

## **Firm Brochure**

(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of WESBAN. If you have any questions about the contents of this brochure, please contact us at: 205.995.7778, or by email at: [Wesban@wesban.com](mailto:Wesban@wesban.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

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

April 9, 2012

## Material Changes

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### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### **Material Changes since the Last Update**

The U.S. Securities and Exchange Commission issued a final rule in July 2010 requiring advisers to provide a Firm Brochure in narrative “plain English” format. The new final rule specifies mandatory sections and organization.

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### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 205.995.7778 or by email at: [Wesban@wesban.com](mailto:Wesban@wesban.com).

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## Advisory Business

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### Firm Description

WESBAN Financial Consultants, P.C., (“WESBAN”) was founded in 1977.

WESBAN provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

WESBAN is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

Investment advice is an integral part of financial planning. In addition, WESBAN advises clients regarding cash flow, college planning, retirement planning, tax planning and estate planning.

Investment advice is provided, with the client making the final decision on investment selection. WESBAN does not act as a custodian of client assets. The client always maintains asset control. WESBAN places trades for clients under a limited power of attorney.

A written evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

The initial meeting, which may be by telephone, 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.

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### Principal Owners

Donna Gordon is a 100% stockholder.

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**Types of Advisory Services**

WESBAN provides investment supervisory services, also known as asset management services. On more than an occasional basis, WESBAN furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, and trust services that often include estate planning.

As of April 14<sup>th</sup>, 2012, WESBAN manages approximately \$42 million in assets for approximately 137 clients. Approximately \$ 0 is managed on a discretionary basis, and \$42 million is managed on a non-discretionary basis.

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**Tailored Relationships**

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

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**Types of Agreements**

The following agreements define the typical client relationships.

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**Financial Planning Agreement**

A financial plan is designed to help the client with all aspects of financial planning without ongoing investment management after the financial plan is completed.

The financial plan 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 fee for a financial plan is predicated upon the facts known at the start of the engagement. The fee range is generally \$1,000 to \$5,000. This schedule is a guideline only. All fees are subject to negotiation at the sole discretion of WESBAN. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, future face-to-face meetings may be scheduled as necessary for up to one month. Follow-on implementation work is billed separately at the rate of \$200 per hour.

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**Advisory Service Agreement**

Most clients choose to have WESBAN manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. Advisory Service Agreement includes:

Assessment of your general risk-tolerance(s) based on the information that you provide and explain how to use your risk-tolerance(s) in structuring an appropriate portfolio for your particular situation and goals.

Assessment of your investment time horizon based on the information that you provide and explain the effect that your investment time horizon has on structuring an appropriate portfolio for you.

Establishment and maintenance of the custodial accounts needed to manage your investment portfolio.

Preparation of an Investment Policy Statement.

Arrange for the custodian (as defined below) to deliver monthly statements of the accounts managed by Wesban that are held at the custodian (individually, an "Account" and, collectively, the "Accounts"), which statements will show, among other things, the month-end balance of, and the monthly activity in, the accounts.

Prepare and explain a recommended asset allocation for your investment portfolio based on the information that you provide us.

Establish periodic investment additions or withdrawals, including required minimum distributions, as requested.

Meet with you, as requested, to review the performance of your investment portfolio and to discuss changes, if any, that may have occurred with respect to, among other things, your personal risk tolerance, your investment time horizon, and your investment goals. We recommend that such a meeting occur at least once per year.

Re-balance your investment portfolio, as requested. We recommend that re-balancing occur no less than once per year.

The annual Advisory Service Agreement fee is based on a percentage of the investable assets according to the following schedule:



1.00% on the first \$500,000;  
0.75% on the next \$1,000,000 (from 500,001 to 1,500,000);  
0.60% on the next \$1,500,000 (from 1,500,001 to 3,000,000);  
0.50% on the assets above \$3,000,001.

This schedule is a guideline only. All fees are subject to negotiation at the sole discretion of WESBAN.

The minimum annual fee is \$1000 and is negotiable at the sole discretion of WESBAN. Current client relationships may exist where the fees are higher or lower than the fee schedule above.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio value at the completion of the prior full billing quarter is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

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### **Additional Services**

From time to time Wesban may agree to provide , additional services that are outside the scope of the Initial Services (the "Additional services", and together with the Initial Services, collectively, the "Advisory Services"); provided, however, that any such agreement (an "Additional Agreement") must be in writing. If an Additional Agreement contains any terms or conditions that conflicted with or contradict the initial Agreement, then the terms and conditions in the initial agreement shall control. Additional Services are billed at our normal hourly rate, \$200 per hour.

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### **Asset Management**

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, usually through discount brokers or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Discount brokerages may charge a transaction fee for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The brokerage firm charges a fee for stock and bond trades. WESBAN does not receive any compensation, in any form, from fund companies.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships.

Initial public offerings (IPOs) are not available through WESBAN.

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**Termination of Agreement**

A client may terminate any of the aforementioned agreements at any time by notifying WESBAN in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. If the client made an advance payment, WESBAN will refund any unearned portion of the advance payment.

WESBAN may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, WESBAN will refund any unearned portion of the advance payment.

## **Fees and Compensation**

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**Description**

WESBAN bases its fees on a percentage of assets under management, hourly charges, and flat fees.

Financial plans are priced according to the degree of complexity associated with the client's situation.

All fees are subject to negotiation at the sole discretion of WESBAN.

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**Fee Billing**

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the three-month billing period has ended. Payment in full is expected upon invoice presentation. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

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**Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more

important than the nominal fee that the custodian charges to buy or sell the security.

WESBAN, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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**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 0.50 means that the mutual fund company charges 0.5% for their services. These fees are in addition to the fees paid by you to WESBAN.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

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**Past due Accounts and Termination of Agreement**

WESBAN reserves the right to stop work on any account that is more than 30 days overdue. In addition, WESBAN reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in WESBAN's judgment, to providing proper financial advice. Any unused portion of fees collected in advance will be refunded within 10 days.

## Performance-Based Fees

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**Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

WESBAN 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.

## Types of Clients

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**Description**

WESBAN generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

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**Account Minimums**

The minimum account size is \$100,000 of assets under management, which equates to an annual fee of \$1000.

When an account falls below \$80,000 in value, the minimum annual fee of \$1,000 is charged.

Depending upon circumstances, WESBAN will sign an Hourly Agreement with the client if assets have diminished significantly below \$50,000.

WESBAN has the discretion to waive the account minimum. Accounts of less than \$100,000 may be set up when the client and the advisor anticipate the client will add additional funds to the accounts bringing the total to \$100,000 within a reasonable time. Other exceptions will apply to employees of WESBAN and their relatives, or relatives of existing clients.

Clients receiving ongoing asset management services will be assessed a \$1,000 minimum annual fee. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

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

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**Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that WESBAN may use include Morningstar mutual fund information, TD Ameritrade's Advisor Services, Google Finance, and the World Wide Web.

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**Investment Strategies**

The primary investment strategy used on client accounts is strategic asset allocation. This means that we generally use active, passive, and exchanged traded funds as core investments. Portfolios are globally diversified to control the risk associated with traditional markets.

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time.

Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchase and short-term purchases.

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**Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress,

the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## Disciplinary Information

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### Legal and Disciplinary

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

## Other Financial Industry Activities and Affiliations

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### Financial Industry Activities

N/A

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### Affiliations

N/A

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

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### Code of Ethics

The employees of WESBAN have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

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### Participation or Interest in Client Transactions

WESBAN and its employees may buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the WESBAN *Compliance Manual*.

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### Personal Trading

The Chief Compliance Officer of WESBAN is Eric McClain. He/she reviews all employee trades each quarter. His/her trades are reviewed by Donna Gordon. 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. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## Brokerage Practices

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### Selecting Brokerage Firms

WESBAN does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. WESBAN recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

WESBAN does not receive fees or commissions from any of these arrangements.

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### Best Execution

WESBAN reviews the execution of trades at each custodian each quarter. The review is documented in the WESBAN *Compliance Manual*. Trading fees charged by the custodians is also reviewed on a quarterly basis. WESBAN does not receive any portion of the trading fees.

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### Soft Dollars

WESBAN is compensated solely by fees paid by clients and is not party to any soft-dollar arrangements.

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### Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

## Review of Accounts

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### Periodic Reviews

Account reviews are performed at least annually by Donna Gordon, CFP® President and Eric J McClain, CFP®. Account reviews are performed more frequently when market conditions dictate.

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### Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation. Account reviewers are members of the firm's Investment Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client.

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**Regular Reports**

Clients receive periodic communications on at least an annual basis. The written updates may include a net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives.

## **Client Referrals and Other Compensation**

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**Incoming Referrals**

WESBAN has been fortunate to receive many client referrals over the years. The referrals came from current clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

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**Referrals Out**

WESBAN does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

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**Other Compensation**

N/A

## **Custody**

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**Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

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**Performance Reports**

Clients are urged to compare the account statements received directly from their custodians to the fund report and/or performance report statements provided by WESBAN.

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**Net Worth Statements**

Clients may be provided net worth statements and net worth graphs that are generated from our client relationship management system. Net worth statements contain approximations of bank account balances provided by the client, as well as the value of land and hard-to-price real estate. The net worth statements are used for long-term financial planning where the exact values of assets are not material to the financial planning tasks.



## Investment Discretion

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### Discretionary Authority for Trading

WESBAN consults with the client prior to each trade to obtain concurrence.

The client approves the custodian to be used and the commission rates paid to the custodian. WESBAN does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

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### Limited Power of Attorney

A limited power of attorney is a trading authorization for this purpose. You sign a limited power of attorney so that we may execute the trades that you have approved.

## Voting Client Securities

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### Proxy Votes

WESBAN does not vote proxies on securities. Clients are expected to vote their own proxies.

## Financial Information

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### Financial Condition

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

A balance sheet is not required to be provided because WESBAN does not serve as a custodian for client funds or securities, and does not require prepayment of fees.

## Business Continuity Plan

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### General

WESBAN has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

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### Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency,

chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

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**Alternate Offices**

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

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**Loss of Key Personnel**

WESBAN has an internal agreement so that either Donna Gordon or Eric McClain could continue the business without interruption.

## **Information Security Program**

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**Information Security**

WESBAN maintains an information security program to reduce the risk that your personal and confidential information may be breached.

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**Privacy Notice**

WESBAN is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service

companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this *Privacy Notice* to you annually, in writing.

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**Education and Business Standards**

WESBAN requires that advisors in its employ have a bachelor's degree or equivalent experience and further coursework demonstrating knowledge of financial planning and tax planning. Examples of acceptable coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, EA or CPA. Additionally, advisors must have work experience that demonstrates their aptitude for financial planning and investment management.

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**Professional Certifications**

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board ([www.cfp.net](http://www.cfp.net)).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

NAPFA Registered Financial Advisor:

NAPFA-Registered Financial Advisor® is the top level of membership in the National Association of Personal Financial Advisors (NAPFA). All NAPFA-Registered Financial Advisors® must have three years of comprehensive financial planning experience, have a sample comprehensive financial plan pass a peer review process. All NAPFA-Registered Financial Advisors® must also adhere to NAPFA's Fiduciary Oath, Standards of Membership and Affiliation, and Bylaws. NAPFA-Registered Financial Advisors must also comply with NAPFA's industry-leading strict continuing education requirements of sixty hours every two years. All NAPFA-Registered Financial Advisors® provide investment and/or financial advice on a strictly Fee-Only basis as defined by NAPFA, and continue to meet NAPFA's standards for strong character and adherence to the laws and regulation governing the profession.

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**Donna Gordon, CFP® NAPFA Registered Financial Advisor®****Educational Background and Business Experience:**

- Date of birth: 09/27/1954
- University of Alabama in Birmingham, 1985-1989, various courses.
- Certified Financial Planner™ for Wesban Financial Consultants from 1986 to present.
- President of Wesban Financial Consultants: 01/01/01 to present.

Disciplinary Information: N/A

Other Business Activities: N/A

Additional Compensation: N/A

Supervision: N/A

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**Eric J. McClain, CFP® NAPFA Registered Financial Advisor®****Educational Background and Business Experience:**

- Date of birth: 05/19/1976
- University of Alabama, 2005, B.S. in Financial Planning
- Vice President and Certified Financial Planner™ for Wesban Consultants, P.C. 08/03/2009 - present.
- Inside Sale Representative, Altec Worldwide, 10/2008 -10/2009
- Clark Financial Planning, Certified Financial Planner™, 04/2008-08/2008
- Fee-Only Planning Professionals, Certified Financial Planner™, 08/2005-04/2008

Disciplinary Information: N/A

Other Business Activities: N/A

Additional Compensation: N/A

Supervision: N/A