



## Wrap Fee Program Brochure Form ADV 2A -Appendix 1

### Item 1 - Cover Page

Wallace Hart LLC  
d/b/a  
Wallace Hart Capital Management  
**CRD# 285981**

1792 Alysheba Way, Suite 390  
Lexington, Kentucky 40509

859-300-3030

**February 14, 2019**

This brochure provides information about the qualifications and business practices of Wallace Hart LLC, d/b/a Wallace HartCapital Management, ("Wallace Hart"). If you have any questions about the contents of this brochure, please contact us at 859-300-3030 or [jeremy@wallacehart.com](mailto:jeremy@wallacehart.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state authority.

Wallace Hart 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 Wallace Hart is also available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).



## Item 2 - Material Changes

This Wrap Fee Program Brochure (the "Wrap Brochure") is a document that Wallace Hart provides to clients of the Wallace Hart Wrap Program as required by SEC Rules.

The purpose of Item 2 of the Wrap Brochure is to provide clients with a summary of new and/or updated information that is contained in the remainder of the Wrap Brochure. There have been no material changes to this Wrap Brochure since the previous annual amendment filing on March 26, 2018.

Wallace Hart will provide clients with a new Wrap Brochure as necessary based on changes, new information, or at a client's request, at any time, without charge.



### Item 3 - Table of Contents

Page

Item 1 - Cover Page .....	1
Item 2 - Material Changes.....	2
Item 3 - Table of Contents.....	3
Item 4 - Services, Fees and Compensation .....	4
Item 5 - Account Requirements and Types of Clients.....	5
Item 6 - Portfolio Manager Selection and Evaluation.....	5
Item 7 - Client Information Provided to Portfolio Managers.....	5
Item 8 - Client Contact with Portfolio Managers .....	5
Item 9 - Additional Information .....	5
Item 10 - Requirements for State-Registered Advisers.....	5



#### Item 4 - Services, Fees and Compensation

Wallace Hart was formed in 2016 and provides financial planning services and portfolio management to its clients. Such services may be offered through the "Wallace Hart Wrap Program" or the "Program," which has been designed to simplify the payment of management fees and brokerage expenses.

Jeremy Wallace and M. Andrew Hart are the principal owners of Wallace Hart. Mr. Hart is a minority owner of Wallace Hart. Please see Part 2B Brochures for more information on Mr. Wallace and Mr. Hart, as well as others who formulate investment advice and have direct contact with clients, or have discretionary authority over client accounts.

#### Portfolio Management Services

At the beginning of a client relationship, Wallace Hart 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 Wallace Hart based on updates to the client's financial or other circumstances.

To implement the client's Investment Plan, Wallace Hart will manage the client's investment portfolio on a discretionary basis. As a discretionary investment adviser, Wallace Hart will have the authority to supervise and direct the portfolio without prior consultation with the client.

Notwithstanding the foregoing, clients may impose certain written restrictions on Wallace Hart 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 Wallace Hart.

#### Financial Planning

Wallace Hart offers limited financial planning services to those clients in need of such service in conjunction with portfolio management services. Wallace Hart's limited financial planning services normally address areas such as general cash flow planning, retirement planning, and insurance analysis. The goal of this service is to assess the financial circumstances of the client in order to more effectively develop the client's Investment Plan.

#### General Fee Information

Wallace Hart generally offers all clients the opportunity to participate in the Wallace Hart Wrap Program. Fees paid by clients to participate in the Wallace Hart Wrap Program generally include brokerage expenses (*i.e.*, commissions, ticket charges, etc.) as well as the management fee paid to Wallace Hart. Under the all-inclusive billing alternative, Wallace Hart will assess one client fee that captures the management, brokerage and administrative portions collectively. Please see Part 2A, *Item 5 – Fees and Compensation* for Wallace Hart's fee schedule and other billing information.

Fees paid to Wallace Hart are exclusive of 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). Clients may pay certain fees in addition to the fees of the Wallace Hart Wrap Program, such as margin interest, check fees, trade-away fees, odd lot differentials and other similar types of fees. Any portions of the Wallace Hart Wrap Program fees that Wallace Hart does not pay to third parties in connection with transaction and execution expenses are retained by Wallace Hart. Because of this, Wallace Hart may have a disincentive to trade securities in client accounts as Wallace Hart's overall compensation under this arrangement may be greater than it is for clients that do not participate in the Wallace Hart Wrap Program. However, for accounts under \$900,000, Wallace Hart generally agrees to pay a flat fee for all transactions to mitigate against this conflict of interest. Wallace Hart, in its sole discretion, may establish a minimum portfolio asset value size requirement for participation in the Wallace Hart Wrap Program.

The client should review all fees charged by funds, Wallace Hart and others to fully understand the total amount of fees paid by the client for investment and financial-related services. Clients participating in the Wallace Hart Wrap Program may pay higher or lower fees than clients purchasing such services separately, depending on the cost of services if provided separately and the level of trading in a particular client's account.

#### Wrap Program Fee Information

Please see *Item 5 - Fees and Compensation* of ADV Part 2A for more information regarding the Wallace Hart Wrap Program fees.

#### Item 5 - Account Requirements and Types of Clients

Wallace Hart serves individuals, pension and profit-sharing plans, corporations, trusts, estates and charitable organizations.

#### Item 6 - Portfolio Manager Selection and Evaluation

The Wallace Hart Wrap Program was designed to simplify for clients the payment of management fees and brokerage expenses. The Program does not select advisers in addition to Wallace Hart, which is the only Portfolio Manager for the Program. Please refer to additional information found in the following Items of ADV Part 2A, which accompanies this Wrap Brochure: *Item 4 – Advisory Business; Item 6 – Performance-Based Fees and Side-By-Side Management; Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss; and Item 17 – Voting Client Securities.*

#### Item 7 - Client Information Provided to Portfolio Managers

Wallace Hart is the only portfolio manager under the Wallace Hart Wrap Program. Wallace Hart may utilize sub-advisers at its discretion.

#### Item 8 - Client Contact with Portfolio Managers

Wallace Hart is the only direct portfolio manager under the Wallace Hart Wrap Program. No restrictions are placed on client's ability to contact or consult with Wallace Hart.

#### Item 9 - Additional Information

Neither Wallace Hart nor its Management Persons have any disciplinary disclosure required. Please see ADV Part 2A for more information in the following areas: *Item 10 - Other Financial Industry Activities and Affiliations, Item 11 - Code of Ethics, Item 13 - Review of Accounts, Item 14 - Client Referrals and Other Compensation, and Item 18 - Financial Information.*

#### Item 10 - Requirements for State-Registered Advisers

Relevant information regarding the principal executive officers and management persons of Wallace Hart is provided elsewhere in this Form ADV (please see Part 2B). Other than this, no disclosure is required under this item.