

**Item 1 – Cover Page**

Wealth Advisors Network, Inc.

5807 Osborne Drive West

Hastings, NE 68901

402-463-6711

[www.capc.com/wan/](http://www.capc.com/wan/)

March 27, 2012

This Brochure provides information about the qualifications and business practices of Wealth Advisors Network, Inc. (WAN) as required by Part 2A of Form ADV. Form ADV is the form we file to register and be licensed to do business as investment advisers and comply with federal and/or state securities laws. The information presented is responsive according to the sequential “Items” of the form. Please contact our Chief Compliance Officer, Jeni Samples, if you have questions about the contents of this Brochure. 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.

We are a registered investment adviser with the states of NE, CO, and TX. Our registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications we provide to you, including this Brochure, is information you use to evaluate us (and other advisers) which are factors in your decision to hire us or to continue to maintain a mutually beneficial relationship.

## **Item 2 – Material Changes**

If you have been a client in the past, you have been provided a copy of what was called Part II of Form ADV (“Old Part II”). Instead of providing that to you, new rules require us to provide you with this new “Brochure” which contains much of the same information contained in the Old Part II, but it is now in a plain English format and hopefully easier to read and understand. It also contains some additional disclosures not specifically required by the Old Part II but required by the new rules. As a result, this entire “Brochure” should be considered “materially new” to existing clients, although you will recognize most of the disclosures as similar or identical to what you have read in the past. In future versions of the Brochure, this section of the Brochure will address only those “material changes” that have been incorporated since our last amendment. We may, at any time, update this Brochure, and if we do, we will either send you a copy or offer to send you a copy (either by electronic means such as email, or in hard copy form). If you would like another copy of this Brochure, please download it from the SEC Website as indicated above or you may contact our Chief Compliance Officer, Jeni Samples at 402-463-6711 or [compliance@capc.com](mailto:compliance@capc.com). Our Brochure is also available on our web site [[www.capc.com/wan](http://www.capc.com/wan)], free of charge.

Additional information about Wealth Advisors Network, Inc. is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Wealth Advisors Network, Inc who are registered, or are required to be registered, as investment adviser representatives of Wealth Advisors Network, Inc.

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## **Item 4 – Advisory Business**

Wealth Advisors was established in 1997 to provide comprehensive wealth care services. Many of our adviser representatives (“IARs”) are registered representatives of 1<sup>st</sup> Global Capital Corp, a registered broker/dealer and member of FINRA, are licensed to sell insurance and are also certified public accountants (CPAs) with Contryman Associates, P.C., or other CPA firms. Wealth Advisors is located in Hastings, Nebraska and is wholly owned by Contryman Associates, P.C., a certified public accounting firm located in Grand Island, Nebraska (“Contryman”). Contryman has offices throughout central Nebraska. Drawing on other institutional resources, such as 1<sup>st</sup> Global, we develop and implement customized investment strategies for high net worth individuals, charitable organizations, trusts and closely-held businesses. Our independence allows us the ability to utilize a variety of investment approaches including institutional funds and other mutual funds, ETFs and separate account managers.

Our main service and goal is to provide sound, quality investment supervisory services. Most of our business is derived from this. The rest of our business is comprised of furnishing advice to clients on financial matters that may not involve securities, including, income planning and asset preservation, insurance and general business planning. Through Contryman, clients may also receive a variety of other services that may overlap our investment advisory and other services including general accounting and traditional CPA services.

We offer a variety of financial planning and investment advisory services to our clients. Depending on the program or options our clients have selected, the services may be provided on a discretionary basis or non-discretionary basis. Through 1<sup>st</sup> Global we make available to clients investment programs that use managers whose investment style and expertise may be appropriate for the specific needs of certain clients. We work hard to fully explain the options available to our clients and advise them to carefully examine the various investment programs and underlying options available, particularly the fee structure. We are aware that services provided under some or all of the options may be available from other providers for lesser or higher fees.

We are a regional, community-based firm positioned to provide top quality local service and value, with immediate availability and accessibility. You will have the assurance that qualified professionals are taking into account your entire financial picture and know that your financial plan has been designed and

customized to meet your specific needs. Our independent in-depth research and advice are provided by advisors with breadth of knowledge evidenced by years of experience and training. This allows us to provide you with the best of both worlds: local availability and value with the depth of a national firm.

We and our IARs offer discretionary and nondiscretionary investment management services, including giving continuous advice to clients based on their individual needs through accounts and separate account managers normally maintained with 1<sup>st</sup> Global. National Financial Services LLC (NFS) maintain custody of all funds and securities and we will never have direct access to client funds and securities.

Wealth Advisors offers the WAN Flex Choice Program and the IMS Portfolio Choice Program

In the WAN Flex Choice Program the IAR of WAN determines the appropriate mix of assets for the client based on the results of the Risk Profile Questionnaire. Investments can include, but are not limited to, money market funds, mutual funds, institutional mutual funds, stocks, bonds, unit investment trusts, ETFs, and certificates of deposit. WAN has developed recommended portfolios based on risk tolerance that the adviser may use but not required to use. For non-discretionary accounts, the IAR will monitor market conditions and the portfolio and will obtain client approval for repositioning the assets. For discretionary accounts, the IAR will monitor market conditions and the portfolio and will reposition the assets when needed.

In the IMS Portfolio Choice Program the IAR will determine the appropriate mix of assets for the client based on results of the Risk Profile Questionnaire. Investments generally consist of, but not limited to, money market funds, mutual funds, and ETFs. Client's portfolio may be invested similar to, or different from, other clients with the same or similar objectives. IMS portfolios will be managed on a discretionary basis. WAN will have the authority to automatically rebalance the account according to the agreed upon target allocation and rebalancing schedule. Neither the adviser nor IAR will have the authority to withdraw funds nor securities from the client's account other than for payment of quarterly management fees as agreed to in writing by the client. Special rebalancing considerations will be made for those accounts incorporating an allocation to the PPN. This product is available in 3 and 5 maturities. As such, the portion of the client's account allocated to the asset allocation will be rebalanced independent of the PPN portion of the account.

We also can offer advice in the form of a financial plan. Clients will receive a detailed, written financial plan designed to help the client pursue their stated financial goals and objectives. In general, the financial plan will address any or all of the following areas:

- **PERSONAL:** Family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** Income tax and spending analysis and planning for past, current and future years. We may illustrate the impact of various investments on a client's current income tax and future tax liability.
- **DEATH & DISABILITY:** Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- **RETIREMENT:** Analysis of current strategies and investment plans to help the client achieve his/her retirement goals.
- **INVESTMENTS:** Analysis of investment alternatives and their effect on a client's portfolio.

We typically gather required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes toward risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Normally, the financial plan will be presented to the client within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the client.

Should a client choose to implement the recommendations contained in the financial plan, we suggest the client work closely with his/her attorney, accountant, insurance agent and/or stockbroker. Implementation of the recommendations contained in the financial plan is entirely at the client's discretion. To the extent that we or our affiliates offer accounting or insurance, a client is not obligated to use our affiliate to obtain such services. If the client chooses to use us or our affiliate for any such services, we could have a potential conflict of interest in evaluating product recommendations involving advisory services or products offered by them.

More typically, our clients receive investment advice from us on a more limited, generic basis. This may include advice on only an isolated area or areas of concern such as estate planning, retirement planning or any other specific topic. WE also offer specific consultation and administrative services regarding investment and financial concerns of the client. Additionally, we provide advice on non-securities matters. Generally, this is in connection with the rendering of estate planning, insurance and/or annuity advice.

Financial plan/issue consulting recommendations are of a generic nature and do not generally involve the recommendation of specific investment products. Recommendations are not limited to any specific product or service offered by a broker/dealer or insurance company.

We will review various investments, consisting primarily of stocks, bonds and mutual funds (both index and actively managed) to determine which of these investments may be appropriate to implement the client's plans. The number of investments to be recommended will be determined by the client.

For pension, profit sharing and 401(k) Plan clients that have individual accounts with participants exercising control over assets in their own account, we may, at the request of the Plan trustees, conduct educational investment meetings designed for Plan participants. The nature of the topics to be covered will be determined by us and the client under the guidelines established in ERISA Section 404(c). These meetings will NOT provide Plan participants with individualized, tailored investment advice or individualized, tailored asset allocation recommendations.

Our investment strategies utilize primarily no-load mutual funds (both index and actively managed), as well as exchange-traded funds (ETFs) and, in some instances, individual stocks and bonds. On those occasions where it is in the client's best interest to invest in a fund or security with a front-load (commission), we may waive those fees to at our discretion. As registered representatives of 1<sup>st</sup> Global our IARs could also receive compensation from mutual fund sales loads, 12(b)-1 distribution fees, variable annuity sales commissions or trail commissions. The 12(b)-1 distribution fees, sales charges and other fee arrangements will be disclosed at the point of sale are typically described in the applicable fund and/or annuity prospectus, and in suitability/application forms required by 1<sup>st</sup> Global. As registered representatives, our IARs can sell securities to any client for commissions. However, we do not engage in securities transactions where our IAR would receive a commission when we have already charged an advisory management fee. Any fees or other compensation received by the IARs in their separate capacities as registered representatives will be received to the extent permitted by applicable law.

Because of these compensation arrangements, a conflict of interest could exist in connection with the IARs recommending particular investments for a client's account. Clients have sole discretion whether to implement any or all of the IARs' recommendations. In addition, clients are free to select any broker/dealer they wish to implement recommendations and all efforts will be made to put the interests of the client first.

As of March 8, 2012, we manage client assets on a discretionary basis in an amount equal to approximately \$16,983,175.00 and client assets on a non-discretionary basis in an amount equal to approximately \$72,806,460.00.

## 5 – Fees and Compensation

**Fees for services are based on the program that we use to manage your assets and or are negotiated with you.**

### **WAN Flex Choice**

#### **Portfolio Choice**

The Annual Advisory Fees payable to us for this program range from .50% (50 basis points) up to 1.750% (175 basis points) based on the amount of assets under management for each client as set forth in the table below.

Less than \$100,000	1.60%
\$100,000 - \$249,999	1.50%
\$250,000 - \$499,999	1.45%
\$500,000 - \$999,999	1.35%
\$1,000,000 - \$1,999,999	1.20%
\$2,000,000 - \$2,999,999	1.05%
\$3,000,000 - \$3,999,999	.95%
\$4,000,000 - \$4,999,999	.85%
\$5,000,000 - \$5,999,999	.80%
\$6,000,000 - \$6,999,999	.75%
\$7,000,000 - \$7,999,999	.70%
\$8,000,000 - \$9,999,999	.65%
Over \$10,000,000	.60%

#### **IMS Portfolio choice**

The Annual Advisory Fees payable to us for this program range from .50% (50 basis points) up to 3.0% (300 basis points) based on the amount of assets under management for each client as set forth in the table below.

Through 1st Global Advisors, Inc., WAN can offer the Unified Choice Platform which is a wrap fee type of account. For clients opting to participate in this account the wrap fee platform brochure will also be provided.

### **Negotiation of Fees:**

The fee schedules set forth above are guidelines and all fees are negotiable. The actual fee for each client is based on factors such as the client's financial situation and circumstances, the amount of assets under management and the time required to manage the account. The exact fee for our services will be discussed and agreed upon and be included in a written agreement for services prior to services being provided.

### **Additional Fees and Expenses:**

Our Fees are in addition to certain transaction costs, fees and charges, which are not commissions or sales charges, related to account services provided by 1<sup>st</sup> Global and the other service providers related to your account, including the custodial charges. In some cases we and or our IAR may elect to assume the cost of these



transaction charges under certain circumstances as negotiated with the client. The following transaction costs may apply:

- Mutual Funds/Equity, ETF – no more than \$15.00 per trade
- Fixed Income – no more than \$39.50 per transaction
- UIT – no more than \$35.00 per trade
- Foreign Equity – no more than \$90.00 per trade
- Annual IRA Fee: \$35.00. Applicable to Traditional, Roth, SIMPLE, SEP, BDA, and PSP registrations. The fee for a Traditional IRA will be waived if the same client also has a Roth IRA with National Financial Services (NFS, our custodian).
- Annual Inactivity Fee: \$35.00. Applicable to non-retirement accounts. There are several waivers to this fee. Retirement and Advisory accounts will not be assessed this fee in addition to accounts with Core values in excess of \$10,000.

Advisory fees payable to us do not include all the costs you will pay when we purchase or sell securities for your Account(s). The following list of costs, fees or expenses are what you pay directly to third parties, whether a security is being purchased, sold or held in your Account(s) under our management. These fees are charged by the broker dealer / custodian. We do not receive, directly or indirectly any of these fees charged to you. They are paid to your broker, custodian or the mutual fund or other investment you hold. The costs may include:

- Transaction fees;
- Exchange fees;
- SEC fees;
- Advisory fees and administrative fees charged by Mutual Funds (MF), Exchange Traded Funds (ETFs)
- Advisory fees charged by sub-advisers (if any are used for your account);
- Custodial Fees;
- Odd-Lot differentials;
- Transfer taxes;
- Wire transfer and electronic fund processing fees;
- Commissions or mark-ups / mark-downs on security transactions;

In addition, we do not have or employ any “Employee” that receives (directly or indirectly) any compensation from the sale of securities or investments that are purchased or sold for your account or to which we provide consulting expertise / services. As a result, we are a “fee only” investment adviser.

Financial Planning or other advisory services may be provided at a flat rate or hourly rate that is determined by the complexity of the service provided.

## **Billing:**

If a client has more than one portfolio with each program under our services, we may elect at our sole discretion to aggregate the client's portfolios for the purposes of computing management fees.

Upon initial implementation of the portfolio, Advisory Fees may be charged based upon the proportional number of days remaining in the quarter. Thereafter, fees will be charged quarterly based on the value of the portfolio on the last business day of the prior quarter or the date the custodian values the portfolio for the month-end statement at the end of the prior quarter. The value of the portfolio generally includes the value of all securities held in the account with the exception of non-billable assets. This includes the value of the money market mutual fund held in the account, unless the amount is significant and the client has agreed otherwise. Advisory Fees are payable at the end of the prior quarter and are generally taken directly from the client's account. The Advisory Fees payable upon initial implementation of the account are payable by the client upon receipt of an invoice from the adviser or collected directly from the account. If the account does not contain sufficient funds to pay Advisory Fees, WAN and or 1st Global Advisors, Inc. or 1st Global Securities Corp. has limited authority to sell or redeem securities in sufficient amounts to pay the Advisory Fees. The client may elect to pay fees directly to WAN instead of having fees taken directly from their portfolio. For clients that have chosen to pay quarterly fees upon receipt of a statement and who have not paid the fees within 45 days, fees will be debited from the account. If the account fees have not been paid twice, the account will be changed to have the fees automatically debited each quarter

An investment advisory agreement may be terminated by either party by providing written notice to the other party. Termination will be effective when the termination letter is received by the other party. If services are terminated within five business days of executing the agreement, services will be terminated without penalty and all pre-paid fees will be refunded to the client. If services are terminated after the initial five day period, any unearned fees will be prorated and refunded to the client.

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

We do not charge performance based advisory fees on a share of the capital appreciation of the client's account. .

## **Item 7 – Types of Clients**

We provide our services to a number of Clients:

- Individuals, including high net worth individuals and business owners
- Trusts, estates and charitable organizations
- Corporations or other business entities
- Pension and profit sharing plans
- Certain schools, government entities, and nonprofit organizations

**Minimum Account Size:**

WAN has a \$100,000 minimum balance requirement for new accounts in order to manage a portfolio for the WAN Flex Choice Program. WAN may choose to waive these minimums at its sole discretion as circumstances dictate.

The minimum initial investment in the IMS Portfolio Choice Platform is \$30,000.

We otherwise do not have a minimum account size; however accounts under \$30,000 may not be cost effective to the client and are discouraged.

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

**Analysis:**

Security analysis techniques used will vary depending on the needs of the client and the advice requested in a given situation. Any or one of the following: charting, fundamental, technical, and cyclical. The security analysis technique or techniques used will vary depending on the needs of the client and the advice requested in a given situation. Then, using modeling and research software, we filter for available ETFs, load and no load funds that meet our predetermined parameters (that may change over time based on portfolio goals) such as the Sharpe ratio, expenses, returns, past performance, size, rank among peers, price-to-earnings ratios (P/E's), asset class, industry, sector, financial strength, etc. We also will look at past style drift and manager tenure to help estimate consistency in future performance. Various tools will be used for research including; prospectuses, charting software, market news, fund websites, and other information that may become available that is useful and legal.

**Investment Strategies:**

WAN's investment philosophy is based on the principles of diversification, relative value versus risk, and active portfolio management. Diversification is a portfolio strategy designed to reduce exposure to risk by combining a variety of investments, such as stocks, corporate debt, commercial paper, U.S. government securities, municipal securities, mutual funds, ETFs, mortgage related and other asset backed securities, REITS, and DPPs, which are less likely to generate parallel returns at the same time.

In addition, Modern Portfolio Theory teaches that a long-term investment strategy should not focus on short-term results and should not necessarily avoid "risky" investments.

Modern Portfolio Theory also states that no investments are "always" imprudent. Rather, research demonstrates that investment returns correlate strongly with risk and that it is only by accepting "risk" into the portfolio and satisfactorily diversifying the portfolio of investments that the owner can truly grow, preserve, and protect against taxes and inflation in his or her portfolio.

Because risk and return are linked, we believe our main task is not to avoid risk but to manage it prudently: in other words, to define risk and return objectives reasonably suited to the client account and to evaluate and make decisions respecting asset classes and individual securities in the context of the portfolio a whole.

### **Risk of Loss:**

All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized (securities not yet sold that reflect gains). As you know, stock and bond markets fluctuate substantially over time. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. You should understand and be prepared to face losses and be able to bear them. If you cannot, then our services are probably not appropriate for you. While we believe that our strategies will provide opportunities for growth in account value and protect from loss, we cannot assure that our approaches will work. As a result, there is a risk of loss of the value of the assets we manage that may be out of our control. We will do our very best with the management of your assets; however, we cannot guarantee any level of performance or that you will not experience losses.

## **Item 9 – Disciplinary Information**

WAN and its management persons have not been subject to any disciplinary actions in the past ten years or otherwise that are material to the business of WAN.

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

WAN is also a licensed insurance agency. Our IAR's that are licensed to sell insurance, spend a portion of their time on analysis of existing policies for clients, and when needed, researching and recommending insurance products to clients.

The primary business of Contryman Associates, P.C., WAN's parent company, is certified public accounting and related services. Some of Our principals, executives, IARs and employees spend a portion of their time on activities associated with this business.

Most of our IARs are also registered representatives of 1st Global Capital Corp., a registered broker-dealer, Member FINRA/SIPC. Clients are under no obligation to purchase or sell securities through our Investment Advisor Representatives. Commissions may be higher or lower at 1st Global than at other broker-dealers. Advisory representatives may have a conflict of interest in having clients purchase securities and or insurance related products through 1st Global in that the higher their production with 1st Global, the greater the opportunity to obtain a higher payout on commissions earned. Further, advisory representatives are restricted to only offering those products and services that have been reviewed and approved for offering to the public through 1st Global Capital Corp. for execution. Registered persons may earn reasonable and customary commissions and/or 12b-1 fees on the sale of insurance, advisory and/or securities products to clients. The commissions will be outlined in the product's prospectus or offering document or described in detail before the product is sold.

Advisory representatives may be certified public accountants with Contryman Associates, P.C. and may also offer various accounting services for a fee. Clients are advised that fees for accounting services may be in addition to fees paid for advisory services. The clients to whom WAN's provides advisory services frequently are the same as to whom Countryman Associates, P.C. provides accounting services.

### **Additional Compensation:**

WAN and/or its IAR's may receive client referrals from outside solicitors (usually attorneys, CPAs and/or other professionals). The solicitor may receive a portion of the fee charged to a client, but in no event will the client be charged additional fees to offset those paid to a solicitor. If payment is made to solicitors, proper licensing (if required by states or other regulatory agencies) will be maintained by solicitors and full disclosure will be made to the client in writing.

## **Item 11 – Code of Ethics**

We have imposed restrictions upon ourselves or any person associated with us in connection with the purchase or sale, directly or indirectly, for their own account or accounts controlled by them, of securities recommended to or purchased for clients. We maintain strict guidelines and a Code of Ethics for all our employees designed to assure that we, or persons associated with us, may not benefit, directly, or indirectly, from transactions made for the accounts of clients and that no other conflict of interest exists.

Employees are prohibited from investing in Initial Public Offerings (IPO's). IAR's, our officers, and our employees are not allowed to trade ahead of clients when purchasing like securities (as defined in Section 2(a) (36\_ of the Investment Company Act of 1940). A copy of our “Code of Ethics” is available upon request.

### **Prohibition on Use of Insider Information**

We have also adopted policies and procedures to prevent the misuse of “insider” information (material, non-public information). A copy of such policies and procedures is available to any person upon request.

## **Item 12 – Brokerage Practices**

### **General Considerations – selecting / recommending brokers for Client transactions and commission charges:**

WAN will recommend 1st Global Capital Corp. and its clearing firm, National Financial Services, LLC, as the broker-dealer and custodian for advisory accounts. 1st Global Capital Corp. or National Financial Services, LLC transmits customer orders for execution to various exchanges or market centers based on a number of factors. These include size of order, trading characteristics of the security, favorable execution prices (including the opportunity for price improvement), access to reliable market data, availability of efficient automated transaction processing and reduced execution costs through price concessions from the market centers. Certain market centers may execute orders at prices superior to the publicly quoted market price in accordance with their rules or practices WAN receives a best execution analysis quarterly to review execution within spread, price improvement, and execution speed.

### **Research and Other Soft Dollar Benefits:**

WAN does not use soft dollars arrangements.

**We do not direct Brokerage for Client Referrals.**

**Item 13 – Review of Accounts**

Accounts are marked to market daily and the account is reviewed at least annually by the Chief Compliance Officer of WAN or other designated employees of WAN for compliance with the clients written investment policy statement and verification of authorized trades. Client accounts, including positions held within those accounts, are reviewed periodically throughout the year. We meet with clients quarterly, semiannually, or annually, as mutually agreed and as schedules allow

To the extent that your investments are held through 1st Global Capital Corp., or any of its affiliates, and custody is held at NFS, NFS will provide you monthly and annual written statements showing the activity in the account, positions owned, and period end market values, unless there is no activity in your account, in which case the statements shall be delivered quarterly. WAN will also provide you with written quarterly performance reports.

**Item 14 – Client Referrals and Other Compensation**

Contryman Associates, P.C. is a public accounting and consulting firm and our parent company. Our IARs and other associated persons may also be separately employed as officers or CPAs or may be owners of Contryman. Clients may be referred between us and Contryman; however, clients are under no obligation to use the services of the other firm. While employees of Contryman are not paid a direct fee based on the actual referrals made to us, Contryman benefits from the referral arrangement due to its direct ownership of Contryman.

The foregoing relationships and affiliations may result in conflicts of interest that may affect the independent judgment of us or our IARs. Material conflicts of interest will be disclosed to clients in writing and all efforts will be made to put the interest of the client first.

WAN and/or 1st Global Advisors, Inc. may receive compensation from unaffiliated financial institutions on those assets placed with qualified portfolio managers under 1st Global's Solicitor Referral Platform. Currently, WAN receives compensation on the assets placed with qualified portfolio managers through these financial institutions.

WAN and/or its IARs may receive client referrals from outside solicitors (usually attorneys, CPAs, or other professionals). The solicitor may receive a portion of the fees charged to the client, but in no event will the client be charged additional fee to offset those paid to the solicitor. Proper licensing (if required by the states) will

be maintained by the solicitors and full disclosure will be made to the client in writing.

### **Item 15 – Custody**

We do not have custody of our client's assets.

### **Item 16 – Investment Discretion**

WAN shall not have sole and absolute discretion in the management of client's portfolio (for all programs other than WAN Flex Choice and IMS Portfolio Choice where discretion has been authorized by the client).

### **Item 17 – Voting Client Securities (i.e., Proxy Voting)**

WAN will not vote or give advice about how to vote proxies for securities held in client accounts.

### **Item 18 – Financial Information**

Not applicable.