



## **PART 2 OF FORM ADV – BROCHURE**

### **Wolverine Wealth Advisory Services, Inc.**

**Before 04/18/2011: 21 E. Long Lake Rd., Ste. 200  
Bloomfield Hills, MI 48304**

**On/after 04/18/2011: 40900 Woodward Ave., Ste. 265  
Bloomfield Hills, MI 48304**

**(248) 220-2202**

**March 25, 2011**

This Brochure provides you information about the qualifications and business practices of Wolverine Wealth Advisory Services, Inc. (referred to in this Brochure as “us,” “we,” “our” or the “firm”). If you have any questions about the contents of this Brochure, please contact us at (248) 220-2202. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

We are a registered investment adviser. Registration of an adviser does not imply any level of skill or training.

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

## **SUMMARY OF MATERIAL CHANGES**

This Section is a new requirement under the “Amendments to Form ADV” which was published by the SEC on July 28, 2010. This Brochure dated March 25, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Brochure is materially different in structure and requires certain new information that we were not required to include in our previous brochure. We recommend that you read our entire Brochure.

In the future, this Section will discuss only specific material changes (including a summary of those changes) that we made to our Brochure since the last annual update of our Brochure. At that time, we will also reference the date of our last annual update of our Brochure.

Currently, our Brochure may be requested by contacting Anne Breuch, President at (248) 220-2202 or [abreuch@wolverinewealth.com](mailto:abreuch@wolverinewealth.com).

Additional information about us 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 us who are registered, or are required to be registered, as one of our investment adviser representatives of our firm.

## **TABLE OF CONTENTS**

COVER PAGE.....	i
SUMMARY OF MATERIAL CHANGES .....	ii
TABLE OF CONTENTS.....	iii
ADVISORY BUSINESS .....	1
FEES AND COMPENSATION .....	2
PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT.....	4
TYPES OF CLIENTS.....	5
METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS .....	5
DISCIPLINARY INFORMATION.....	6
OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	7
CODE OF ETHICS.....	7
BROKERAGE PRACTICES.....	7
REVIEW OF ACCOUNTS .....	9
CLIENT REFERRALS AND OTHER COMPENSATION .....	9
CUSTODY .....	10
INVESTMENT DISCRETION .....	10
VOTING CLIENT SECURITIES .....	10
FINANCIAL INFORMATION .....	11

## **ADVISORY BUSINESS**

### **Our Owners and Principals**

We are a Michigan corporation established in 2008. We are required to disclose anyone that owns twenty-five percent (25%) or more of our firm's membership interests. Anne T. Breuch is our president and owns all of our firm's common stock.

### **Our Advisory Services**

We offer discretionary and non-discretionary wealth management services and financial planning services. Prior to engaging us to provide our services you will be required to enter into a written agreement with us setting forth the terms and conditions under which we will provide our services. Our specific services, terms of our compensation, method of payment, and other important information are explained in more detail below.

#### ***Wealth Management Services***

We provide wealth management services based on your individual needs. Through our personal discussions with you, we analyze your investment goals and objectives and develop your investment policy. We invest your assets based on your investment policy.

#### ***Investment Supervisory Services - Qualified Plans***

We provide investment management services to qualified retirement plans which are subject to the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). As part of our services to qualified plans, we will act as an ERISA 3(38) fiduciary advisor. As a 3(38) advisor, you give us discretionary authority to manage your plan's assets. This means that you shift your fiduciary responsibility to us for the selection of your investments.

For all qualified plan clients, we start by assisting you with the creation and maintenance of your investment policy statement. Your investment policy statement may place restrictions on the types of investments the plan assets may invest in. We may select an investment strategy and choose from one or more mutual fund asset allocation models offered by SEI Investments Management Corporation, or we may recommend the purchase of individual funds. We may allocate all or a portion of your monies among the SEI Funds, a family of mutual funds advised by SEI Investment Management Corporation or Dimensional Funds, in accordance with your investment strategy or model selected by you with our assistance. We may adjust the asset allocation to ensure that the investment mix reflects the objectives of the chosen strategy. We continually monitor the performance of all investment options. We prepare a quarterly performance and holdings report for you.

The asset allocation models, allow plan participants to invest according to their specific goals, objectives, time to retirement, as well as risk tolerance.

## ***Financial Planning Services***

Upon request, we offer limited personal financial planning advice if you are one of our wealth advisory clients. Such advice may encompass recommendations regarding any or all of the following areas of concern:

- Personal: Family records, budgeting, personal liability, estate information and financial goals;
- Education: Education IRAs, financial aid, state savings plans, grants and general assistance in preparing to meet dependent's continuing educational needs through development of an education plan;
- Tax and Cash Flow: Income tax and spending analysis and planning for past, current and future years. We will illustrate the impact of various investments on a client's current and future income tax liability;
- Death and Disability: Cash needs at death, income needs of surviving dependents, estate planning financial analysis and disability income analysis;
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals;
- Investments: Analysis of investment alternatives and their effect on a client's portfolio;
- Estate: Analysis of financial issues with respect to living trusts, wills, estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law; and
- Insurance: Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobile.

## **Assets Under Management**

We manage your assets on either a discretionary or a nondiscretionary basis. As of December 31, 2010, we had \$51,224,000 in client assets managed on a discretionary basis and \$3,000,000 in client assets managed on a nondiscretionary basis.

## **FEES AND COMPENSATION**

### **Fees for Wealth Management Services**

We charge either flat fees or fees based upon assets under management. We establish our fee arrangements with you in our written agreement with you.

Flat fees are available only for high net worth clients, those with at least \$8,000,000 in assets under management. If we charge you on a flat fee basis, the minimum annual fee is \$41,500 per year billed quarterly in advance. Under certain circumstances, we may negotiate the minimum annual flat fee and the minimum account size for our flat fee arrangements.

If we do not charge you a flat fee, our fee is an annual fee based upon a percentage of the market value of the assets held in your account. The annual fee is charged quarterly, in arrears, based upon the market value of the assets on the last day of the previous quarter. If you begin our services on a day other than the first date of a calendar quarter, we prorate your fees for the first quarter.

### **Wealth Management Services**

(Excluding fixed income bond portfolios)

<u>Assets</u>	<u>Annual Fee (%)</u>
up to \$500,000	1.00%
\$500,001 to \$750,000	0.90%
\$750,001 to \$1,000,000	0.80%
\$1,000,001 to \$1,500,000	0.70%
\$1,500,001 to \$2,000,000	0.65%
\$2,000,001 to \$3,000,000	0.60%
\$3,000,001 to \$4,000,000	0.57%
\$4,000,001 to \$5,000,000	0.53%
over \$5,000,000	0.50%

### **Fixed Income Bond Portfolio**

<u>Assets</u>	<u>Annual Fee (%)</u>
up to \$500,000	0.35%
\$500,001 to \$750,000	0.30%
\$750,001 to \$1,000,000	0.27%
\$1,000,001 to \$1,500,000	0.25%
\$1,500,001 to \$2,000,000	0.23%
\$2,000,001 to \$3,000,000	0.20%
\$3,000,001 to \$4,000,000	0.19%
\$4,000,001 to \$5,000,000	0.18%
over \$5,000,000	0.17%

We may group related client accounts for purposes of determining the amount under management and the annualized management fee. In certain circumstances, fees may be negotiated. In these circumstances, our negotiated fee schedule will be set forth in your investment management agreement.

We will provide financial planning services as part of our wealth management service at no additional cost to you.

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses incurred in connection with providing wealth management services to you. Mutual funds also charge internal management fees, which are disclosed in the fund's prospectus. Such charges, fees and commissions are in addition to our fee.

As described in more detail in the section “**BROKERAGE PRACTICES**” beginning on page 7, in certain circumstances we may rebate trading costs if the client's account was transferred from a lower cost brokerage firm to Charles Schwab & Co., Inc. In these circumstances, we reduce our advisory fees in order to cover a portion of the trade costs charged by Schwab. In determining whether to provide a rebate, we consider the size and complexity of your account and whether custody of your account was moved from a lower cost brokerage firm to Schwab. If we agree to reduce your trading costs, we will calculate the reduction of trade costs at the time we invoice your account and the amount of the reduction or rebate is applied to your invoice. If we have agreed to reduce your trading costs, we will put our agreement in writing.

You may terminate your investment management agreement with us within five business days of signing the agreement without any cost or penalty. After that, either of us may terminate our agreement at any time by providing the other with five day's written notice. We prorate our fees through the date of termination and we charge or refund you any outstanding balance, as appropriate, in a timely manner.

#### **Fees for Investment Supervisory Services – Qualified Plans**

If we provide investment supervisory services to your qualified plan, we will charge our wealth management fee as described above. For plans invested in SEI Funds, you will pay SEI Investments Management Corporation or its affiliates, additional fees for administration, distribution and in some cases advice, as disclosed in the SEI Funds' prospectus, which you should read before investing.

#### **Direct Billing to Your Custodian**

You may elect to be billed directly for our fees, have our fees charged to your credit card or you may authorize us to debit our fees from your accounts. Generally, our clients authorize us under our agreement to directly deduct our fees from their account. If you provide us such authorization, the custodian's periodic statements will show each fee deduction from your account. You may withdraw this authorization for direct billing of these fees at any time by notifying us or your custodian in writing. If we bill you directly, our fees are due within 30 days of the date of each invoice.

#### **PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of your assets).

## **TYPES OF CLIENTS**

We provide wealth management services to individuals, high net worth individuals, pension and profit-sharing plans, trusts and estates and charitable institutions.

We impose certain conditions for starting or maintaining an account. A minimum of \$500,000 of cash and/or securities is generally required to open an account using our wealth management services. We may aggregate related accounts for the purposes of meeting this minimum account size and for determining the annual fee to be charged. Account size minimums may be negotiable under certain circumstances, and client accounts where the total balance of all accounts is less than \$500,000 will be accepted only on a case-by-case basis.

The minimum account size for qualified plans to participate in the SEI Asset Allocation Program is \$250,000; this may be negotiable in certain circumstances.

## **METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **Methods of Analysis**

We recommend mutual funds. In analyzing these potential investments, we review information from a number of sources, both public and by purchase, including financial newspapers and magazines, research materials prepared by third-parties, corporate rating services, annual reports, prospectuses and filings with the SEC and company press releases. We believe these resources for information are reliable and regularly depend on these resources for making our investment decisions; however, we are not responsible for the accuracy or completeness of this information.

### **Investment Strategies**

We use a variety of investment strategies depending on your circumstances, financial objectives and needs. We may recommend implementing one or more of the following investment strategies: long-term purchases (held at least a year), short term purchases (held less than a year) or a combination of both investment strategies to help you meet your investment objectives. We will recommend implementing these strategies using mutual funds. Mutual funds will be selected based on any or all of the following criteria: performance history; industry sector; manager's track record; investment objectives; management style and philosophy; asset class; risk level; income and/or yield potential; and management fee structure. We focus primarily on funds that are "no load" (i.e., where the investor does not pay any sales fee or commission) and which do not pay excessive 12b-1 fees or any deferred sales fees (so-called "back-end loads"). We often recommend mutual funds of different kinds to promote portfolio diversification within various asset classes, such as industry sectors, domestic/international, or equities/bonds. We may recommend periodic purchases, sales, and exchanges of those mutual fund shares within mutual fund families and between different mutual fund families when there are changes in your needs, market conditions, or economic developments.



## **Types of Investments and Risk of Loss**

We offer advice about different investments, including mutual funds, each having different types and levels of risk. We will discuss these risks with you in determining your investment objectives that will guide our investment advice. We will explain and answer any questions you have about these kinds of investments, which present special considerations such as the following.

Investing in securities involves risk of loss that you should be prepared to bear. Obtaining higher rates of return on investments typically entails accepting higher levels of risk. We work with you to attempt to identify the balance of risks and rewards that is appropriate and comfortable for you. However, it is still your responsibility to ask questions if you do not fully understand the risks associated with any investment or investment strategy.

Also, while we strive to render our best judgment on your behalf, many economic and market variables beyond our control can affect the performance of your investments and we cannot assure you that your investments will be profitable or assure you that no losses will occur in your investment portfolio. Past performance is one relatively important consideration with respect to any investment or investment advisor, but it is not a predictor of future performance.

Mutual funds typically charge their shareholders various advisory fees and expenses associated with the establishment and operation of the funds. These fees will generally include a management fee, shareholder servicing, other fund expenses, and sometimes a distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge. These separate fees and expenses are disclosed in each fund's current prospectus, which is available from the fund or we can provide it to you upon request.

Consequently, for any type of fund investment, it is important for you to understand that you are directly and indirectly paying two levels of advisory fees and expenses: one layer of fees at the fund level and one layer of advisory fees and expenses to us. Generally speaking, most mutual funds may be purchased directly, without using our services and without incurring our advisory fees.

We primarily recommend mutual funds from SEI and the Dimensional Funds. These mutual fund families are institutional type funds, not readily available to the general public, and have much lower fees than retail mutual funds. These funds are no load and offer the ability to diversify your portfolio among many asset classes, both domestically and internationally.

## **DISCIPLINARY INFORMATION**

As a registered investment adviser, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our firm or the integrity of our management. We have no legal or disciplinary events to disclose.

## **OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

As a registered investment adviser, we must disclose information regarding our business activities, other than giving investment advice, our other activities in the financial industry, and any arrangements with related persons that are material to you or our advisory business. We are also required to disclose if we receive cash or other economic benefits from a third-party in connection with advising you. We have no information applicable to disclose.

## **CODE OF ETHICS**

We have adopted a Code of Ethics (the “Code”) describing the standards of business conduct we expect all officers, employees, and advisory representatives to follow. The Code also describes certain reporting requirements with which particular individuals associated with or employed by us must comply. We will provide a copy of the Code at no charge to you upon request.

Our principals and representatives will often own the same securities we recommend to you or our other clients. Generally, these securities will be shares of open ended mutual funds where the time and size of their purchases or sales will not affect transactions for you or our other clients.

You may request a copy of our Code by contacting our President, Anne Breuch at (248) 220-2202 or [abreuch@wolverinewealth.com](mailto:abreuch@wolverinewealth.com).

## **BROKERAGE PRACTICES**

### **Directed Brokerage & Soft Dollars**

Although we do not require you to use a specified broker-dealer, we have established a brokerage relationship with Charles Schwab & Co., Inc., a registered broker-dealer for custodian and brokerage services. We are independently owned and operated and are not affiliated with Schwab. Schwab offers independent investment advisory firms like us support products and services through their program Schwab Adviser Services™. To receive the benefit of these services we are required to maintain a total of at least \$10 million of our client’s assets in accounts at Schwab.

Schwab’s support products and services include:

- access to Schwab’s institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers
- services to manage or administer your account such as access to your account data, provide pricing and other market data, facilitate payment of our fees from your account and assist with recordkeeping requirements

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don’t have to pay for Schwab’s services so long as we maintain a

total of at least \$10 million of our client's assets at Schwab. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab is in your best interest. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us.

In addition, we have a relationship with SEI Adviser Network where we offer their unaffiliated third party programs to qualified plans. For clients invested in SEI mutual funds, SEI acts as a custodian for the client's assets and enables us to buy and sell SEI mutual funds. SEI does not require us to custody a minimum amount of client assets to use their funds. You are under no obligation to participate in these programs. We do not receive any economic benefit from SEI for referring our clients to their programs. We are independently owned and operated and are not affiliated with SEI.

As described in more detail in the section "**FEES AND COMPENSATION**" beginning on page 2, we may reduce our advisory fees in order to cover a portion of the trading costs charged by Schwab. In determining whether to reduce our fee, we consider the size and complexity of your account and whether custody of your account was moved from a lower-cost brokerage firm to Schwab.

We have not and do not intend to enter into any contractual third-party soft-dollar arrangements, such as where we commit to place a specific level of brokerage with a specific firm in return for which the brokerage firm will pay for various research related products or services for us that are generally available for cash purchase.

You may direct us to utilize a specified broker-dealer, of your choosing, to effect transactions for or with your account, or our agreement with you may state a directed brokerage arrangement with a specified financial services firm. Subject to our duty of best execution, we may decline your request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If you choose to direct your brokerage, you should understand that, in the case of such a directed brokerage arrangement:

- you will be solely responsible for negotiating the terms and arrangements on which those brokers and dealers are engaged, and we will have no responsibility for reviewing the fairness of those terms and arrangements;
- we will not seek better execution services or prices from other brokers and dealers in connection with transactions for your account;
- we will not be able to "batch" or "aggregate" transactions for your account with transactions for our other clients not subject to a similar such arrangement;

- we will not monitor the performance of or the services provided by the brokers and dealers so designated; and
- you may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

However, we may seek better execution services or prices from other brokers or dealers or “batch” your transactions for execution if such action is required by law or fiduciary duties, including but not limited to, the fiduciary duty provisions under ERISA, if you are a plan subject to ERISA, or if the designated broker or dealer is unable or unwilling to effect a particular transaction or transaction, which may occur with certain transactions involving fixed-income securities.

Due to our low trade volume, client specific trades and the use of mutual funds, we do not aggregate orders for client accounts. The purpose of aggregating orders is for our administrative convenience and, in some transactions, to obtain better execution for the aggregated order. Since mutual funds trade at the end of the day, all clients receive the same price, no matter what time the trade is placed that day.

### **REVIEW OF ACCOUNTS**

The frequency and triggering factors for internal account reviews depend upon the services we provide to you. Anne Breuch conducts all client account reviews.

If we provide you with wealth management services, we will continuously monitor the underlying securities in your account. We will review your account on a regular basis, not less often than quarterly. These reviews may be triggered by changes in your personal or financial information, market conditions or economic news or events. Reviews may involve the entire account or just specific securities held in the account.

If we provide you with wealth management services, we will send portfolio position statements to you quarterly. These statements include your account balances, holdings and summary of your account performance.

For qualified plans where we actively monitor your other investment advisers, in addition to the reviews provided by us as described above, your other investment advisers will review your account and provide account statements as described in their disclosure brochures.

If we provide you with financial planning services, we will prepare a written financial plan. Typically, we do not provide additional reports unless agreed upon in writing.

### **CLIENT REFERRALS AND OTHER COMPENSATION**

We are required to disclose if we receive an economic benefit from a third party, who is not a client, for providing investment advice or other advisory services to our clients. We are

also required to disclose whether we compensate anyone who is not a supervised person of our firm for client referrals. We do not receive any such benefits or have any referral or solicitation arrangements.

### **CUSTODY**

You will receive statements from the broker-dealer, bank or other qualified custodian that holds and maintains your investment assets at least quarterly. We urge you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you, as described in the “**REVIEW OF ACCOUNTS**” beginning on page 9. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

In addition, as described in more detail in the “**BROKERAGE PRACTICES**” section starting on page 7, we receive various benefits and services from Charles Schwab & Co., Inc.

### **INVESTMENT DISCRETION**

We generally receive discretionary authority in writing from clients at the outset of an advisory relationship in the investment management agreement. If you choose to do so, discretionary authority grants us the ability to determine, without obtaining your specific consent, the securities to be bought or sold for your portfolio, the amount of securities to be bought or sold, and in most cases, the broker or dealer to be used and the commission rate to be paid. As described in more detail in “**ADVISORY BUSINESS**” beginning on page 1, such discretion is to be exercised in a manner consistent with your stated investment objectives for the account and by considering the size of your account and your risk tolerance. When selecting securities and determining amounts, we observe any investment policies, limitations and restrictions you provide to us in writing. You may place limitations on our discretion in our agreement that we establish with you, and such limitations may be changed by you at any time.

Also, you may sign an agreement with your custodian which generally includes a limited power of attorney granting us authority to direct and implement the investment and reinvestment of your assets within the account, but not direct the assets outside of the account.

### **VOTING CLIENT SECURITIES**

As a matter of firm policy and practice, we will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in your account. Proxy solicitation materials will be forwarded to you for response and voting. If you are an ERISA plan, the plan fiduciary of your account expressly retains the authority and responsibility for voting any proxies and we are expressly precluded from voting your proxies.

## **FINANCIAL INFORMATION**

As a registered investment adviser, we are required to provide you with certain financial information or disclosures about our financial condition if we have financial commitments that impair our ability to meet contractual and fiduciary commitments to you. We have not been the subject of a bankruptcy proceeding and do not have any financial commitments that would impair our ability to meet any contractual or fiduciary commitments to you.

131902.143199 5258283