

**Item 1 - Cover Page**

**Brochure**

**Form ADV Part 2A**

Wealth Dimensions Family Office, Inc.  
**CRD# 266787**

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**September 17, 2018**

This brochure provides information about the qualifications and business practices of Wealth Dimensions Family Office, Inc. If you have any questions about the contents of this brochure, please contact us at (513) 945-1030 or [DLoftus@wealthdimensions.com](mailto:DLoftus@wealthdimensions.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Wealth Dimensions Family Office, Inc. is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Wealth Dimensions Family Office, Inc. also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

**Item 2 - Material Changes**

This Brochure, dated September 17, 2018, was prepared in accordance with the SEC requirements, and contains the following material changes from Wealth Dimensions Family Office's 2018 annual amendment (filed on September 17, 2018).

- Effective March 2018, Patrick D. Hayes of Graydon Compliance Solutions, was appointed Chief Compliance Officer (CCO).

You may also obtain a copy of our Brochure by contacting Patrick D. Hayes, Chief Compliance Officer, by phone at 513-629-2763, or by email at [phayes@wealthdimensions.com](mailto:phayes@wealthdimensions.com).

Additional information about Wealth Dimensions Family Office is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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## **Item 4 - Advisory Business**

### General Information

Wealth Dimensions Family Office, Inc. ("WDFO") registered as an investment adviser in 2015, and provides family office services to its clients.

Thomas A. Curti, Douglas P. Loftus and are the Michael E. McCaw owners of WDFO. For more information on Messrs. Curti and Loftus, as well as other individuals who formulate investment advice, have direct contact with clients, or have discretionary authority over client accounts, please contact us to receive a copy of the WDFO Form ADV Part 2B brochure supplement.

As of June 30, 2018, WDFO managed \$345,807,462 on a discretionary basis, and no assets on a non-discretionary basis.

### **SERVICES PROVIDED**

WDFO provides family office services to high-net-worth clients as described below. Specific services to be provided will be identified in the written agreement executed between each client and WDFO.

At the outset of each client relationship, WDFO spends time with the client, asking questions, discussing the client's investment experience and financial circumstances, and broadly identifying major goals and service needs of the client. WDFO generally develops with each client:

- a financial outline for the client based on the client's financial circumstances and goals, and the client's risk tolerance level (the "Financial Profile" or "Profile"); and
- the client's investment objectives and guidelines (the "Investment Plan" or "Plan").

The Financial Profile is a reflection of the client's current financial picture and a look to the future goals of the client. The Investment Plan outlines the types of investments WDFO will make or in some cases recommend on behalf of the client to meet those goals. The Profile and the Plan are discussed regularly with each client, but are not necessarily written documents.

### Financial Planning

Financial Planning is essential to the high-net-worth individual or family. It generally includes advice that addresses many areas of a client's financial situation, such as estate planning, risk management, budgeting and cash flow controls, retirement planning, education funding, philanthropic initiatives, generational transfer of wealth, and investment portfolio design. Depending on a client's particular situation, financial planning may include some or all of the following:

- Gathering factual information concerning the client's personal and financial situation;
- Assisting the client in establishing financial goals and objectives;
- Analyzing the client's present situation and anticipated future activities in light of the client's financial goals and objectives;
- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio to help meet the goals and objectives of the client;

- Providing general estate planning advice (typically in the form of coordination with an estate-planning attorney; WDFO does not provide legal advice);
- Assessing risk and reviewing basic health, life and disability insurance needs; or
- Reviewing goals and objectives and measuring progress toward these goals.

The client is under no obligation to act upon any of the recommendations made by WDFO under a financial planning engagement and/or to engage the services of any recommended professional.

#### Family Governance and Generational Transfer Planning

An important aspect of managing wealth is coordination and communication among and between family members. As children grow up and marry, this becomes even more important. WDFO provides a neutral third party with an objective view to help manage this area.

#### Check-Writing and Bill-Pay Services

WDFO will manage the payment of ongoing expenses of various family members, businesses, and other entities as requested.

#### Philanthropy

Various family members may have disparate ideas towards charitable giving. WDFO will help develop a comprehensive family plan for giving, and then implement it.

#### Reporting Services

WDFO will provide the reports needed and requested by family members, including reports on illiquid assets and/or those that are not managed by WDFO.

#### Portfolio Management

As described above, at the beginning of a client relationship, WDFO meets with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by WDFO based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, WDFO will direct the management of the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, WDFO will have the authority to supervise and direct the portfolio without prior consultation with the client. Please see "Separate Account Managers" below for more information.

Notwithstanding the foregoing, clients may impose certain written restrictions on WDFO in the management of their investment portfolios, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. Each client should note, however, that restrictions imposed by a client may adversely affect the composition and performance of the client's investment portfolio. Each client should also note that his or her investment portfolio is treated individually by giving consideration to each purchase or sale for the client's account. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ, and clients should not expect that the composition or performance of their investment portfolios would necessarily be consistent with similar clients of WDFO.

### Separate Account Managers

Even when serving as the primary investment adviser for a client account, WDFO does not typically direct the day-to-day management of investments. Instead, it chooses other investment advisers (each a “Manager”) to direct the investments of various portions of the overall investment portfolio as appropriate. WDFO’s affiliate, Wealth Dimensions Group, Ltd., also a registered investment adviser, is one of the Managers that WDFO utilizes under a sub-advisory agreement. This creates a conflict of interest due to WDFO’s discretion in determining the asset allocation among all Managers, including its affiliate.

Having access to various Managers offers a wide variety of manager styles, and offers clients the opportunity to utilize more than one Manager if necessary to meet the needs and investment objectives of the client. WDFO will select or recommend the Manager(s) it deems most appropriate for the client. Factors that WDFO considers in recommending/selecting Managers generally includes but is not limited to the client’s stated investment objective(s), management style, performance, risk level, reputation, financial strength, reporting, pricing, and research.

The selected Manager(s) will generally be granted discretionary trading authority for the relevant portions of the client’s portfolio. WDFO retains the authority to terminate the Manager’s relationship or to add new Managers without specific client consent. Fees paid to such Manager(s), including WDFO’s affiliate, are separate from and in addition to the fee assessed by WDFO.

In any case, with respect to assets managed by a Manager, WDFO’s role will be to monitor the overall financial situation of the client, to monitor the investment approach and performance of the Manager(s), and to assist the client in understanding the investments of the portfolio.

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

### General Fee Information

Fees paid to WDFO are exclusive of all custodial and transaction costs paid to the client’s custodian, brokers or other third party consultants. Please see **Item 12 – Brokerage Practices** for additional information. Fees paid to WDFO are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund’s prospectus or offering materials). The client should review all fees charged by funds, brokers, WDFO and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Fees are generally charged on the basis of a percentage of the total net worth of the client, or as a percentage of the value of the managed portfolio. Fees are individually negotiated and agreed upon at the beginning of the relationship.

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With client authorization, unless other arrangements are made fees are normally debited directly from client account(s).

Either WDFO or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed, and any fees due to WDFO from the client will be invoiced or deducted from the client's account prior to termination.

#### Separate Account Manager Fees

Manager fees will be charged in addition to WDFO's fee, and will be detailed in the Management Agreement signed by the client.

#### Other Compensation

Certain Principals and employees of WDFO maintain licenses with various life and disability insurance companies. In their individual capacity (and not as WDFO representatives), these individuals may recommend the purchase of insurance products under circumstances where they would be entitled to receive a commission or other compensation in the transaction. In all such circumstances, however, the client will be notified in advance of the transaction that Principals and employees may receive a commission or other compensation..

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

WDFO does not have any performance-based fee arrangements. "Side by Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because WDFO has no performance-based fee accounts, it has no side-by-side management.

### **Item 7 - Types of Clients**

WDFO serves high-net-worth individuals and their related entities. WDFO does not generally impose a minimum portfolio value or a minimum annual fee for its services.

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

#### Methods of Analysis

In accordance with the Investment Plan, WDFO will select Separate Account Managers. Such Managers are evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, management team, and other factors.

#### Investment Strategies:

WDFO's strategic approach is to invest each portfolio in accordance with the Plan that has been developed specifically for each client. This means that the following strategies may be used in varying combinations over time for a given client, depending upon the client's individual circumstances and the Manager(s) selected.

Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Margin Transactions – a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Options Trading/Writing: a securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the exercise of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

#### Risk of Loss

While WDFO seeks to diversify clients' investment portfolios across various asset classes consistent with their Investment Plans in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While WDFO recommends one or more Managers based on WDFO's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that a Manager allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that WDFO's specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, a Manager(s) may invest client portfolios in mutual funds, ETFs, and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Risks Related to Alternative Investment Vehicles.* From time to time and as appropriate, Manager(s) may invest a portion of a client's portfolio in alternative vehicles. The value of client portfolios will be based in part on the value of alternative investment vehicles in which they are invested, the success of each of which will depend heavily upon the efforts of their respective Managers. When the investment objectives and strategies of a Manager are out of favor in the market or a Manager makes unsuccessful investment decisions, the alternative investment vehicles managed by the Manager may lose money. A client account may lose a substantial percentage of its value if the



investment objectives and strategies of many or most of the alternative investment vehicles in which it is invested are out of favor at the same time, or many or most of the Managers make unsuccessful investment decisions at the same time.

*Equity Market Risks.* Manager(s) will generally invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* Manager(s) may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Foreign Securities Risks.* Manager(s) may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

*Margin Risk.* WDFO does not use margin as an investment strategies. However, clients may elect to borrow funds against their investment portfolio. When securities are purchased, they may be paid for in full or the client may borrow part of the purchase price from the account custodian. If a client borrows part of the purchase price, the client is engaging in margin transactions and there is risk involved with this. The securities held in a margin account are collateral for the custodian that loaned the client money. If those securities decline in value, then the value of the collateral supporting the client's loan also declines. As a result, the brokerage firm is required to take action in order to maintain the necessary level of equity in the client's account. The brokerage firm may issue a margin call and/or sell other assets in the client's account to accomplish this. It is important that clients fully understand the risks involved in trading securities on margin, including but not limited to:

- It is possible to lose more funds than is deposited into a margin account;
- The account custodian can force the sale of assets in the account;
- The account custodian can sell assets in the account without contacting the client first;
- The account holder is not entitled to choose which assets in a margin account may be sold to meet a margin call; The account custodian can increase its "house" maintenance margin requirements at any time without advance written notice; and

- The accountholder is not entitled to an extension of time on a margin call.

*Derivatives Risk:* A Manager may, for certain clients that qualify as “accredited investors” and for whom it is appropriate, invest portions of the client assets in derivative financial instruments (“derivatives”) including, without limitation, futures, options, interest rate swaps, forward currency contracts and credit derivatives such as credit default swaps. A small investment in derivatives could have a potentially large impact on an investor’s performance. The use of derivatives involves risks different from, or possibly greater than, the risks associated with investing directly in the underlying assets. These risks include: (1) counterparty risk; (2) interest rate risk; (3) basis risk; (4) settlement risk; (5) legal risk; (6) operational risk; and (7) market risk. Counterparty risk is the risk that one of the Fund’s counterparties might default on its obligation to pay or perform generally on its obligations. Interest rate risk is the general risk associated with movements in interest rates. Basis risk is the risk associated with the relative movements in two (related) rates or prices. Settlement risk is the risk that a settlement in a transfer system does not take place as expected. Legal risk is the risk that a transaction proves unenforceable in law or because it has been inadequately documented. Operational risk is the risk of unexpected losses arising from deficiencies in a firm’s management information, support and control systems and procedures. Market risk is the risk of potential adverse changes in the value of financial instruments resulting from changes in market prices, such as interest, commodity and currency rate movements. In addition, derivatives can be highly volatile, illiquid and difficult to value.

*Options Risk:* A small investment in options could have a potentially large impact on an investor’s performance. The use of options involves risks different from, or possibly greater than, the risks associated with investing directly in the underlying assets. Derivatives can be highly volatile, illiquid and difficult to value, and there is the risk that a hedging technique will fail if changes in the value of a derivative held by an investor do not correlate with the securities being hedged.

## **Item 9 - Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client’s evaluation of WDFO or the integrity of WDFO’s management. WDFO has no disciplinary events to report.

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

As described in **Item 4 - Advisory Business**, WDFO selects Managers to actively manage client portfolios. One of the Managers frequently used is WDFO’s affiliated advisory firm (Wealth Dimensions Group, Ltd.). WDFO has retained Wealth Dimensions Group, Ltd. as a sub-adviser. Depending upon the arrangements made with the client, fees assessed by WDFO and Wealth Dimensions Group, Ltd. may be combined. Such details will be outlined in the written agreement between WDFO and the client.

WDFO also selects other Managers, unaffiliated with WDFO, each of which assesses separate fees with no portion of their fee paid to WDFO.

All asset allocation decisions are based on the risk tolerance and Investment Plan of the individual client. WDFO recognizes its fiduciary duty to act in the best interest of each client, including in the selection of Managers. Clients are apprised of the relationship between WDFO and its affiliate.

Doug Loftus and Thomas Curti, each a Principal Owner of WDFO, are also owners of Professional Practice Advisors, LLC ("PPA"), a practice management consulting firm for dentists and other medical professionals. Because WDFO and PPA are under common ownership, there is a benefit for the firms to share clients. Although the two firms may each recommend the other to clients, there is no requirement that any client of one firm use the services of the other. The services of WDFO and PPA are separate and distinct from one another and provided for separate and typical compensation. Neither firm pays a referral fee to the other for recommending a client.

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

### Code of Ethics and Personal Trading

WDFO has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. WDFO's Code has several goals. First, the Code is designed to assist WDFO in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, WDFO owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with WDFO (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for WDFO's associated persons. Under the Code's Professional Standards, WDFO expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, WDFO associated persons are not to take inappropriate advantage of their positions in relation to WDFO clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time WDFO's associated persons may invest in the same securities recommended to clients. Under its Code, WDFO has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

### Participation or Interest in Client Transactions

As outlined above, WDFO has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, WDFO's goal is to place client interests first. WDFO shares associated persons with its affiliated advisory firm, and coordinates personal securities trading controls and reporting requirements with the affiliate for the protection of client interests. Consistent with the foregoing, WDFO maintains policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with client transactions. If a WDFO associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

As indicated under Item 5 above, certain Principals and employees of WDFO maintain licenses with various life and disability insurance companies. In their individual capacity (and not as WDFO representatives), these persons may recommend the purchase of insurance products under circumstances

where they would be entitled to receive a commission or other compensation in the transaction. In all such circumstances, however, the client will be notified in advance of the transaction that Principals and other employees may receive a commission or other compensation.

## **Item 12 - Brokerage Practices**

### Best Execution and Benefits of Brokerage Selection

As described earlier, WDFO typically hires Separate Account Managers to manage the day-to-day trading activities of its clients' accounts. When considering various Managers, WDFO reviews the "best execution" policy of each Manager. Best execution is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, WDFO may use Managers with brokerage arrangements that do not result in the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of a Manager's clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

WDFO participates in the Fidelity Family Office Services ("FFOS") program. While there is no direct link between the investment advice provided by WDFO and its participation in the FFOS program, WDFO receives certain economic benefits from the FFOS program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of WDFO's fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of WDFO's accounts, including accounts not held at Fidelity. Fidelity may also make available to WDFO other services intended to help WDFO manage and further develop its business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Fidelity may make available, arrange and/or pay for these types of services to be rendered to WDFO by independent third parties. Fidelity may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to WDFO, and/or Fidelity may pay for travel expenses relating to participation in such training. Finally, participation in the FFOS program provides WDFO with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the FFOS program do not necessarily depend upon the proportion of transactions directed to Fidelity. The benefits are received by WDFO, in part because of commission revenue generated for Fidelity by WDFO's clients. This means that the investment activity in client accounts is beneficial to WDFO, because Fidelity does not assess a fee to WDFO for these services. This creates an incentive for WDFO to continue to recommend Fidelity to its clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, WDFO believes that Fidelity provides an excellent combination of these services resulting in a better overall value to WDFO clients. These services are not soft dollar arrangements, but are part of the institutional platform offered by Fidelity.

### Directed Brokerage

Clients may direct WDFO to use Managers that utilize a particular broker for custodial or transaction services on behalf of the client's portfolio. In directed brokerage arrangements, to the extent possible, WDFO will assist the client in negotiating the commission rates and other fees to be paid to the broker. However, a client who directs brokerage should consider whether such designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to the client.

The arrangement that WDFO has with Fidelity is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, the client acknowledges that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing WDFO to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with WDFO that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

#### Aggregated Trade Policy

WDFO does not typically place trades on behalf of client accounts. This activity is generally performed by the sub-advisors WDFO uses to service client accounts.

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

Client portfolios are reviewed at least quarterly, but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by WDFO. These factors generally include, but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. Tom Curti and Doug Loftus review accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, WDFO provides at least a quarterly report for each managed portfolio. This written report normally includes a summary of portfolio holdings and performance results. Additional reports are available at the request of the client.

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

As noted above, WDFO receives an economic benefit from Fidelity in the form of support products and services it makes available to WDFO and other independent investment advisors that have their clients maintain accounts at Fidelity. These products and services, how they benefit our firm, and the related conflicts of interest are described in Item 12 - Brokerage Practices. The availability of Fidelity's products and services to WDFO is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither Fidelity nor any other party is paid to refer clients to WDFO.

## **Item 15 - Custody**

It is the custodian's responsibility to provide clients with confirmations of trading activity, tax forms and at least quarterly account statements. Clients are advised to review this information carefully, and to notify WDFO of any questions or concerns. Clients are also asked to promptly notify WDFO if the custodian fails to provide statements on each account held.

From time to time and in accordance with WDFO's agreement with clients, WDFO will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times there may be small differences due to the timing of dividend reporting, pending trades or other similar issues.

## **Item 16 - Investment Discretion**

As described above under ***Item 4 - Advisory Business***, WDFO manages portfolios on a discretionary basis. This means that after an Investment Plan is developed for the client's investment portfolio, WDFO will execute that plan without specific consent from the client for each transaction. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving WDFO the authority to carry out various activities in the account, generally including the following: trade execution; the ability to request checks on behalf of the client; and, the withdrawal of advisory fees directly from the account. WDFO then directs investment of the client's portfolio using its discretionary authority. The client may limit the terms of the LPOA to the extent consistent with the client's investment advisory agreement with WDFO and the requirements of the client's custodian. The discretionary relationship is further described in the agreement between WDFO and the client.

Certain assets may be included in reporting or under general oversight by WDFO, while not managed on a discretionary basis. In some of these cases, the client may execute an LPOA, which allows WDFO to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the investment advisory agreement between WDFO and the client, WDFO does not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. As with discretionary accounts, clients may limit the terms of the LPOA, subject to WDFO's agreement with the client and the requirements of the client's custodian.

**Item 17 - Voting Client Securities**

As a policy and in accordance with WDFO's client agreement, WDFO does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may contact WDFO with questions relating to proxy procedures and proposals; however, WDFO generally does not research particular proxy proposals.

**Item 18 - Financial Information**

WDFO does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure with respect to this item.