

**Part 2A of Form ADV  
Firm Brochure for:  
Financial Planning Services**



801 - 57434

**Investment Advisory Services of Wells Fargo Advisors Financial Network, LLC**

Revised March 2011

Wells Fargo Advisors is the trade name used by two separate broker-dealers: Wells Fargo Advisors, LLC and Wells Fargo Advisors Financial Network, LLC. Members SIPC, and non-bank affiliates of Wells Fargo & Company.

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**This brochure provides information about the qualifications and business practices of Wells Fargo Advisors Financial Network, LLC and our Financial Planning Services. This information should be considered before becoming a Client. If you have any questions about these services or the contents of this brochure, please contact us at the telephone number above.**

**This information has not been approved or verified by United States Securities and Exchange Commission or by any state securities authority. Additional information about Wells Fargo Advisors also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**The advisory services described in this brochure are not insured or otherwise protected by the U.S. Government, the Federal Deposit Insurance Corporation, the Federal Reserve Board, or any other government agency and involve risk, including the possible loss of principal.**

## **Summary of Material Changes**

There have been no material changes since March 2010.

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## **Advisory Business**

### **Firm Description and Ownership**

Wells Fargo Advisors Financial Network, LLC ("WFAFN"), is a broker-dealer and investment advisory Firm providing investment and other financial services to individual, corporate, and institutional clients through a network of independent contractor representatives. It is a non-bank affiliate of Wells Fargo & Company ("Wells Fargo"), a financial holding company and bank holding company founded in 1852 and publicly held company (NYSE: WFC). Wells Fargo and its Affiliates are engaged in a number of financial businesses, including retail brokerage and investment advisory services.

Wells Fargo Advisors Financial Network, LLC is affiliated with Wells Fargo Advisors, LLC ("WFA"), a broker-dealer and investment adviser that also provides advisory and brokerage services, and First Clearing, LLC ("FCLLC"), a broker-dealer providing securities-execution and brokerage-clearance services to WFA, WFAFN, and other retail securities firms throughout the United States. Wells Fargo & Company also provides advisory and brokerage services through H.D. Vest Advisory Services, Inc. and H.D. Vest Investment Securities, Inc. ("HDV"). Information about the advisory and brokerage services offered by WFA and HDV are available by contacting them directly.

WFAFN has entered into an agreement with WFA, a non-bank affiliate of WFAFN, pursuant to which WFA will act as sub-adviser and/or service provider to WFAFN with respect to the advisory Programs and services offered by the Firm. WFA is a member of the New York Stock Exchange, Inc. ("NYSE") and the principal stock exchanges in the nation, as well as FINRA and SIPC.

The terms "client," "you," and "yours" are used throughout this document to refer to the person(s) or organization(s) who contract with us for the services described here. "WFAFN," "we," "our," and "us" refer to WFAFN together with our Affiliates, including but not limited to, Wells Fargo & Company and its agents with respect to any services provided by those agents. "Affiliate" means any entity that is controlled by, controls or is under common control with WFAFN. Each Affiliate is a separate legal entity, none of which is responsible for the obligations of the other.

"Account" means collectively or individually any brokerage Account and/or any Advisory Program Account you have with us, including any and all funds, money, securities and/or other property you have deposited with us. "Securities and/or Other Property" means, but is not limited to, money, securities, financial instruments and commodities of every kind and nature and related contracts and options, distributions, proceeds, products and accessions of all property.

### **Types of Advisory Services**

WFAFN sponsors a number of wrap fee advisory programs that are designed to help clients meet their investment objectives and goals. They include Separately Managed Account Programs, Mutual Fund Advisory Programs, Financial Advisor-Directed Programs and Non-Discretionary Advisory Programs ("Programs"). WFAFN also offers Consulting and Financial Planning advisory services. This Disclosure Document is being provided pursuant to Section 204 of the Investment Advisers Act of 1940 and deals solely with our Financial Planning Services. Descriptions of the services and fees for the other programs and services we offer can be found in separate disclosure documents, copies of which are available upon request.

### **Financial Planning Services**

We offer financial planning services to both prospective and existing Clients. Prior to preparing financial planning advice for you, your Financial Advisor ("FA") will obtain information about you. Generally, financial plans are developed for prospective and existing clients with \$5 million Net Worth (\$10 million for married couples requesting a Comprehensive Estate Analysis). Such information generally will include:

- Your current financial situation, including the amount and nature of your assets and liabilities, the amounts and sources of current and anticipated income, the amounts and types of current and projected expenses (including educational expenses and insurance coverage);
- Your current and long-term financial goals, objectives, and desires (including retirement goals);
- Your risk tolerance.

These planning services may be provided in several forms. The first financial planning service available to those clients identified by their financial advisors is the Valued Investor Planning (VIP) program. This program includes an in-person visit by you to our St. Louis Home Office. Prior to the visit, you will provide financial data that is used to prepare a comprehensive financial report. This report, along with the advice given during the Home Office visit, constitutes the financial plan for purposes of the VIP program ("financial plan" or "VIP program"). During the visit, the specialists who prepared the financial plan will meet with you and present various sections of the plan, which can include (based upon your needs and financial data): asset allocation; equity strategies; fixed-income investment strategies; concentrated equity strategies; stock option analysis; private money management alternatives; retirement planning strategies; suggestions for basic and advanced estate planning strategies; philanthropic planning; and education suggestions for children. If appropriate, the VIP visit concludes with an Action Plan summarizing key issues and outlining action steps for consideration. Currently, there is no charge for the VIP financial plan. We are under no obligation to update the financial plan. Any advisory service established with us concerning the financial plan concludes with your completion of the Home Office visit and/or the receipt of the VIP financial plan report.

Services rendered in the VIP program or any other financial planning services are for one-time financial plans, not ongoing advice. You may request an updated VIP program or financial plan by completing an updated client agreement and may be subject to an additional fee.

The second type of financial planning service available is the financial planning advice provided by the WFA Key Client Solutions Group in conjunction with your FA which is delivered in the form of a written report. Typically, Key Client Solutions will produce two types of financial plans: (1) a Personal Financial Review or; (2) a Confidential Estate Analysis.

- Where you have requested a Personal Financial Review, the report generally includes any or all of the following, as applicable: a summary of your financial goals; an analysis of your personal net worth (including a balance sheet and an analysis of your current asset mix); education planning to determine the savings required to fund education goals; retirement security analysis; life insurance summary; estate planning considerations (including estate value estimates, federal estate tax estimates, and an explanation of both basic and advanced strategies); and a summary and action plan (action plans do not include specific investment recommendations).
- Where you have requested a Confidential Estate Analysis, the report generally will include a balance sheet by ownership of assets, estimates of the estate's value for you (and your spouse), and estimated estate tax calculations. When appropriate, the report also includes, for consideration, an explanation of both basic and advanced estate planning strategies.

Financial planning advice may involve recommendations regarding general asset classes, such as equities (both domestic and foreign), debt, government securities, and municipal securities, or general types of investment vehicles in which you may invest. Investment techniques and strategies recommended in a financial plan generally will involve long-term or short-term holdings of securities or other investment products, and insurance and trust strategies, depending on Client's financial goals, objectives and desires.

Unless otherwise specifically agreed to by WFAFN, neither the Key Client Solutions Group, nor your FA shall have duties or obligations with respect to the implementation of your financial plan and, without limiting the generality of the foregoing, they shall have no duty or obligations to provide investment advisory or investment management services to you that are outside the scope of the services discussed above.

We recommend that each financial planning Client work closely not only with your FA in the course of formulating a financial plan, but also with your legal, estate planning, tax, accounting and other special advisors (collectively, "Specialists"). For your convenience and in order to provide you with a "seamless" financial plan that efficiently incorporates legal, estate planning, and tax accounting matters, we and our FAs may maintain ongoing relationships with certain legal, accounting and consulting firms with whom we may consult and to whom we may refer Clients for advice on those matters. However, no Client is obligated to use the services of any such firm, and neither we nor your FA assume any responsibility for recommendations made, advice given or documentation provided to you by any such firm.

Each Specialist retained by you will act solely as agent for you and not for our firm.

### **Services Tailored to Individual Client Needs**

Each of the advisory services we offer is tailored to the Client and designed to meet their individual investment objectives, financial needs and tolerance of risk. They are drawn from research and analysis we believe to be reliable and appropriate to your financial circumstances.

### **Portfolio Management Services**

WFAFN acts as portfolio manager for certain wrap fee advisory programs that it offers to Clients and collects a fee for performing that service. WFAFN does not act as a portfolio manager for the services described in this brochure.

### **Assets Under Management**

As of Dec 31, 2010, WFAFN manages \$8,979,345,248 of client assets on a discretionary basis and \$7,680,419,134 of client assets on a non-discretionary basis.

### **Fees and Compensation**

Our financial planning fees vary, depending upon the extent, nature and complexity of the advice requested. You are charged a flat fee for the financial planning services provided. The fees may be subject to negotiation. In some cases, fees may be waived. Fees for a Personal Financial Review may be up to \$3,000. Generally, fees are paid upon the initiation of the plan. As discussed above, there is presently no charge for the VIP financial plan, nor is there a charge for the Confidential Estate Analysis. A portion of the fees for the Program services described herein may be paid to our Financial Advisors in connection with the introduction of accounts as well as for providing client-related services within the Program.

The advisory service established with us pertaining to the financial plan concludes with your receipt of the written financial plan report.

We and your Financial Advisor will not provide legal or accounting advice, and the fees payable by you under the Financial Planning Client Agreement cover only the services rendered by us and do not cover fees of your Specialists. In this regard, we and your Financial Advisor are not responsible for drafting or providing any legal or other documentation, or taking any other action relating to or arising from implementation of your financial plan (subject to the considerations set forth in the following paragraph).

The fees described above do not cover fees and expenses (such as investment management fees and brokerage expenses) incurred in connection with the implementation of a financial plan. You may elect to implement a financial plan in whole or in part through us but are under no obligation to do so. In the event you elect to implement a financial plan through us, you will be provided with an appropriate disclosure document describing the nature and extent of the services provided by us, the fees charged by us for those services and other related matters. The fees charged by us in connection with the implementation of a financial plan are in addition to the fees incurred by you in connection with the formulation of that plan. As a result, your FA has an incentive to recommend the implementation of the plan through us and may have an incentive to recommend certain products or services over others based on the compensation they may receive. We intend, however, to make all recommendations independent of such compensation considerations and based solely on our obligations to consider the Clients' objectives and needs.

### **Termination**

Client Agreement between WFAFN and Client will terminate when all services to be performed by WFAFN thereunder have been performed and all fees payable by Client to WFAFN thereunder have been paid, but also may be terminated earlier by either party by giving written notice to the other. Upon an early termination by Client, or by WFAFN for cause (as defined in Client Agreement), Client shall remain responsible for compensating WFAFN for services rendered up to the time of termination. If WFAFN terminates Client Agreement without cause, Client shall not be obligated to compensate WFAFN for services thereunder. Subject to the provisions of the preceding sentence, termination of Client Agreement shall not affect the liabilities or obligations of the parties arising from or in connection with services performed prior to such termination.

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

WFAFN does not charge performance- based fees in any of its investment advisory programs. WFAFN does not have any side-by-side management situations.

## **Types of Clients**

WFAFN provides the advisory services described in this brochure to individuals, pension or profit sharing plans, trusts, estates or charitable organizations, corporations or other business entities, governmental entities and educational institutions, as well as banks or thrift institutions

## **Methods of Analysis, Investment Strategies and Risk of Loss**

The Firm bases its Financial Planning advice on capital markets assumptions and asset allocation models that it developed. Through the use of analytical tools, we may review your current asset allocation and develop a recommended asset allocation based on your individual financial goals and objectives. You have the option whether to implement all or a part of your plan through us. If you choose to implement any portion of your plan through one of the advisory programs that we offer, you will be provided with an additional disclosure document describing those services.

### **Risk of Loss**

If you choose to implement any portion of your plan through us, please be aware that all investments shall be at your risk exclusively, and you must understand that we do not guarantee any return on the investments recommended or advised upon.

## **Disciplinary Information**

WFAFN is both a broker-dealer and investment advisory Firm. In the past ten years, WFAFN has not been involved in any material disciplinary events as an investment adviser. The disciplinary events listed below are related to the activities of the broker-dealer.

For more information on broker/dealer related disciplinary events you may visit:

<http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/>

WFAFN's investment advisory disciplinary history is available by going to:

<http://www.adviserinfo.sec.gov/>

- In February 2009, WFAFN agreed to a settlement with FINRA regarding allegations that the Firm made recommendations through its registered representatives to customers to purchase Class B and Class C mutual fund shares where an equal investment in Class A shares would have been more advantageous for certain clients and failed to establish, maintain and enforce supervisory systems and procedures reasonably designed to provide consideration, on a consistent basis, of the benefits of various mutual fund classes as they applied to individual customers. Without admitting or denying the findings, the Firm consented to a censure, a fine of \$150,500 and undertakings that included remediation to certain customers.
- In February 2006, the Firm agreed to a settlement with the State of Florida, Office of Financial Regulation regarding allegations that the Firm's supervisory system was inadequate to consistently provide available NAV transfer pricing to clients in connection with mutual fund purchases. Without admitting or denying the findings, the Firm consented to a censure, a \$50,000 fine and remediation to certain clients.

## **Other Financial Industry Activities and Affiliations**

WFAFN is a leading national securities firm providing investment and other financial services to individual, corporate and institutional Clients. We are a registered broker-dealer, investment adviser and futures commission merchant.

Accounts are carried by First Clearing, LLC (FCLLC), a qualified custodian. FCLLC is an affiliate owned indirectly by Wells Fargo. WFAFN and FCLLC are members of all principal stock exchanges in the United States, including the New York Stock Exchange and NASDAQ. WFAFN and FCLLC are also members of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). FCLLC may also route transactions through its affiliate, Wells Fargo Securities, LLC.

WFAFN is a non-bank affiliate of Wells Fargo. WFAFN is not a bank or thrift and is a separate and distinct corporate entity from its affiliated banks. **Unless otherwise stated as the case, the investment advisory services offered and the underlying stock, bonds, mutual funds and other securities bought or sold through us are not deposits of any bank and are not insured or otherwise protected by the Federal Deposit Insurance Corporation ("FDIC") or another government agency. They are not obligations of any bank or any affiliate of WFAFN; are not endorsed or guaranteed by Wells Fargo, WFAFN, or any bank or any affiliate of WFAFN; and involve investment risk including possible loss of principal. Cash balances in Client Accounts may be held in a depository product sponsored by a Wells Fargo entity. Deposit products, like the cash sweep program, are protected by FDIC insurance up to applicable limits.**

Our obligations and commitments do not extend to any affiliated bank or thrift, and any such bank or thrift is not responsible for securities we sell or purchase. As a general matter, unless otherwise stated, we may be a principal or engaged in underwriting securities for which we are providing broker, advisory or other services to our customers. We may also purchase those securities from an affiliate or sell them to an affiliate. In addition, we or our affiliates may act as an investment adviser to issuers whose securities may be sold to Clients.

From time to time, a bank or thrift affiliated with us may lend money to an issuer of securities underwritten or privately placed by us. The prospectus or other offering documentation provided in connection with such underwriting or private placement will disclose to the extent required by applicable securities laws: (i) the existence of any material lending relationship by any affiliate of ours with such an issuer and (ii) whether the proceeds of an issuance of such securities will be used by the issuer to repay any outstanding indebtedness to any of our affiliates.

WFAFN has a number of related persons who may provide investment management and related financial services to our Program Clients. The advisory services these investment advisers offer are described more fully in their Disclosure Documents and/or Form ADV, Part 2A. The identity of these related persons and summary of the products and services follows.

- Wells Fargo also provides retail brokerage and investment advisory services through Wells Fargo Advisors, LLC, FCLLC, H.D. Vest Advisory Services and H.D. Vest Investment Securities, Inc.
- Wells Fargo Funds Management, LLC, is a registered investment adviser and wholly owned subsidiary of Wells Fargo & Company that provides investment advisory services to the Wells Fargo Advantage Funds. These funds may be purchased in WFAFN brokerage Accounts and advisory Programs. Wells Fargo Funds Management, LLC is also an advisor to certain money market sweep vehicles available to Program Clients.
- Wells Capital Management Incorporated, Tattersall Advisory Group, Inc., First International Advisors, LLC, Metropolitan West Capital Management, LLC, and Golden Capital Management, LLC are all affiliates of Wells Fargo & Company and may serve as advisers and/or sub-advisers through WFAFN's Separately Managed Account program and to certain of the Wells Fargo Advantage Funds.
- Alternative Strategies Group, Inc. (formerly known as Wachovia Alternatives Strategies, Inc.), a registered investment adviser and wholly owned subsidiary of Wells Fargo & Company, provides investment advisory services and is the adviser to alternative investments available to Asset Advisor Clients.



The affiliated funds offered through the Programs may have provisions to allow sales through advisors at net asset value. In such cases, the Client understands that there is a potential conflict of interest where the advisor and/or WFAFN offers, recommends, and invests clients in the affiliated funds because, where permitted by law, WFAFN and its affiliates would receive the Program compensation and the compensation for services provided to the fund.

We and our affiliates may give advice and take action in the performance of our duties to Clients that differ from advice given, or the timing and nature of action taken, with respect to other program Clients and/or Clients in other advisory programs. Additionally, we and our affiliates, from time to time, may not be free to divulge or act upon certain information in their possession on behalf of investment banking or other Clients.

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

### **Code of Ethics**

WFAFN associates are subject to a *Code of Ethics* that is designed to ensure our business activities are performed with the highest possible standards of ethics and business conduct, and to comply with all applicable laws, rules, and regulations that govern our businesses. Key requirements of WFAFN's *Code of Ethics* are summarized below, and clients and prospective clients may obtain a complete copy through your Financial Advisor.

- Conduct all aspects of Wells Fargo's business activities in an honest, ethical, and legal manner, and in accordance with all applicable laws, rules, and regulations and our policies and procedures.
- Provide accurate and complete information in dealings with clients and others, including disclosure of conflicts of interest when they exist.
- Prepare and maintain accurate business records
- Refrain from improper disclosure or misuse of confidential client information and material, non-public information. Wells Fargo protects the private, personal, and proprietary information of clients and others.
- Avoid conflicts of interest in personal and business activities.
- Rules specific to personal trading.

### **Participation or Interest in Client Transactions**

With regards to our Financial Planning Services, no specific investment recommendations are made and as a result, no client transactions occur in relation to the Financial Plan. Clients have the choice to implement all or a portion of the plan through WFAFN, however implementation of the plan is not a part of the Financial Planning services provided.

WFAFN has certain restrictions, internal procedures and client disclosures regarding conflicts of interest that we may have with respect to our participation or interest in client transactions. WFAFN communicates its policies and procedures related to participation in client transactions to its associates through its compliance policies and procedure manuals and program-specific policy guidelines.

### **Personal Trading**

WFAFN maintains policies and procedures to mitigate conflicts of interest between transactions in our associates' personal investment Accounts, including Accounts of their immediate family members and transactions in our clients' Accounts. To ensure associate trading requirements are observed, certain associate trading activity is subject to pre-approval. All associates are subject to regular review by their supervisors, independent oversight by WFAFN's Compliance Department, and systemic controls that automatically restrict entry of certain orders and generate related surveillance reporting.

## **Brokerage Practices**

Potential conflicts may arise between Client's interests and ours in executing transactions through us as a broker-dealer if Client chooses to implement all or part of a financial plan through WFAFN. If Client chooses, at Client's sole

discretion, to implement all or part of a financial plan and execute transactions through us, we will act as a broker-dealer, not an investment advisor, unless we have otherwise agreed with Client in writing. As a broker-dealer, we will execute transactions as agent or principal and will charge Client commissions, mark-ups, transaction fees, and/or other charges. These charges are in addition to the Financial Planning fee. The Financial Advisor who presents Client's financial plan is a registered representative of WFAFN and thus will receive a portion of the compensation paid to us in connection with the execution of transactions. This compensation is in addition to the compensation WFAFN and the Financial Advisor receives in connection with preparing and presenting the financial plan. Products recommended by us may include proprietary products of WFAFN or its affiliates. Client should note that we have an incentive to recommend proprietary products because we or our affiliates earn more compensation from the sale of these products than from the sale of non-proprietary products.

WFAFN will not sell client information to other companies for marketing purposes. WFAFN employs strict security standards and safeguards to protect your personal information and prevent fraud. In addition, WFAFN will continue to protect your privacy even if you are no longer our Client.

For more information, please read our Privacy Statement, visit a WFAFN office or call your Financial Advisor. With client's written permission, obtained via client agreement or other written communication, we may provide client information electronically to client's investment adviser and/or agent of such adviser. WFAFN reserves the right, at its discretion, to refuse to provide such requested information. Furthermore, in compliance with our Privacy Policy, we accept client instructions to discontinue providing such information.

## **Review of Accounts**

The services provided under this program represent a one-time financial plan and is not ongoing advice. You may request an updated plan by completing an updated client agreement and you may be subject to an additional fee.

## **Client Referrals and Other Compensation**

We and our affiliates and your Financial Advisor may perform, among other things, investment banking, research, brokerage and investment advisory or management services for other Clients, and may earn transactional compensation, investment advisory or management fees and other consideration for such activities.

From time to time, we initiate incentive programs for Associates including Financial Advisors. These programs may compensate them for attracting new assets and clients, referring business to our affiliates (such as referrals for mortgages, trusts, or insurance services) and promoting investment advisory services. We may also initiate programs that reward Financial Advisors who meet total production criteria, prepare Envision investment plans, participate in advanced training and improve client service.

Financial Advisors who participate in these incentive programs may be rewarded with cash and/or non-cash compensation, such as deferred compensation, bonuses, training symposiums and recognition trips. Portions of these programs may be subsidized by external vendors and/or our affiliates, such as mutual fund companies, insurance carriers, or investment advisers. Therefore, Financial Advisors and other associates may have a financial incentive to recommend the programs and services included in these incentive programs over other available products and services we offer.

We may also enter into arrangements with other persons to whom we pay compensation for referrals to our advisory Programs. This compensation is generally in the form of a percentage of the fees described in the Program contracts. The details of such arrangements and the amount of compensation will be described in a separate disclosure provided at the time of such referrals.

From time to time, we compensate employees other than Financial Advisors for referrals of possible clients to the Programs. Our Financial Advisors, not the referring employee, will make the actual presentation and solicitation of these services. The referral compensation takes the form of a payment to the employee of a percentage of the fees described in the Programs contracts and results in no additional fees to you or other Clients.

We may use our affiliates to effect certain securities transactions. We and our Financial Advisors may affect brokerage transactions and receive commissions from the advisors for Accounts other than those of Program Clients; such commissions may be for other brokerage Account relationships that clients maintain with us, as directed by the particular advisor in connection with its responsibilities and obligations to such other clients.

We do not pre-condition the recommendation of mutual funds for inclusion in our advisory Programs based on any compensation we may receive, with the exception of certain mutual fund clearance and administration fees. In addition, Wells Fargo & Company is a full-service financial services firm with many affiliates. Wells Fargo & Company encourages its subsidiaries to use the products and services offered by affiliated firms, when appropriate. During the course of annual business planning, business with our affiliates is included in establishing our sales goals. As a result, we may have an incentive to hire affiliate service providers for our advisory Programs. We may recommend affiliated mutual funds to Program clients, and may hire other affiliates to provide trade execution, clearing, and platform administration services for the Programs. We intend, however, to make all recommendations independent of any such goals and based solely on our obligations to consider your objectives and needs.

We may receive contributions and/or reimbursements from Program managers and their affiliates for Financial Advisor training and client presentations that have an informational or educational component. Managers that make payments in connection with Financial Advisor training sessions and client presentations generally have increased access to our Financial Advisors and heightened visibility for their products at such meetings. Consequently our Financial Advisors might focus on products offered by such firms when recommending or selecting a money manager and/or mutual fund to Client. We intend, however, to make all recommendations independent of such fee considerations and based solely on our obligations to consider the Clients' objectives and needs. These managers are under no obligation to make such contributions with respect to these Programs.

Unless separately disclosed and if agreed to by you (and then only to the extent permitted by law), our firm will receive no direct monetary benefit from legal, accounting or consulting firms to whom we may refer financial planning Clients. At the same time, it is recognized that firms to whom we have referred financial planning Clients may in the past have recommended and in the future may recommend potential financial planning Clients to us.

## **Custody**

If Client elects to open an account with us to implement all or a portion of the financial plan, WFAFN will have custody of client funds and securities for Program accounts. Accounts are carried by First Clearing, LLC (FCLLC), a qualified custodian. FCLLC is an affiliate owned indirectly by Wells Fargo. Clients will receive brokerage statements directly from FCLLC at least quarterly.

## **Investment Discretion**

WFAFN provides the services described in this brochure on a "non-discretionary" basis, i.e., WFAFN's function is to make recommendations or provide information to Client or Client's agents, and WFAFN does not have authority to cause Client or Client's agents to act upon recommendations made or information provided by WFAFN to Client or Client's agents. Each client will at all times retain the sole discretion to elect whether or not to follow or act upon any recommendation made or information provided by WFAFN or Client's Financial Advisor.

## **Voting Client Securities**

We do not vote on client securities as part of this program.

## **Financial Information**

WFAFN has no financial condition that is likely to impair our ability to meet our contractual commitments to Clients.