

Item 1: Cover Page



(Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of Wisdom Index Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (972) 931-0063 or by email at compliance@wisdomindex.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Wisdom Index Advisors, LLC is a Registered Investment Advisor. The registration of an Investment Adviser does not imply any level of skill or training. An Adviser's oral and written communications provide you with information that you may use to determine whether to hire or retain them.

Additional information about Wisdom Index Advisors is available on the SEC's website at www.adviserinfo.sec.gov.

Version Date: 3/22/2024

102 S. Main Street
Prosper, TX 75078
Phone: (972) 931-0063
Fax: (214) 853-4224
www.wisdomindex.com
compliance@wisdomindex.com




Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of Wisdom Index Advisors Form ADV Part 2A, also known as the Firm Brochure. The last annual update to this document was made on March 27th, 2023.

Material Changes since the Last Update

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide an updated Firm Brochure in narrative "plain English" format that specifies mandatory sections and organization. This brochure has been updated to follow these rules. (See Item 4: A). This form has several material changes to the following items:

-  Item 4: Retirement Plan Services - New Language for Prohibited Transaction Rule 2020 2.0
-  Item 5: New Client Minimum is \$1,000,0000
-  Item 12: Adding Schwab & Co, Axos Advisors, and removing TD Ameritrade.

Brochure Availability

Whenever you would like to receive a complete copy of our Firm Brochure, please get in touch with us at (972) 931-0063 or by email at: mike@wisdomindex.com or compliance@wisdomindex.com.

Contents

Item 1: Cover Page.....	1
Item 2: Material Changes	2
Annual Update	2
Material Changes since the Last Update.....	2
Brochure Availability	2
Item 3: Table of Contents	3
Item 4: Advisory Business	6
A. Description of the Advisory Firm	6
Principal Owners.....	6
B. Types of Advisory Services.....	6
Investment Management Services	6
Advanced Planning Services – Wisdom Index®	6
Retirement Plan Services.....	7
C. Tailored Relationships and Client Imposed Restrictions	7
D. Wrap Fee Programs	7
E. Assets Under Management.....	7
Item 5: Fees and Compensation.....	8
A. Advisory Services Compensation Description	8
B. Payment of Fees	8
C. Third Party/Custodian Fees.....	9
D. Prepayment of Fees	9
E. Outside Compensation for Sale of Securities to Clients	9

Item 6: Performance-Based Fees	9
Item 7: Types of Clients	10
A. Description of Clients.....	10
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	10
A. Methods of Analysis	10
B. Investment Strategies	10
C. Risk of Specific Securities	11
Item 9: Disciplinary Information	12
A. Legal and Disciplinary	12
Item 10: Other Financial Industry Activities and Affiliations	12
A. Registration as a Broker/Dealer or Broker/Dealer Representative.	12
B. Registration as a Futures Commission Merchant, Commodity Pool Operator/Trading Advisor.	12
C. Relationships Material to this Advisory Business and Possible Conflicts of Interests	12
D. Selection of Other Advisors.....	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
A. Code of Ethics	12
B. Recommendations Involving Material Financial Interests	13
C. Investing in Same Securities as Clients	13
D. Trading Securities At/Around the Same Time as Clients' Securities.....	13
Item 12: Brokerage Practices	13
A. Factors Considered in Selecting Custodians and/or Broker/Dealers.....	13
B. Trade Aggregation.....	14
Item 13: Review of Accounts	14
A. Periodic Review of Client Accounts/Financial Plans	14
B. Review Triggers.....	14
C. Regular Reports.....	14

Item 14: Client Referrals and Other Compensation	14
A. Economic Benefits Provided by Third Parties	14
B. Referrals Out	14
Item 15: Custody	15
Item 16: Investment Discretion.....	15
Item 17: Voting Client Securities	15
A. Proxy Votes	15
B. Proxy Authority	15
Item 18: Financial Information	16
A. Financial Condition	16
B. Discretionary Authority or Custody.....	16
C. Bankruptcy Petitions in Previous Ten Years	16
Privacy Policy Statement	17
A. Our Promise.....	17
B. Information We Collect.....	17
C. Safeguards.....	17
D. Other Advisors	17
E. Updates.....	17
F. Disclosures.....	17

Item 4: Advisory Business

A. Description of the Advisory Firm

Wisdom Index Advisors, LLC (hereinafter "Wisdom Index Advisors", "Wisdom Index" or "WI") is a privately-owned SEC registered investment advisor that offers personalized wealth management and investment consulting solutions for select individuals, corporations, trusts, pension and profit-sharing plans, estates, charitable organizations and small businesses.

WI was founded on July 27, 2004 and is currently registered with the Securities Exchange Commission.

Principal Owners




Michael J. Davidson is the only firm principal and is a 100% stockholder.




B. Types of Advisory Services

WI offers wealth management solutions to customers (hereinafter "Clients" or "Client") by combining investment management services and advanced planning services.

Investment Management Services

WI implements portfolio and investment management services based upon Nobel-prize winning academic research utilizing primarily market-based investment strategies and long-term holding periods. Differentiated from traditional investment management where the primary objective is to beat the market by stock picking or market timing, WI directs Client investments applying the following financial principles:

-  Markets Work Efficiently
-  Risk and Expected Return are Related
-  Market Dimensions Have Different Risk Factors

-  Asset Allocation Determines Risk & Expected Return
-  Investing Requires Time
-  Investing Requires Rebalancing

Investment management services are facilitated through the creation and implementation of a Wisdom Index and Investment Policy Statement (IPS). The IPS includes information about the Client including values, accomplishments, key relationships, feelings about risk, balance sheet information, other advisors and financial goals. The IPS is a key component to the overall plan and helps to communicate and implement the investment strategy.

WI analysis methods utilize resources from commercially available software packages, market rating services, general market data and financial publications. WI also benefits from the economic expertise and investment knowledge of economists affiliated with Dimensional Fund Advisors (DFA). We approach client account management with a holistic view, utilizing mutual funds, exchange traded funds and individual fixed income securities to provide diversification. Wisdom Index may also recommend small allocations to registered interval funds to improve client diversification.

Advanced Planning Services – Wisdom Index®









On more than an occasional basis, WI furnishes advice to Clients on matters not involving securities, such as financial planning matters, taxation concerns, life insurance, retirement planning, college planning, debt/credit planning and stewardship consulting. Typically, these areas are covered in the creation of the Client (IPS) but may also be addressed in the development of a client Wisdom Index®. The Wisdom Index® may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations.

The first Client meeting, called a Discovery Meeting, is free of charge and is considered an exploratory interview to determine the extent to which financial planning and investment management may be beneficial to the Client. The next step is the development of a draft Wisdom Index® and IPS. WI will work closely with the Client and their other advisors to implement the necessary next steps.

Retirement Plan Services

WI offers services to qualified retirement plans utilizing the same investment management approach for individual clients. Typically, this involves analyzing current plan investments, building investment policy statements and creating model portfolios for plan participants. WI generally serves in the capacity of a 3(38) "Investment Manager" to these plans and is a fiduciary under ERISA with respect to investment management services and advice provided to ERISA Clients, including plan participants.

Prohibited transaction exemption ("PTE") 2020-02 Improving Investment Advice for Workers and Retirees is a new prohibited transaction exemption that falls under ERISA, and the code for investment advice fiduciaries with respect to ERISA covered employee benefit plans, individual retirement accounts, and health saving accounts. It is intended to ensure that the investment advice fiduciaries can be granted exemption from the DOL 2020 investment advice rule so that they can offer and be compensated for recommendations that are in the best interest of the retirement investors. PTE applies to registered investment advisers, broker-dealers, banks, insurance companies, and their employees and agents, plan participants, individual retirement account owners, and health saving accounts owners. Without the exemption, these institutions, the employees, and agents cannot be compensated for their investment advice because to do so would be a conflict of interest. Wisdom Index seeks the following standards when providing IRA rollovers:

-  Offer advice that is in the Retirement Investor's best interest.
-  Charge reasonable compensation for services.
-  Seek to obtain the best execution of investment transactions; and
-  Acknowledge fiduciary status under ERISA with respect to investment advice rendered to Retirement Investors.
-  Provide a description of the services provided and disclosure of material conflicts of interest.
-  With respect to rollovers only, provide an explanation of the rationale as to why the recommendation is in the best interest of the Retirement Investor.
-  Include a consideration of alternatives.
-  Address fees associated with both the plan and the IRA;

C. Tailored Relationships and Client Imposed Restrictions

Client goals and objectives are documented in a custom Client profile and stored in our Client relationship management system. Custom Investment Policy Statements contain stated goals, values, feelings about risk and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

D. Wrap Fee Programs

WI does not participate in any wrap fee programs.

E. Assets Under Management

As of 12/31/2023, WI manages approximately **\$180,307,263** in assets on a discretionary basis, and **\$0** is managed on a non-discretionary basis. A discretionary basis includes the Client authorizing WI to manage Client accounts within the chosen investment strategy; therefore, WI is responsible for determining which trades to make.

Item 5: Fees and Compensation

A. Advisory Services Compensation Description

Investment Advisory Services Fees

WI manages Client accounts on a discretionary basis, with limited authority to make Client trades and deduct advisory fees. Fees are calculated based upon the following tiered and blended annual schedule but maybe be negotiated on a case-by-case basis:

	Managed Assets*	Annual Fee**
First \$500,000	\$0 - \$499,999	1.0 %
Next \$500,000	\$500,000—\$999,999	0.9 %
Next \$500,000	\$1,000,000—\$1,499,999	0.8 %
Next \$500,000	\$1,500,000—\$1,999,999	0.7 %
Next \$3,000,000	\$2,000,000—\$5,000,000	0.5 %
	\$5,000,000—and Up	Negotiable

Client fees are calculated on the gross value of Client account(s) under management at the end of the month and are debited quarterly or monthly, at the beginning of each quarter or month. Billing is generally done monthly in advance. IN ALL CASES, the Client can terminate the agreement at any time, for any reason, and any prepaid fees will be refunded on a pro-rated basis. For refund of prorated fees, WI will need to have written and signed authorization from Client that agreement is terminated.

* WI desires new Client relationships be greater than \$1,000,000. Client relationships less than \$1,000,000 will be evaluated on a case-by-case basis.

** Fees are calculated on the tiered and blended schedule of managed assets and are debited quarterly or monthly, in advance. For example, the First \$500,000 is charged at 1% and the next \$500,000 is charged at 0.9%, etc.

Advanced Planning Fees

In addition to asset-based fees, WI may charge hourly fees for the development of wealth management plans, written financial plans, or consultations on an hourly basis not to exceed \$250/hour. These fees are negotiable and agreed to in writing by the Client.

B. Payment of Fees

Investment management fees are generally withdrawn directly from Client accounts with written Client authorization monthly or quarterly, in advance. The Client must consent in advance to direct debiting of their investment account. Client accounts are valued on the last day of the month or quarter.

If the account is a qualified plan for a business and the business would like to pay fees directly, WI will send an invoice to the business either monthly or quarterly.

Advanced planning fees are paid by the Client after services have been delivered.

C. Third Party/Custodian Fees

Custodians may charge transaction fees on purchases or sales of stocks, bonds, certain mutual funds and exchange-traded funds. Clients are responsible for the payment of all third-party fees. These fees are separate and distinct from fees charged by WI. Currently, Charles Schwab charges \$0.00 for Equity and Exchange Traded Fund trades, \$9.99 for Dimensional Mutual Fund Trades and \$49.99 for Vanguard Mutual Fund trades. Please see Item 12 of this brochure regarding broker/custodian. Wisdom Index also has a custodial relationship with Axos Advisor Services, who charges an asset-based fee 0.02% for unlimited trading.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.20 means that the mutual fund company charges 0.2% for their services. These fees are in addition to the fees paid by Clients to WI.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted. Wisdom Index Advisors recommends that Clients read all investment prospectuses for investment details.

D. Prepayment of Fees

WI generally collects fees in advance. Should a Client decide to terminate agreement with WI, fees will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. WI will require a notification in writing from Client to terminate agreement so that fees can be refunded.

In addition, WI reserves the right to terminate any Client agreement where a Client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate or if WI believes Client might be better served with a different advisor.

E. Outside Compensation for Sale of Securities to Clients

Neither WI nor its supervised persons accepts any compensation for the sale of securities or investment products, including asset-based sales charges or services fees from the sale of mutual funds. Accepting outside compensation for investments or securities provides a conflict of interest.

Clients may have the option to purchase investment products that we recommend through other brokers or agents unaffiliated with WI. WI will disclose any conflict of interest with a Client in writing.

Item 6: Performance-Based Fees

WI does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

A. Description of Clients


WI generally provides investment advice and advanced planning to the following types of Clients:


 Individuals

 Trusts

 Charities/Not for Profits

 High Net Worth Individuals

 Profit Sharing & Pension Plans

 Corporations/Estate

Account Minimums

Typically, the minimum account size is \$1,000,000 of assets under management, which equates to an annual fee of \$9,500.

Generally, WI will require new Client accounts to be greater than \$1,000,000. Client account values less than \$1,000,000 will be evaluated on a case-by-case basis.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

WI analysis methods utilize resources from commercially available software packages, market rating services, general market data and financial publications. WI also benefits from the economic expertise and investment knowledge of economists affiliated with Dimensional Fund Advisors (DFA).

B. Investment Strategies

Markets throughout the world have historically rewarded investors for the capital they supply. Companies compete with each other for investment capital, while investors compete with each other to find the most attractive returns for their capital. This fierce competition helps to drive prices to fair value or towards price equilibrium.

Security prices change every day as they incorporate new information about changes in expectations and opinions of all market participants. Because the current price of an individual security reflects all available information, WI believes the current price is typically the best approximation of actual value.

Traditional investment management tries to take advantage of current pricing "mistakes" by speculating on future prices. While often a costly exercise for the traditional market investor, this is great news for the long-term investor. It means that prices for public securities are fair and that persistent differences in average returns are explained by differences in average risk.

WI rejects speculation, forecasting and guessing. Instead, we focus on understanding where risk comes from and continually monitoring how much to take. In order to have real expected returns, investors must take real risk. Risk is the possibility that an investor may lose money.

In theory, risk-free investments do exist. For US investors, T-bills (1-month or 3-month) are commonly used to benchmark these risk-free returns. Although T-bills are very conservative investments, in practice, they do actually carry some investment risk. ***Investing in anything that has an expected return greater than T-bills assumes a real investment risk.***

When investing in equities (stocks), there are many risks investors should avoid, but the following are three risk factors that investors should consider:

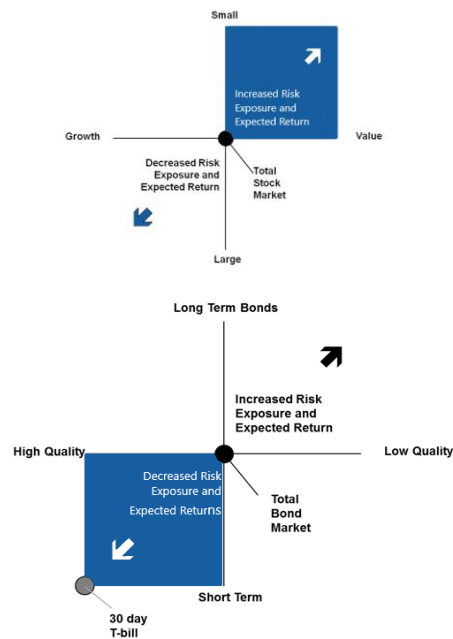
- ▮ **Market Risk** – Equity/stock markets are riskier than credit markets (bonds); therefore, stocks have greater expected returns than bonds.
- ▮ **Size Risk** – Smaller company stocks are riskier than larger companies; therefore, small company stocks have higher expected returns than large company stocks.
- ▮ **Price Risk** – Growth stocks have a higher price per share compared to value stocks relative to book value or earnings. Investors are generally willing to pay more per share for companies that are more established or “healthy”. Investing in lower priced stocks generally provides greater upside compensation as these companies’ prices reflect higher underlying risk.

WI uses asset-class funds, index funds and interval funds to build global equity portfolios to capture these risks and expected returns. As with equities, the risk and expected return of fixed income securities are also related. Understanding this relationship enables investors to plan the total risk/return profile of their Portfolio. The two primary risk factors that we consider when looking at fixed income are:

- ▮ **Maturity** – Longer-term bonds are riskier than shorter-term bonds. They are more sensitive to changes in interest rates.
- ▮ **Default** – Bonds with lower credit quality are riskier than bonds with higher credit quality.

WI believes that increasing bond portfolio durations generally provides smaller incremental returns with higher incremental risk.

WI uses asset-class funds and index funds to build global fixed income portfolios with a focus on shorter-term, high-quality (investment grade) instruments. Generally, the aggregate duration is less than five years.



C. Risk of Specific Securities


WI builds globally diversified equity and fixed income portfolios that hold over 14,000 positions invested in over 40 countries. When investing in globally diverse portfolios, Clients will be subject to the following risks.

- ▮ **Financial Risk:** which is the risk that the companies we recommend to you perform poorly, which affects the price of your investment.
- ▮ **Market Risk:** which is the risk that the stock market will decline, decreasing the value of the securities we recommend to you with it.
- ▮ **Inflation Risk:** which is the risk that the rate of price increases in the economy deteriorates the returns associated with the stock.
- ▮ **Political and Governmental Risk:** which is the risk that the value of your investment will be affected by the introduction of new laws or regulations.
- ▮ **Interest Rate Risk:** which is the risk that the value of the investments we

recommend to you will fall if interest rates rise.

- ▮ **Call Risk:** which is the risk that your investment will be called or purchased back from you when conditions are favorable to the bond issuer and unfavorable to you.
- ▮ **Default Risk:** which is the risk that the issuer is unable to pay the contractual interest or principal on the investment promptly or at all.
- ▮ **Manager Risk:** which is the risk that an actively managed mutual fund’s investment adviser will fail to execute the fund’s stated investment strategy.
- ▮ **Industry Risk:** is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual

funds that are significantly invested in that industry.

 **Liquidity Risk:** Investments in interval funds are illiquid.

Item 9: Disciplinary Information

A. Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment Clients.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither WI nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator/Trading Advisor.

Neither WI nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a commodity trading advisor.

The only compensation that Wisdom Index Advisors receives is from our clients directly. WI advisors may be appointed with one or more life insurance companies for the purpose of serving existing client policies.

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

The only compensation that Wisdom Index Advisors receives is from our clients directly. WI advisors may be appointed with one or more life insurance companies for the purpose of serving existing client policies.

D. Selection of Other Advisors

WI does not utilize nor select other advisors or third-party managers.

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

A. Code of Ethics

WI has developed a code of ethics that will apply to all of our employees. We and our Investment Advisor Representatives must act in a fiduciary capacity when providing investment advisory services to you. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. WI has a fiduciary duty to all clients. This fiduciary duty is considered the core underlying principle of our code of ethics, which also covers our insider trading, and personal securities transactions policies and procedures also to protect client's private identifiable information. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will acknowledge that they have read, understand and agree to comply with our Code of Ethics. Our Code of Ethics is available to clients and prospective clients upon request.

B. Recommendations Involving Material Financial Interests

WI does not recommend to Clients, or buy or sell for Client accounts, securities in which WI or a related person has a material financial interest.

C. Investing in Same Securities as Clients

WI representatives invest in the same securities they recommend to Clients. This is not a conflict of interest as these securities are public mutual funds, index funds, exchange traded funds and interval funds.

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

The Chief Compliance Officer of WI is Michael Davidson. He reviews all employee trades each quarter. His trades are reviewed by the Operations Manager. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that Clients of the firm receive preferential treatment. Most trades are mutual fund, exchange-traded funds, or interval funds which typically do not affect markets or securities prices.

Item 12: Brokerage Practices

A. Factors Considered in Selecting Custodians and/or Broker/Dealers

Brokerage fees, including account fees, trading costs and fund availability are primary factors used to consider a custodian.

1. Research and Other Soft Dollar Benefits.

Both WI and Clients receive access to research, trading software and services from custodians from fees the Client pays in connection with Client securities transactions. Although not considered "soft dollar" compensation, WI and Clients receive benefits from Custodians in the form of reports, software, and institutional trading support. WI generally does not produce or pay for such research, products or services from custodians and these services that WI receives from custodians benefit all WI Clients.

WI does not have any affiliation with product sales firms. WI recommends discount brokerage firms and trust companies (qualified custodians), such as Charles Schwab, Axos Advisors, Nationwide and Cadence Bank. WI does not receive fees or commissions from any of these arrangements.

2. Brokerage for Client Referrals

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

3. Directed Brokerage

- a. Currently WI uses Charles Schwab and Co., Axos Advisor Services, Nationwide Advisor Services and advance Bank Cadance Bank for custody and brokerage. WI will review on an annual basis best execution of transactions. The procedures for this review are documented in the WI Compliance Manual. Trading fees charged by the custodians are monitored regularly and are also reviewed on an annually basis. WI does not receive any portion of the trading fees.

By directing brokerage to Charles Schwab, or Axos Advisor Services, Clients may pay higher fees or transaction costs than those obtainable by other broker-dealers or custodians and that the Adviser may not be able to achieve the most favorable execution for client transactions. Not all Investment Advisers require their clients to use direct brokerage. WI believes that our Clients are paying a discounted and reasonable rate. You may pay higher or lower fees if you select another broker-dealer. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer for this type of directed brokerage account, unless we believe that such rates are unfair or unreasonable for the size and type of transaction. We believe that Charles Schwab, and Axos Advisor Services charges competitive commission on transactions they handle for us that are reasonable and customary.

b. Currently WI does not allow clients to direct brokerage, but clients can choose between Charles Schwab and Co, Axos Advisor Services, Nationwide Advisor Services and Cadence Bank.

B. Trade Aggregation

Typically, trades made at custodians are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit. However, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation. We may aggregate orders in order to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. In aggregated orders, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

In seeking best execution, the determinative factor is not always the lowest possible commission or transaction cost, but whether the transaction represents the best qualitative value, taking into consideration the full range of a Custodian's services including value of research, execution capability, commission rates and responsiveness. Therefore, WI will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

Specific, custodian recommendations are made to Clients based on their need for such services.

Item 13: Review of Accounts

A. Periodic Review of Client Accounts/Financial Plans

Client accounts are reviewed at least quarterly. Each business day, a tolerance test is performed to determine if Client accounts are "out of balance" from the target portfolio. The Investment Policy Statement is reviewed with the Client during Client meetings.

B. Review Triggers

If a Client portfolio moves outside of asset-class tolerances, WI will receive a notice that portfolio is outside of tolerance. This notification will trigger a portfolio review. This tolerance test is performed each business day.

C. Regular Reports

Each Client will receive monthly statements from the custodian. WI also maintains a Client portal where Clients can run reports on daily basis. WI posts additional reports to Client portals on monthly and quarterly basis.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties

WI does not receive any economic benefit directly or indirectly from any third party for advice rendered to Clients.

B. Referrals Out

WI does not have any referral programs or compensate others for referrals. WI is aware of the special considerations promulgated pursuant to Rule 206(4)-3 under the Investment Advisers Act of 1940. As such, appropriate disclosure shall be made, all written instruments will be maintained by WI and all applicable Federal and/or State laws will be observed.

Item 15: Custody

WI does not have custody of any accounts. We use Charles Schwab and Axos Advisor Services as the primary custodians and/or broker-dealer for all client accounts. Clients should receive at least quarterly statements from the broker-dealer or custodian that holds and maintains their investment assets. We urge Clients to carefully review such statements and compare this official custodial record to the account statements that we may provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If a Client notices any discrepancies, they should contact Michael Davidson at (972) 931-0063.

Through the custodian interface, WI will debit Client fees directly from the Client's advisory account. The Custodian will provide the Client immediate transaction confirmations and monthly statements, either by mail or electronically. Monthly statements list the total value of the account at the start and end of the month and itemize all transactions and security positions. For taxable accounts, the custodian will provide the Client consolidated year-end summary statements including IRS forms 1099 and other tax-related forms, as applicable. WI is not allowed to make alterations or amendments to the custodian's statement. This preserves the integrity of the custodian's statement and provides the Client with an independent appraisal of the account.

Item 16: Investment Discretion

WI accepts discretionary authority to manage securities accounts on behalf of Clients. WI has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, if the account is setup as non-discretionary, WI consults with the Client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Client provides this authority by approving WI for limited power of attorney for trading on related sections of custodial new account forms.

Item 17: Voting Client Securities

A. Proxy Votes

WI does not vote proxies on securities. Clients are expected to vote their own proxies. When assistance on voting proxies is requested, WI will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

B. Proxy Authority

WI does not have authority to vote proxies. Clients will receive their proxies or solicitations directly from their custodian or transfer agent.

Item 18: Financial Information

A. Financial Condition

A balance sheet is not required to be provided because WI does not serve as a custodian for Client funds or securities and does not require prepayment of fees of more than \$600 per Client six months or more in advance.

B. Discretionary Authority or Custody

WI does not have any financial impairment that will preclude the firm from meeting contractual commitments to Clients.

C. Bankruptcy Petitions in Previous Ten Years

WI has not been the subject of any bankruptcy petition.

Privacy Policy Statement

A. Our Promise

You have entrusted Wisdom Index Advisors with very important, nonpublic information. This personal and financial data is yours; therefore, it should remain private. We will not sell or share, for marketing purposes, any client, former client or prospective client information that we collect. We will use your non-public information only to complete transactions or services that you request.

B. Information We Collect

To provide advisory services, we will need information including name and address, social security or tax identification number, date of birth, assets, income, account balances, investment history, account information, important relationships, financial goals and values and risk tolerance information. We may receive information about you that you authorize third parties to provide to us. We also may obtain personal information from third parties to verify your identity, to prevent fraud, or to help us identify products and services that may benefit you. We do not disclose nonpublic personal information about current or former clients to non-affiliated third parties unless required by law or authorized by you.

C. Safeguards

To protect your personal information, we maintain physical, electronic, and procedural safeguards keeping with industry standards and practices. We require firms that provide us with services for your account to execute contracts providing confidential treatment of your information. Our Custodian and Client Portal(s) use data encryption technologies including user names and passwords to provide a high-level of security and privacy when accessing your account information on-line.

D. Other Advisors

To benefit from Walking in Wisdom®, our Wealth Management process, Wisdom Index Advisors might need to communicate with your other affiliated advisors, including, but not limited to, your Estate Planning or Tax Attorney, C.P.A, Actuary and Insurance providers for information necessary for wealth planning. We will obtain your authorization to make these communications.

E. Updates

As required by federal law, we will notify you of our privacy policy annually. If our policy is modified at any time, we will notify you immediately. Should you have any concerns, please call us at (972) 931-0063.

F. Disclosures

At least annually, Wisdom Index Advisors updates our Form ADV I, Form ADV Part 2 and Form CRS. These documents describe our service model, business practices and relationships with others. If you would like a copy of these documents, please call (972) 931-0063. You may also receive the most recent Form ADV Part I on the Internet at www.adviserinfo.sec.gov.