

**Brochure**

**Form ADV Part 2A**

**Item 1 - Cover Page**



**CRD# 135037**

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**November 26, 2019**

This Brochure provides information about the qualifications and business practices of Weaver Capital Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (678) 341-1333 or [invest@WeaverCapital.com](mailto:invest@WeaverCapital.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.

Weaver Capital Management, LLC 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 Weaver Capital Management, LLC also is available on the SEC's website at [www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

**Item 2 - Material Changes**

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform you of the nature of advisory services provided, types of you served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all you within 120 days of our fiscal year-end. Our last annual update was filed on January 23, 2019. Of course the complete Brochure is available to you at any time upon request.

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

### **General Information**

Weaver Capital Management, LLC ("WCM") is a Registered Investment Advisory Firm that provides private wealth management, discretionary investment management services and retirement plan advisory services to our clients. We practice a fee-only business model and we are compensated based on a percentage of assets under management. This fee-only platform places WCM in a fiduciary role, thereby minimizing the inherent conflicts of interest found so frequently in traditional brokerage firms.

Founded in 2005, WCM has a heritage that dates back over 25 years when DeWitt Weaver started Linksman Financial in January 1993. The firm's faith-based values have always been the cornerstone of developing and implementing sound financial plans for clients.

DeWitt T. Weaver, III is the founder and principal owner of WCM. Please see ***Brochure Supplements, Exhibit A***, for information on DeWitt and other WCM individuals who formulate investment advice and have discretionary authority over client accounts.

As of December 31, 2018, WCM managed \$156,831,999 on a discretionary basis, and \$5,612,392 assets on a non-discretionary basis. WCM does not participate in or offer any wrap programs.

### **SERVICES OFFERED**

In the typical client relationship, we assist you with long and short term financial goals, lifestyle expenses, retirement, education and estate plans. Our specialized financial planning enables you to view in-depth projections regarding multiple aspects of your financial future. At the core, we offer to you a diligent investment management process based on sound principals of risk management.

We offer two levels of fee-only management services to you: Investment Management and Wealth Management as described below.

#### **Investment Management**

For Investment Management clients we generally will:

- Develop an Investment Strategy based on your unique goals and needs
- Manage your portfolio in alignment with your investment strategy
- Provide quantitative target goal projections and analysis for retirement and/or college savings
- Provide investment reports from time to time or as requested by you
- Provide access to our network of CPAs, Attorneys, or Agents
- Provide a customized personal wealth management website

You are taken through a questionnaire to evaluate your attitudes towards risk. We will use the results of this questionnaire along with other client assessments to assign you a suitable investment model ranging from Preservation to Enhanced Growth.

#### **Wealth Management**

For the Wealth Management offering, in addition to the Investment Management services above we generally will:

- Prepare a Comprehensive Financial Plan
- Plot a course for the achievement of financial independence

- Provide assistance with setting other financial goals
- Develop charitable giving strategies
- Review and recommend tax strategies
- Develop an Estate Plan and assess potential estate tax liability
- Evaluate Life, Disability and Long-Term Care Insurance needs
- Collaborate with your other professionals for implementation

Both service offerings above incorporate the Portfolio Management services detailed below:

#### Portfolio Management

After the completion of a Risk Profile, we assess your market experience, time horizon, liquidity constraints and any other information vital to your Investment Plan. Based on the results of this analysis, we present an Investment Model to you that we feel best aligns with your ability to tolerate risk. After reviewing the market exposure, target returns and risks of the recommended Investment Model, we validate the selection with you.

The Investment Plan will be updated when requested by you, or when determined to be necessary or advisable by us based on updates to your financial or other circumstances.

To implement your Investment Plan, we will manage your investment portfolio on a discretionary or a non-discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct the portfolio without prior consultation with you. Under a non-discretionary arrangement, you must be contacted prior to the execution of any trade in your account(s) under management. This can result in a delay in executing recommended trades, which could adversely affect the performance of your portfolio. This delay also normally means the affected account(s) will not be able to participate in block trades, a practice designed to enhance the execution quality, timing and/or cost for all accounts included in the block. In a non-discretionary arrangement, you retain the responsibility for the final decision on all actions taken with respect to your portfolio.

Additionally, you may impose certain written restrictions on us in the management of your investment portfolio, 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 our relationship. You should note, however, that restrictions imposed by you may adversely affect the composition and performance of your investment portfolio. For these and other reasons, performance of client investment portfolios within the same investment objectives, goals and/or risk tolerance may differ. Furthermore, you should not expect that the composition or performance of your investment portfolios would necessarily be consistent with clients in similar Investment Models of ours.

#### Retirement Plan Advisory Services

We provide a comprehensive consulting services to employer sponsored retirement plans, including 401(k), pension and profit sharing plans (the "Plan(s)"). These services may include:

- Retirement plan design and communications;
- Retirement plan service provider search;
- Retirement plan investment advisory services, including: investment analysis, selection, implementation, and ongoing monitoring of plan investments; and
- Participant educational services and retirement education.

When we provide advice to Plan fiduciaries on investment management issues, we act as co-fiduciary within the meaning of ERISA § 3(21)(A)(ii). To the extent that we exercise discretion over the management of Plan assets, we are also an investment manager within the meaning of ERISA § 3(38).

Establishing a sound fiduciary governance process is vital to good decision-making and to ensuring that prudent procedural steps are followed in making investment decisions. We will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the Plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 ("ERISA") sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, we will be considered a fiduciary under ERISA. For example, we will act as an ERISA § 3(21) fiduciary when providing non-discretionary investment advice to the Plan Fiduciaries by recommending a suite of investments as choices among which Plan Participants may select. Also, to the extent that the Plan Fiduciaries retain us to act as an investment manager within the meaning of ERISA § 3(38), we will provide discretionary investment management services to the Plan.

With respect to any account for which WCM meets the definition of a fiduciary under Department of Labor rules, we acknowledge that both WCM and our Related Persons are acting as fiduciaries. Additional disclosure may be found elsewhere in this Brochure or in the written agreement between WCM and the Client.

#### Fiduciary Consulting Services

- *Investment Selection Services*

We will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).

#### Fiduciary Management Services

- *Discretionary Management Services*

When retained as an investment manager within the meaning of ERISA § 3(38), we provide continuous and ongoing supervision over the designated retirement plan assets. We will actively monitor the designated retirement plan assets and provide ongoing management of the assets. When applicable, we will have discretionary authority to make all decisions to buy, sell or hold securities, cash or other investments for the designated retirement plan assets in our sole discretion without first consulting with the Plan Fiduciaries. We also have the power and authority to carry out these decisions by giving instructions, on your behalf, to brokers and dealers and the qualified custodian(s) of the Plan for our management of the designated retirement plan assets.

- *Discretionary Investment Selection Services*  
We will monitor the investment options of the Plan and add or remove investment options for the Plan without prior consultation with the Plan Fiduciaries. We will have discretionary authority to make and implement all decisions regarding the investment options that are available to Plan Participants.
- *Investment Management via Model Portfolios*  
We will provide discretionary management of Model Portfolios among which the participants may choose to invest as Plan options. Plan Participants will also have the option of investing only in options that do not include Model Portfolios (i.e., the Plan Participants may elect to invest in one or more of the mutual fund options made available in the Plan, and choose not to invest in the Model Portfolios at all).

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

#### **Portfolio Management Fees**

We practice a fee-only business model and are compensated based on a percentage of assets under management. The annual fee schedule is as follows:

<u>Account Balance</u>	<u>Annual Fee</u>
First \$500,000	1.50%*
Next \$2,000,000	1.00%
Assets above \$2,500,000	0.75%

\* A minimum annual fee of \$2,500 will be charged for Investment Management Services.

Accordingly, as an example, if an account is valued at \$750,000, the first \$500,000 would be charged 1.50% annually, while the balance of \$250,000 would be assessed the lower fee of 1.00% per year.

Portfolio management fees are generally payable quarterly, in advance. Fees are prorated for cash flows exceeding \$5,000. If management begins after the start of a quarter, fees will be prorated accordingly. With your authorization, and unless other arrangements are made, fees are normally debited directly from your account(s). We may, at our discretion, make exceptions to the foregoing or negotiate special fee arrangements where we deem it appropriate under the circumstances.

For accounts with a margin balance, you are assessed the management fee based on the gross value of the assets in the account. In other words, the account value on which the fee is calculated is not reduced by the margin balance.

Fees paid to us are exclusive of all custodial and transaction costs paid to your custodian, brokers or other third party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to us 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). You should review all fees charged by us, funds, custodians and others to fully understand the total amount of fees paid by you for investment and financial-related services.

Either WCM or you may terminate your 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 you based on the number of days that the account was

managed, and any fees due to us from you will be invoiced or deducted from your account prior to termination.

#### Wealth Management Planning Service Fees

Clients in the "Investment Management" service offering may engage in the enhanced "Wealth Management" planning service for the following one-time non-refundable fee:

<u>Assets Under Management</u>	<u>One-Time Wealth Management Fee</u>
Portfolios under \$500,000	\$2,500
\$500,000 - \$750,000	\$1,000
Portfolios above \$750,000	No Additional Fee

#### Retirement Plan Advisory Fees

Retirement Plan Advisory Services fees are individually determined and agreed upon with the Plan fiduciary(ies) at the time of the engagement. Fees are typically based on the type of Plan, the services requested, the complexity of the Plan, and other factors. The specific suite of services to be provided, applicable fees and manner of fee collection are set forth in the agreement with each Plan.

Plan recordkeeping fees, third-party administrator fees, custody fees, trustee fees and any other third-party fees are in addition to fees charged by us. Participants may also pay account related fees, such as loan processing and maintenance fees, distribution processing fees, and investment transaction fees.

The Plan and/or participants are also subject to the fees and expenses charged by the underlying mutual funds and other third-parties (see *General Fee Information* above). Plan fiduciaries are responsible for determining whether the combination of fees described above are reasonable in light of the services received from each party.

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

We do 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 we have no performance-based fee accounts, we have no side-by-side management.

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

We work with individuals, pension and profit-sharing plans, corporations, trusts, estates and charitable organizations. With some exceptions, the minimum portfolio value eligible for investment management services is \$1,000,000, and the annual minimum fee charged is \$2,500. Under certain circumstances and in our sole discretion, we may negotiate such minimums.

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

##### Methods of Analysis and Investment Strategies

We invest in a broad range of securities including individual Large Cap stocks, Exchange Traded Funds ("ETFs"), Mutual Funds and Individual Fixed Income securities for your accounts. Individual securities are generally evaluated and selected based on a variety of factors, including, without limitation, consistency of performance and free cash flow. We generally employ a long-term, value-oriented investment focus for individual large cap stocks. Funds are evaluated based on fee structure,

portfolio manager, fund sponsor, overall ratings for safety and returns and other factors. Specifically, we begin with an overview of the more than 5,000 funds available at Charles Schwab & Co., Inc., the primary custodian of choice for us. The selection process begins by identifying quality funds in four primary areas: US Stock funds; International funds; fixed income funds, and alternative funds. The field is then narrowed by identifying the top 10% of each group in terms of its three-year total return and its three-year Sortino ratio, which is a risk-adjusted measure of performance. The risk/reward relationship is further explored by evaluating the standard deviation of a fund's performance, as well as other statistical studies. Finally, a comprehensive analysis is undertaken, evaluating the fund's management, macro market conditions, specific holdings in the fund, the net long and short positions in the fund, and other factors.

Our Investment Models incorporate Global Equity funds of all market caps, Alternative Investment Funds and Fixed Income Funds that exhibit consistent top tier performance. To further exercise prudent risk management, we incorporate an allocation strategy that utilizes ETFs to adjust risk levels in portfolios during times of negative market momentum and high market volatility. We may also invest directly in equity securities where we deem appropriate.

In making selections of investments for your portfolios, we may use any of the following types of analysis:

**Fundamental Analysis** – involves review of the business and financial information about an issuer.

**Charting Analysis** – involves gathering and processing price and volume information for a particular security.

**Technical Analysis** – involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

**Cyclical Analysis** – is a type of technical analysis that involves evaluating recurring price patterns and trends.

Direct fixed income investments may be used as a strategic investment, as an instrument to fulfill liquidity or income needs in a portfolio, or to add a component of capital preservation. We will generally evaluate and select individual bonds or bond funds based on a number of factors including, without limitation, rating, yield and duration.

From time to time, we may recommend that you invest a portion of your assets in one or more private investment funds.

#### Risk of Loss

While we seek to diversify your investment portfolios across various asset classes consistent with your Investment Plan in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that your investment portfolio will be able to fully meet your investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that your investment portfolio faces.

*Management Risks.* While we manage your investment portfolio based on our experience, research and proprietary methods, the value of your investment portfolio will change daily based on the



performance of the underlying securities in which they are invested. Accordingly, your investment portfolios are subject to the risk that we allocate your investments to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, we will invest your 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 portfolio; 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 your 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.

*Equity Market Risks.* We may invest portions of your assets directly into equity investments 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.* We may invest portions of your 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.* We may invest portions of your assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of your investment portfolio, 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.* As a general practice, we do not use margin in investment strategies. However, you may elect to borrow funds against your investment portfolio. When securities are purchased, they may be paid for in full or you may borrow part of the purchase price from the account custodian. If you borrow part of the purchase price, you are 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 you money. If those securities decline in value, then the value of the collateral supporting your loan also declines. As a result, the brokerage firm is required to take action in order to maintain the necessary level of equity in your account. The brokerage firm may issue a margin call and/or sell other assets

in your account. It is important that you fully understand the risks involved in trading securities on margin, including:

- You can lose more funds than you deposit in your margin account;
- The account custodian can force the sale of assets in your account;
- The account custodian can sell your assets without contacting you first;
- You are not entitled to choose which assets in your 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
- You are not entitled to an extension of time on a margin call.

#### ***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 us or the integrity of our management. We have no disciplinary events to report.

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

Neither WCM nor our Management Persons has any other financial industry activities or affiliations to report.

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

##### Code of Ethics and Personal Trading

We have adopted a Code of Ethics (“the Code”), the full text of which is available to you upon request. Our Code has several goals. First, the Code is designed to assist us in complying with applicable laws and regulations governing our investment advisory business. Under the Investment Advisers Act of 1940, we owe fiduciary duties to you. Pursuant to these fiduciary duties, the Code requires persons associated with us (managers, officers and employees) to act with honesty, good faith and fair dealing in working with you. 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 our associated persons. Under the Code’s Professional Standards, we expect our associated persons to put the interests of its clients first, ahead of personal interests. In this regard, our associated persons are not to take inappropriate advantage of their positions in relation to you.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, our associated persons may invest in the same securities recommended to you. Under the Code, we have 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 personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage you. The Code also provides for disciplinary action as appropriate for violations.

### Participation or Interest in Client Transactions

As outlined above, we have adopted procedures to protect your interests when our associated persons invest in the same securities as those selected for or recommended to you. In the event of any identified potential trading conflicts of interest, our goal is to place your interests first.

Consistent with the foregoing, we maintain policies regarding participation in initial public offerings ("IPOs") and private placements to comply with applicable laws and avoid conflicts with your transactions. If our 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.

Finally, when associated persons trade with your accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with our written policy.

### ***Item 12 - Brokerage Practices***

#### Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in your accounts, we seek "best execution" for client trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, we may use or recommend the use of brokers who do not charge 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 our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

We recommend that you establish brokerage account(s) with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, as qualified custodian to maintain custody of your assets. We also effect trades for your accounts at Schwab, or may in some instances, consistent with our duty of best execution and specific agreement with you, elect to execute trades elsewhere. Although we may recommend that you establish accounts at Schwab, it is ultimately your decision to custody assets with Schwab. We are independently owned and operated and are not affiliated with Schwab.

Schwab provides us with access to its institutional trading, custody, reporting and related services, which are typically not available to Schwab retail investors. Schwab also makes available various support services. Some of these services help us manage or administer your accounts while others help us manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform offered by Schwab. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For your accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab Advisor Services also makes available to us other products and services that

benefit us but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of our fees from our clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help us manage and further develop our business enterprise. These services may include: (i) technology, compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to us. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that you custody your assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

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

DeWitt Weaver, WCM's President, reviews all accounts monthly during scheduled Investment Committee Review meetings. Investments are tracked at least weekly, or more often if conditions merit or at your request.

For clients under the Wealth Management service offering, financial plans are reviewed on an as needed or agreed upon basis.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions, current pricing, transactions and fees paid. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. In addition, you may receive additional summary reports from us from time to time with additional performance information. You may also request reports at any time regarding your managed accounts.

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

As noted above, we receive an economic benefit from Schwab in the form of support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. 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 Schwab's products and services to us is based solely on our participation in the programs and not in the provision of any particular investment advice. Neither Schwab nor any other party is paid to refer clients to us.

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

Charles Schwab & Co., Inc. is the primary custodian of your accounts. From time to time however, you may select alternative brokers to hold your accounts in custody. In any case, it is the custodian's responsibility to provide you with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with our agreement with you, we 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 and other similar issues.

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

As described in ***Item 4 - Advisory Business***, we will accept clients on either a discretionary or non-discretionary basis. For *discretionary accounts*, a Limited Power of Attorney ("LPOA") is executed by you, giving us the authority to carry out various activities in your account, generally including the following: trade execution; the ability to request checks on your behalf; and, the withdrawal of advisory fees directly from your account. We then direct investment of your portfolio using our discretionary authority. You may limit the terms of the LPOA to the extent consistent with your investment advisory agreement with us and the requirements of your custodian.

For *non-discretionary* accounts, you also generally execute an LPOA, which allows us to carry out trade recommendations and approved actions in the portfolio. However, in accordance with our investment advisory agreement, we do not implement trading recommendations or other actions in your account unless and until you have approved the recommendation or action. As with discretionary accounts, you may limit the terms of the LPOA, subject to our agreement with you and the requirements of your custodian.

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

Where we have authority to vote proxies, we will seek to vote proxies in the best interest of the client(s) holding the applicable securities. In voting proxies, we consider factors that we believe relate to your investment(s) and factors, if any, that are set forth in written instructions from you.

In general, we believe that voting proxies in accordance with the following guidelines, with respect to such routine items, is in the best interests of our clients. Accordingly, we generally vote **for**:

- The election of directors (where no corporate governance issues are implicated);
- Proposals that strengthen the shared interests of shareholders and management;
- The selection of independent auditors based on management or director recommendation, unless a conflict of interest is perceived;
- Proposals that we believe may lead to an increase in shareholder value;
- Management recommendations adding or amending indemnification provisions in charter or by-laws; and
- Proposals that maintain or increase the rights of shareholders.

We will generally vote **against** any proposals that we believe will have a negative impact on shareholder value or rights. If we perceive a conflict of interest, our policy is to notify affected clients so that they may choose the course of action they deem most appropriate.

A copy of our complete policy, as well as records of proxies voted; are available to you upon request. As required under the Advisers Act, such records are maintained for a period of five (5) years.

***Item 18 - Financial Information***

We do not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore have no disclosure required for this item.

# **Exhibit A**

**Brochure Supplement**

**Form ADV Part 2B**

**Item 1 - Cover Page**

**DeWitt T. Weaver, III, CFP®**

**CRD# 2731666**

**of**

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**November 26, 2019**

This Brochure Supplement provides information about DeWitt T. Weaver, III and supplements the Weaver Capital Management, LLC ("WCM") Brochure. You should have received a copy of that Brochure. Please contact us at (678) 341-1333 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

Additional information about DeWitt is available on the SEC's website at  
[www.AdviserInfo.sec.gov](http://www.AdviserInfo.sec.gov).

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

DeWitt T. Weaver, III (born in 1965) is President and founder of Weaver Capital Management, LLC. As a personal wealth advisor, DeWitt provides comprehensive investment and financial planning strategies to families and businesses.

He began his advisory career in 1993 with the forming of Linksman Financial, a registered investment advisory firm dedicated to managing the financial affairs of professional golfers. Having pursued a professional golf career himself, he found that there was a great need amongst his peers for non-biased, personal financial advice. In 1996 he expanded his practice to provide comprehensive wealth management to individuals of all professions and later renamed the firm Weaver Capital Management, LLC. In 2006, DeWitt launched the Fisherman Fund to complement Weaver Capital's investment offerings. He ran this private hedge fund until 2010 when he made the decision to step away from the management of the fund to center his focus more directly on his advisory clients.



DeWitt is a cum laude graduate of Southern Methodist University with a BA in Accounting and Finance. He became a CERTIFIED FINANCIAL PLANNER™ professional\*\* in September of 1996 and is registered with the Certified Financial Planner Board of Standards, Inc. In 2010 he became a Qualified Kingdom Advisor, which is a designation granted to Christian financial professionals who have completed extensive training in biblical stewardship.

DeWitt is an active member of Johns Creek Baptist Church and The Rotary Club of Johns Creek. He supports many local and worldwide charities. DeWitt is a member of the Atlanta Athletic Club and Laurel Springs Country Club and enjoys competing occasionally in local, national and international golf events.

DeWitt makes his home in Suwanee, Georgia with his wife, Michele, and their four children Forde, Mary Evans, Jack and Landry.

\*\* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. (CFP Board). To attain the certification, the candidate must complete the required educational, examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component, and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

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

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, DeWitt has no such disciplinary information to report.

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

DeWitt is not engaged in any other investment-related business or occupation, and does not earn compensation for the sale of any other products or services.

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

As stated above, DeWitt has no other income or compensation to disclose.

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

As President of Weaver Capital Management, LLC, DeWitt supervises all duties and activities of the firm, and reviews all client accounts. His contact information is on the cover page of this disclosure document.