may make a decision to invest in such a company based on its fundamental analysis of a

company, or based on external factors, such as the filing of 13D reports with the SEC.

The Fund is non-diversified and focuses its investments in a relatively small number of Selective Companies, typically seeking to hold between 15 and 25 companies (although the number may vary depending on market conditions). The Fund may also invest a substantial portion of its assets in cash and cash equivalents, including money market funds and other short term fixed income investments, in seeking to protect principal.

Equity securities in which the Fund may invest include common stocks and preferred stocks. The Fund may invest in foreign companies either directly or through American Depositary Receipts ("ADRs") or Global Depositary Receipts ("GDRs"). The Fund may at times initiate a position in a Selective Company by writing (selling) a call option on the equity security at the same time it buys the security. This covered call position gives the Fund exposure to the Selective Company at a lower cost basis but gives up some of the upside return. The Fund may also purchase call options on equity securities of Selective Companies that it believes may increase substantially in value in the near future.

For additional information please see Fund Prospectus.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

#### *B. Material Risks Involved*

##### **Methods of Analysis**

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

##### **Investment Strategies**

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

##### **Fund Risk**

For risks associated with the Fund please see Fund Prospectus.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### *C. Risks of Specific Securities Utilized*

The Firm generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Options:** A financial derivative that represents a contract sold by one party (option writer) to another party (option holder). The contract offers the buyer the right, but not the obligation, to buy (call) or sell (put) a security or other financial asset at an agreed-upon price (the strike price) during a certain period of time or on a specific date (exercise date).

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk. This is The Firm's primary investment strategy even though Fixed Income and Short-term trading may be utilized when deemed appropriate.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

**Short term trading** risks include liquidity, economic stability and inflation.

**Fixed Income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Exchange Traded Funds (ETFs)** is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **Item 9: Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Firm or the integrity of its management. The Firm has no information applicable to this Item

### **Item 10: Other Financial Industry Activities & Affiliations**

#### *A. Registration as a Broker/Dealer or Broker/Dealer Representative*

Neither The Firm nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

#### *B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor*

Neither The Firm nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

#### *C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests*

Selective is investment adviser to Selective Opportunity Fund (the Fund, CUSIP #90470L 774) a mutual fund registered under the Investment Company Act of 1940. Selective will recommend investments in this private fund to those clients for which investment in the fund is suitable. This presents a conflict of interest. Nevertheless, Selective acts in the best interest of the client consistent with its fiduciary duties and clients are not required to invest in the private fund if they do not wish to do so.

The Firm manages the Fund and uses it as the primary equity investment for clients. The Firm uses Ultimus Fund Solutions ("Ultimus") for Fund administration and has set in place an independent Board of Trustees for Fund oversight. Ultimus does not provide investment advice for the Fund.

#### *D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections*

The Firm does not utilize nor select other advisers or third-party managers. All assets are managed by The Firm's management.

### **Item 11: Code of Ethics, Participation/Interest in Client Transactions & Personal Trading**

#### *A. Code of Ethics*

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

#### *B. Recommendations Involving Material Financial Interests*

Selective invests client assets into the Selective Opportunity Fund – a Fund Selective is the adviser to. Selective receives a management fee based on AUM for being the adviser. For additional information see the Fund Prospectus.

#### *C. Investing Personal Money in the Same Securities as Clients*

From time to time, representatives of The Firm may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of The Firm to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. The Firm will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

#### *D. Trading Securities At/Around the Same Time as Clients' Securities*

From time to time, representatives of The Firm may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of The Firm to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they

provide to clients. Such transactions may create a conflict of interest. The Firm will always transact client's transactions before its own when similar securities are being bought or sold.

All material conflicts of interest have been disclosed in this form ADV 2A.

### **Item 12: Brokerage Practices**

#### *A. Factors Used to Select Custodians and/or Broker/Dealers*

The Qualified Custodian(s) was chosen based on their relatively low transaction fees, name recognition, best execution, and suitability to individual client needs. The Firm will never charge a premium or commission on transactions, beyond the actual cost imposed by the Custodian.

Advisor is not affiliated with the brokerage firms. Brokers do not supervise the advisor, its agents or activities.

Selective generally recommends that clients use Shareholders Service Group (SSG) and/or Charles Schwab & Co., Inc. (Schwab).

#### **Research and Other Soft-Dollar Benefits**

The Firm does not receive research, products, or other services from its broker/dealer(s) or another third-party in connection with client securities transactions that would be termed "soft dollar benefits". However, due to the nature of a brokerage relationship Selective does receive certain benefits which are outlined below:

The Firm participates in institutional customer programs and may recommend certain brokers/custodians. There is no direct link between Selective's participation in the program and the investment advice given to clients, although Selective receives economic benefits through its participation in the program that are typically not available to "retail investors."

These benefits include, but are not limited to the following products and services (provided either without Cost or at a discount):

- receipt of duplicate client statements and confirmations;
- research related products and tools;
- consulting services;
- access to a trading desk serving clients;
- access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts);
- the ability to have advisory fees deducted directly from client accounts per a written agreement;



- access to an electronic communications network for client order entry and account information;
- access to mutual funds with no “loads” or transaction fees, and to certain institutional money managers;
- Discounts on research, technology, and practice management products or services provided to Selective by third party vendors. Some of the products and services made available by brokers/custodians may benefit Selective but may not benefit client accounts. These products or services may assist in managing and administering client accounts, including accounts not maintained by the custodians. These other services made available by the brokers/custodians are intended to help Selective manage and further develop its business. The benefits received by Selective or its associates through participation in a program do not depend on the amount of brokerage transactions directed to the brokers/custodians.
- Conferences
- Other training and/or educational materials
- Advertisement materials

As part of the fiduciary duty, Selective will at all times put the interests of clients first. Clients should be aware, however, that the receipt of any economic benefit by Selective or its associates in and of itself creates a potential conflict of interest and may influence the choice of brokers & custodians.

#### **Brokerage for Client Referrals**

The Firm receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### **Clients Directing Which Broker/Dealer/Custodian to Use**

The Firm will require clients to use a specific broker-dealer to execute transactions. Not all Investment Advisor Firms require this, and therefore clients may not get best execution.

#### ***B. Aggregating (Block) Trading for Multiple Client Accounts***

The Firm maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing The Firm the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

### **Item 13: Reviews of Accounts**

#### ***A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews***

Selective has three categories for reviews:

- 1) Spot Checks: At least quarterly the Chief Investment Officer (CIO) and/or the Chief Compliance Officer (CCO) choose a random assortment of accounts and review them to ensure the allocations and investments align with their stated investment policies and risk tolerances
- 2) Boardroom Updates: Every quarter the Firm releases a video updating clients on every holding within the Fund. This ensures clients have the most up-to-date information on the developments of investments
- 3) Client/Advisor Meetings: At least annually a Selective advisor reaches out to clients via phone, email, or text to schedule a meeting. This meeting could be done in person or over the phone. Alternatively, if the does not wish to meet, the advisor will make such a note in the client’s file.

#### ***B. Factors That Will Trigger a Non-Periodic Review of Client Accounts***

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

#### ***C. Content and Frequency of Regular Reports Provided to Clients***

Each client will receive at least quarterly from the custodian, a written report that details the client’s account including assets held and asset value which will come from the custodian. Additionally, each client will receive periodic reports, at least quarterly, from Selective related to investment performance, billing fees, and transaction history.

### **Item 14: Client Referrals & Other Compensation**

#### ***A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)***

The Firm does not receive any economic benefit, directly or indirectly from any third party for advice rendered to The Firm clients.

#### ***B. Compensation to Non – Advisory Personnel for Client Referrals***

The Firm expects from time-to-time to offer incentives for referrals to investment presentations. Compensation is not contingent upon an individual investing with The Firm, but rather, attending a specific event. These arrangements may create an incentive for a third-party or other existing client to refer prospective clients to The Firm even if the



third-party would otherwise not make the referral. A history of all compensation given for referrals is recorded and stored for review.

### **Item 15: Custody**

With written client authority, the Firm has limited custody of client's assets through direct fee deduction only. If the client chooses to have fees withdrawn directly from their account Selective would have constructive custody over that account and must have written authorization from the client to do so. Clients will receive all required account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Advisor is not affiliated with the custodian. The custodian does not supervise the advisor, its agents or activities.

### **Item 16: Investment Discretion**

For those client accounts where The Firm provides ongoing supervision, the client has given The Firm written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold, **including the Selective Opportunity Fund Family**. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides The Firm discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

### **Item 17: Voting Client Securities (Proxy Voting)**

The Firm will ask for and accept voting authority for client securities. The Firm will vote proxies on behalf of the clients. Upon receiving authority to vote client securities, The Firm will not accept client direction on how they wish to vote their individual securities. Exercising these proxy voting rights is important to successful investment management. The Firm recognizes its fiduciary responsibility to vote proxies solely in the client's best interest with the overall goal of maximizing the growth of our clients' assets. The Firm attempts to vote proxies that will further the underlying securities' long-term economic value. We consider each proxy proposal on its own merits, and we make an independent determination of the advisability of supporting or opposing management's position. If a conflict of interest were to be identified in voting proxies on behalf of a client, the CCO and COO will examine if the prescribed voting guidelines remain in the best interest of the client(s). If they do not The Firm will disclose the conflict to the clients and if appropriate, give the clients the opportunity to vote their proxies themselves. From time-to-time the Firm may refrain from voting proxies if the cost of voting exceeds the expected benefit to clients. If clients wish to see how The Firm has voted proxies for any individual security, they own or see

the policies and procedures for voting proxies they may request it at [info@selectivewm.com](mailto:info@selectivewm.com) or call 434-515-1517.

### **Item 18: Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Firm's financial condition. The Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.