

**Item 1 – Cover Page**

# Wilcox Investment Inc.

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Newton, MA 02459

Tel. 617-332-4666

[www.wilcoxinvest.com](http://www.wilcoxinvest.com)

March 18, 2013

This Brochure provides information about the qualifications and business practices of Wilcox Investment Inc. If you have any questions about its contents, please contact us at 617-332-4666 and/or [jwilcox@wilcoxinvest.com](mailto:jwilcox@wilcoxinvest.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.

Wilcox Investment Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

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

## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated March 22, 2013 is prepared according to the SEC’s requirements and rules as updated since the previous Brochure dated March 22, 2012. In summary, there are no material changes since the 2012 version.

Pursuant to SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Jarrod Wilcox, President, at 617-332-4666 or [jwilcox@wilcoxinvest.com](mailto:jwilcox@wilcoxinvest.com).

Additional information about Wilcox Investment 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 Wilcox Investment Inc. who are registered, or are required to be registered, as investment adviser representatives of Wilcox Investment Inc.

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#### **Item 4 – Advisory Business**

Wilcox Investment Inc has been in business since December, 2001. The principal owner is Jarrod W. Wilcox.

Our services include the following.

1) Comprehensive Portfolio Supervision -- This service is primarily intended for private individuals with substantial financial resources desiring long-term, flexible, and customized attention. It may include adviser advice with respect to outside managers, and does included advice as to asset allocation as well as direct investment management. Direct investment management includes only selection and management of individual stocks and bonds, mutual funds, exchange-traded funds and other freely traded securities. At present, however, we do not directly manage traded derivative securities such as options, swaps, futures or forwards.

2) Specific Consulting Assignments – Wilcox Investment Inc. also offers occasional consulting or investment research on specific assignments, with fee arrangements negotiated in advance. No such assignments were pursued in 2013.

Our portfolio supervision service is highly customized based on ongoing comprehensive reports of the client's total investment portfolio, tax situation, and communication of material financial obligations. Clients may impose restrictions on investing in certain securities or types of securities.

Wilcox Investment Inc. does not participate in wrap-fee programs.

As of February 28, 2014, Wilcox Investment Inc. managed \$137,444,000 of assets on a discretionary basis and \$12, 264,000 on a non-discretionary basis. Additionally, \$21,833,000 of assets are not directly managed but are subject to our advice, for which we charge a fee. We do not provide custody or accept authority to disburse client funds.

## **Item 5 – Fees and Compensation**

There is no fee schedule for comprehensive portfolio supervision, as we have only a limited number of clients and each has individualized requirements. Fees are based on assets under management and are set in advance by negotiation, not to exceed 1% of assets annually, payable monthly in arrears, allocated pro-rata on termination. Substantially lower fees are available for larger amounts to be managed. Fees for specific consulting or investment research assignments are negotiated in advance and payable in arrears.

Fees for comprehensive portfolio supervision, including advice, recommendations, and direct investment management services, are based on total assets supervised and billed separately after each month.

We do not provide custody, legal or accounting services. Fees for custodians, attorneys, accountants and brokers are paid to them directly by clients. Wilcox Investment Inc. neither pays nor is paid by them. See Item 12 in this Brochure for further information on our brokerage practices.

We do not accept fees paid in advance. Advisory contracts are cancellable on 30 day's notice by either party.

Neither Wilcox Investment Inc nor any officer or employee accepts compensation for the sale of securities or other investment products, including sales charges or service fees for

mutual funds. This policy reduces the potential for conflicts of interest. We are not affiliated with any broker or mutual fund company.

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

Wilcox Investment Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Fees for investment management accounts are based on assets under management.

#### **Item 7 – Types of Clients**

Wilcox Investment Inc currently provides portfolio management services to high net worth individuals and their associated family and trusts. Other types of clients may be considered on a case-by-case basis, depending on whether they might benefit from our particular experience. There is no account size minimum, but we do not actively seek accounts under \$20 million in investment assets.

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

Wilcox Investment Inc bases its investment advice and management on a comprehensive strategy including both quantitative and judgmental inputs. Our first assumptions are that securities markets are rather efficient and that high fees for investment management services are problematic. Consequently, we emphasize customized risk and tax management as the most reliable foundation for adding value to client investing. We also attempt to add additional return for a portion of investments that we directly manage, keeping in mind that forecasts of security returns are always unreliable.

Methods we use for stock analysis include both fundamental analysis of valuation versus operating results and qualitative judgments as to when investment themes are likely to come into greater favor. We invest globally. Detailed examination of public information is

typical for individual stock purchases. The primary inputs for investments in bonds are credit, maturity and diversification factors applied to groups of bonds or bond exchange-traded-funds rather than detailed examination of bond covenants. We pay considerable attention to effective diversification for both stocks and bonds. Inflation-sensitive securities such as exchange-traded funds that specialize in commodities may be added to the portfolio to reduce bond risks. Our diversification efforts also try to complement any concentrated client holdings such as in real estate or private capital. Except in the case of specific client restrictions, we pay more attention to the impact of the security at the portfolio level than to its characteristics considered in isolation. For example, we may include low-interest money-market funds within the portfolio to offset exceptionally volatile security prices. We also attempt to add after-tax value through avoiding short-term gain realizations, accelerating the recognition of any losses, and being reluctant to realize even long-term gains prematurely. Except in the unusual case of selling required for risk control, our focus is on longer-term holdings. Our goal is the long-term growth of the client's discretionary wealth in excess of their financial obligations.

It should be clearly understood that investing in securities involves risk of loss that clients should be prepared to bear. We do attempt to match the riskiness of the portfolio to the ability of the client to bear risk. In general, we discourage client investment in instruments or outside managers that involve hard-to-understand products and strategies. We do not attempt to avoid all losses in case of a potential stock or bond market decline. Client portfolios may hold individual securities that are highly volatile, and there is no assurance that client portfolios will not experience loss, even over a lengthy period.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Wilcox Investment

Inc. or the integrity of Wilcox Investment Inc.'s management. Wilcox Investment Inc. has no information applicable to this Item.

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

Wilcox Investment Inc. is not engaged in any businesses other than providing investment advice and management. It does not sell any other services or products. Jarrod Wilcox, President, its principal officer, however, is also President of Wealthmate, Inc., an independent company developing investment-related software. At some point in the future, Wealthmate, Inc. may seek to register with the SEC as an Internet investment advisor. A Director of Wilcox Investment Inc. is our attorney, but has no other relationship with the business.

Wilcox Investment Inc. is not affiliated with any other business.

In cases where we advise the selection of an outside investment manager, partnership, hedge fund, custodian, broker, bank, etc., we have no financial interest.

## **Item 11 – Code of Ethics**

Wilcox Investment Inc. has designed its business to be as simple and free as possible of potential conflicts of interest with those of clients, with one exception. Employees are permitted to buy and sell securities for their own account that may also be held or traded by clients, subject to Wilcox Investment Inc.'s Code of Ethics and Insider Trading Policy. The key provision of our Insider Trading Policy is that employee trades may not be done within a period of three days prior to a similar transaction by a client. If, in the future, Wilcox Investment Inc. should establish proprietary trading on the firm's account, the terms and conditions insuring fair treatment of clients will first be disclosed to them.



## WILCOX INVESTMENT INC. SUMMARY CODE OF ETHICS:

Employees of Wilcox Investment, Inc.:

- \_ Have a duty of loyalty and fiduciary responsibility to their clients.
- \_ Have a duty to protect client privacy.
- \_ Will uphold US and State laws and regulatory rules governing investment advisers.
- \_ Will not offer, solicit, or accept any consideration that reasonably could be expected to compromise independence and objectivity.
- \_ Will not knowingly make any misrepresentations relating to investment analysis, recommendations, actions, or other professional activities.
- \_ Will not engage in any professional conduct involving dishonesty, fraud, or deceit.
- \_ Must not act or cause others to act on material nonpublic information that could affect the value of an investment.
- \_ Will certify their familiarity and compliance with the Code of Ethics and Insider Trading Policy.

Wilcox Investment Inc.'s clients or prospective clients may request a more detailed copy of the firm's Code of Ethics and Insider Trading Policy by contacting Jarrod Wilcox, President.

It is Wilcox Investment Inc.'s policy not to cross trades between clients or between our firm and a client.

### **Item 12 – Brokerage Practices**

Wilcox Investment Inc. suggests brokers solely based on lower fees, excellent Internet online trading capability, and, for illiquid or foreign securities, exceptional execution ability. However, other brokers having higher fees are used at client request. Where we have discretionary authority, clients are not allowed to direct trades to a specific non-custodian broker. No soft dollar arrangements are accepted, and broker-provided research services are given no weight in either our investment decisions or recommendations of

suitable brokers. We do not solicit, and have not received, broker referrals of prospective clients.

Wilcox Investment Inc. does not aggregate the purchase or sale of securities across client accounts. We have no indication of any additional costs from not aggregating, and believe that in many cases unfavorable price impact of larger trades may offset any potential negotiated reduction in brokerage commissions.

### **Item 13 – Review of Accounts**

Directly managed discretionary accounts are ordinarily reviewed by their assigned Portfolio Manager not less than weekly. General portfolio supervision of non-discretionary accounts and oversight of other investment advisors within Wilcox Investment Inc.'s comprehensive portfolio supervision program is based on availability of reports. Review is conducted by the account's portfolio manager and chief investment officer. The portfolio manager for supervised or directly-managed portfolios is limited to no more than 5 principal clients, though each client may have several different accounts, for example, trusts for family members.

Clients are expected to place primary reliance on reports from custodians for holdings, transactions and performance. Estimates of holding values and performance from different sources may be brought together as a service based on client-provided reports or on reports from the client's custodian, broker or accountant. Consequent holding value estimates and performance calculations are regularly made available to the client. Holding value estimates based on the most recent information available may be included and used in fee calculation. A report summarizing aggregate holdings, estimated return and comparable index returns, with a very brief comment on apparent causes of market price activity, is emailed to clients monthly. Wilcox Investment Inc. does not provide custody, and does not have the power to debit fees from client accounts. Clients should compare

reports received from their custodians with those provided by Wilcox Investment Inc. See also Item 15 regarding custody arrangements.

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

In line with our policy to reduce potential conflicts of interest, no one who is not a client provides economic benefit, for example, sales awards or prizes, to Wilcox Investment Inc. for providing investment-related services to clients. Neither Wilcox Investment Inc. nor any related person compensates any non-employee for our client referrals.

#### **Item 15 – Custody**

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. Wilcox Investment Inc. urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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

Wilcox Investment, Inc. usually receives limited trading authority from the client, accepted by the custodian or broker, at the outset of any discretionary advisory relationship to select the identity and amount of securities to be bought or sold. The client may grant this discretion for some custodian, brokerage or mutual fund accounts and not for others, resulting in a mix of discretionary and non-discretionary responsibilities for the client. It is our policy not to accept authority for withdrawing funds from client accounts. Online client

passwords will not be accepted unless it is clear that this does not involve custody as per SEC definitions. In all cases, including selecting securities and determining amounts, discretionary trading authority is to be exercised acting as a fiduciary for the client, and furthermore in accord with any written instructions from the client as regards investment policies, limitations and restrictions.

#### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, Wilcox Investment Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. If asked, Wilcox Investment Inc. may provide advice to clients regarding the clients' voting of proxies.

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

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures of financial condition. However, Wilcox Investment Inc. does not require, solicit or accept prepayment of fees, and does not accept any responsibility for custody, including the ability to withdraw fees or other funds from client accounts, and is therefore not required to provide a balance sheet. Wilcox Investment Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

**Item 1- Cover Page**

**Jarrold W. Wilcox**  
**Wilcox Investment Inc.**

950 Centre Street

Newton, MA 02459

617-332-4666

March 22, 2013

**This Brochure Supplement provides information about Jarrod W. Wilcox that supplements the Wilcox Investment Inc. Brochure. You should have received a copy of that Brochure. Please contact Jarrod W. Wilcox at 617-332-4666 if you did not receive Wilcox Investment Inc.'s Brochure or if you have any questions about the contents of this supplement.**

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

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

**Name:** Jarrod W. Wilcox, PhD, CFA\*

**Birthdate:** August 16, 1943

### **Experience:**

December, 2001 To Present: President, Wilcox Investment Inc.

November, 1994 To October, 2001: Director of International Equities, Director of Research, Director of Overseas Products & Currency, Director of Advanced Products, PanAgora Asset Management.

January, 1991 to October, 1994: Portfolio Manager, Director of International Investments, Batterymarch Financial Management.

September, 1985 to January, 1991: Head of Equity Group, Chief Investment Officer, Colonial Management Associates.

### **Education:**

1968-1970 Massachusetts Institute of Technology, awarded Ph.D. in Management.

1966-1967 Massachusetts Institute of Technology, awarded S.M. in Management.

1961-1965 Massachusetts Institute of Technology, awarded S.B. in Industrial Management

\*The Chartered Financial Analyst (CFA) designation is a professional certification offered by the CFA Institute. In addition to other requirements for the CFA designation that Jarrod W. Wilcox's experience and education satisfy, recipients must pass each of three six-hour exams and are obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

**Item 4- Other Business Activities**

Jarrold W. Wilcox is engaged in no other investment-related business or occupation than Wilcox Investment Inc. and serving as President of Wealthmate Inc., an independent business engaged in developing investment-related software. There is no business relationship between Wilcox Investment Inc. and Wealthmate Inc. and no potential conflict of interest with respect to clients from this relationship appears to exist, and there is no overlap or with the exception that one client of Wilcox Investment Inc owns a minority financial interest (less than 5%) in Wealthmate, Inc. Jarrod W. Wilcox receives no financial compensation from any other source that might relate to the clients of Wilcox Investment Inc.

**Item 5- Additional Compensation**

Jarrold W. Wilcox receives no economic benefit, including sales awards, prizes, or bonuses, from someone or business not a client of Wilcox Investment Inc. in return for providing advisory services to clients of Wilcox Investment Inc.

**Item 6 – Supervision**

Jarrold W. Wilcox is President of Wilcox Investment Inc., and is supervised only by its board of directors and outside regulatory authorities.