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**FORM ADV PART 2A. BROCHURE**

**This brochure provides information about the qualifications and business practices of Davis & Wehrle, LLC. If you have any questions about the contents of this brochure, please contact us at 512-346-1131. 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 Davis & Wehrle, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Davis & Wehrle, LLC is 144572.**

**Davis & Wehrle, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

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## ***Advisory Business***

Form ADV Part 2A, Item 4

Firm shall provide investment supervisory services to certain clients. In addition, Firm will also offer fee based financial planning services to certain clients and will offer selection of outside advisers to certain clients as well.

Approximately seventy (70%) percent of Firm's total advisory billings shall be attributable to the provision of investment supervisory services and selection of outside managers and approximately twenty-five (25%) percent shall be attributable to fee based financial planning involving securities. Approximately five (5%) percent of Firm's effort shall involve fee based planning not involving advice about securities.

As of December 31, 2014, the Firm manages \$39,043,017 on a discretionary basis and \$84,882,448 on a non-discretionary basis.

## ***Fees and Compensation***

Form ADV Part 2A, Item 5

No fee shall be based upon capital gains or upon capital appreciation of assets. Fees are payable quarterly in arrears. Fees are generally negotiable. Clients are advised that in addition to paying our firm's fees, the client shall also bear a proportionate amount of the operating expenses of the various funds in which they are invested, including management fees that are paid to the funds' advisers. This is known as "layering of fees".

With respect to investment supervisory services, the Firm's fee shall be as follows:

<b>Assets Under Management</b>		<b>Annual Fee</b>	
<b>From</b>	<b>To</b>		
\$ 0	-	\$ 50,000	2.25%
\$ 50,001	-	\$ 100,000	2.00%
\$ 100,001	-	\$ 250,000	1.75%
\$ 250,001	-	\$ 500,000	1.50%
\$ 500,001	-	\$ 1,000,000	1.25%
\$ 1,000,001	-	\$ 5,000,000	1.15%
\$ 5,000,001	-	Over	1.00%

The minimum Annual Account Fee shall be \$1,250.00.

Termination must be provided in writing by the client.

With respect to financial planning fees, the Firm shall charge an hourly fee ranging from \$150.00 per hour to \$225.00 per hour or a flat fee ranging between \$1,750.00 to \$15,000.00 depending on the facts and circumstances of the case and depending upon the anticipated complexity of the case. Additional expenses realized outside the scope of any financial planning contract may be billed at cost.

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

Form ADV Part 2A, Item 6

None.

***Types of Clients***

Form ADV Part 2A, Item 7

Individuals, pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

The minimum Annual Account Fee shall be \$1,250.00.

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

Form ADV Part 2A, Item 8

Methods of securities analysis shall be fundamental analysis and technical analysis.

Investment strategies shall be long term purchases (securities held more than a year), short term purchases (securities sold within a year) and trading (securities sold within 30 days).

Investing in securities involves a risk of loss that clients should be prepared to bear.

***Disciplinary Information***

Form ADV Part 2A, Item 9

None.

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

Form ADV Part 2A, Item 10

Firm may select outside third party managers on behalf of certain advisory clients.

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

Form ADV Part 2A, Item 11

The firm has adopted a written Code of Ethics in compliance with SEC Rule 204A-1. The code sets forth standards of conduct and requires compliance with federal securities laws. Our code also addresses personal trading and requires our personnel to report their personal securities holdings and transactions to the Chief Compliance Officer of the firm. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

In the unlikely event that the interests of the Firm's account would happen to correspond with an advisory client's interests, full disclosure would be made to such client at once.

It is further noted that Firm is in and shall continue to be in total compliance with The Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Firm has adopted a firm wide policy statement outlining insider trading compliance by Firm and its associated persons and other employees. This statement has been distributed to all associated persons and other employees of Firm and has been signed and dated by each such person. A copy of such firm wide policy is left with such person and the original is maintained in a master file. Further, Firm has adopted a written supervisory procedures statement highlighting the steps which shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and other employees of Firm, are signed, dated and filed with the insider trading compliance materials. There are provisions adopted for (1) restricting access to files, (2) providing continuing education, (3) restricting and/or monitoring trading on those securities of which Firm's employees may have non public information, (4) requiring all of Firm's employees to conduct their trading through a specified broker or reporting all transactions promptly to Firm, and (5) monitoring the securities trading of the firm and its employees and associated persons.

It is the expressed policy of Firm that no person employed by Firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory client, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

Firm or any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations may represent a conflict of interest, Firm has established the following restrictions in order to ensure its fiduciary responsibilities:

- 1) A director, officer or employee of Firm shall not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No person of Firm shall prefer his or her own interest to that of the advisory client.
- 2) Firm maintains a list of all securities holdings for itself, and anyone associated with this advisory practice. Kevin Tucker Davis reviews these holdings on a regular basis.
- 3) Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- 4) Any individual not in observance of the above may be subject to termination.

### ***Brokerage Practices***

Form ADV Part 2A, Item 12

Firm may recommend specific brokers to certain advisory clients. Brokers will be selected according to commission structure, track record, service and reputation in the industry.

Firm may receive certain “soft dollar benefits” from non-clients in conjunction with providing investment advice to clients.

### ***Review of Accounts***

With respect to investment supervisory activities, the qualified custodial firm will send quarterly statements directly to the advisory client. With respect to fee based financial planning activities, an annual review will be encouraged.

### ***Client Referrals and Other Compensation***

Form ADV Part 2A, Item 14

The firm may pay solicitation fees. Full compliance with SEC Regulation 375.206-4-3 shall be maintained at all times. There are no arrangements in relation to any other compensation.

### ***Custody***

Form ADV Part 2A, Item 15

None.

### ***Investment Discretion***

Form ADV Part 2A, Item 16

Firm may exercise discretionary authority on behalf of certain asset management clients. A “limited Power of Attorney” is executed by the advisory client who provides limited discretionary trading authority to the firm. As a result of this arrangement, the firm may determine, without first obtaining client consent, the securities to be bought or sold and the amount of the securities to be bought or sold.

***Voting Client Securities***

Form ADV Part 2A, Item 17

The firm does not vote proxy statements on behalf of advisory clients.

***Financial Information***

Form ADV Part 2A, Item 18

Financial reporting is not required as the firm does not receive fees more than six months in advance.