

Part 2B of Form ADV: *Brochure Supplement*

David Sheldon Coles

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This brochure supplement provides information about David Sheldon Coles that supplements the Wealth Management and Business Concepts brochure. You should have received a copy of that brochure. Please contact David Coles if you did not receive Wealth Management and Business Concepts' brochure or if you have any questions about the contents of this supplement.

Additional information about David Sheldon Coles is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. The CRD number for David Sheldon Coles is 5379727.

Item 2 Educational Background and Business Experience

Full Legal Name: David Sheldon Coles **Born:** 1984

Education

- University of Phoenix; B.S, Business Management emphasis in Marketing; 2010

Business Experience

- Wealth Management & Business Concepts, Chief Compliance Officer, 2010 to Present
- Valmark Securities, Inc., Registered Representative, 2007 to Present
- All Star Production, Event planner, 2001 to 2006

Item 3 Disciplinary Information

David Sheldon Coles has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

David Coles is separately licensed as a registered representative of Valmark Securities, Inc., an unaffiliated FINRA member broker-dealer. Mr. Coles, in this separate capacity, can effect securities transactions for which he will receive separate, yet customary compensation.

Mr. Coles is also an insurance agent for various insurance companies. As such, Mr. Coles is able to receive separate, yet customary commission compensation resulting from implementing insurance product transactions on behalf of advisory clients. Clients, however, are not under any obligation to engage Mr. Coles when considering implementation of insurance recommendations. The implementation of any or all recommendations is solely at the discretion of the client.

While Mr. Coles endeavors at all times to put the interest of the clients first as part of his fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect his judgment when making recommendations.

Clients should be aware that the receipt of additional compensation by Mr. Coles creates a conflict of interest that may impair his objectivity when making advisory recommendations. Mr. Coles endeavors at all times to put the interest of his clients first

as part of his fiduciary duty as a registered investment adviser representative; he takes the following steps to address this conflict:

- discloses to clients the existence of all material conflicts of interest, including the potential for him to earn compensation from advisory clients in addition to the firm's advisory fees;
- discloses to clients that they are not obligated to purchase recommended investment products from affiliated companies or him;
- collects, maintains and documents accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- requires that employees seek prior approval of any outside employment activity so that he can ensure that any conflicts of interests in such activities are properly addressed;
- periodically monitors these outside employment activities to verify that any conflicts of interest continue to be properly addressed by the firm; and
- educates employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

David Coles devotes approximately 25% of his time on these other business activities.

B. Non Investment-Related Activities

David Coles is not involved in any non investment-related activities.

Item 5 Additional Compensation

David Sheldon Coles does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

David Scott Coles, President of Wealth Management & Business Concepts, is responsible for the supervision and monitoring of investment advice offered to advisory

clients by David Sheldon Coles. He can be reached at (949) 829-9622. Mr. Coles will review all employee personal securities transactions on a quarterly basis, oversee all material investment policy changes, and conduct periodic testing to ensure that client objectives and mandates are being met.

Item 7 Requirements for State-Registered Advisers

David Sheldon Coles has never been the subject of a bankruptcy petition nor has he ever been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.