

# **WEICK & ASSOCIATES, INC.**

## **CLIENT BROCHURE**

*This brochure provides information about the qualifications and business practices of Weick & Associates, Inc. If you have any questions about the contents of this brochure, please contact us (586) 524-6171 at or via email directly to the Chief Compliance Officer at [eweick@comcast.net](mailto:eweick@comcast.net). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC").*

*Additional information about Weick & Associates, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Weick & Associates' CRD number is: 106230*

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*Registration does not imply a certain level of skill or training.*

Version Date 3/30/2011

## **ITEM 2: MATERIAL CHANGES**

This ADV Form 2A represents the March 2011 disclosure document prepared by Weick & Associates, Inc. in conjunction with its initial transition to the newly required Form ADV Part 2a and Part 2b.  
There are no material changes to report at this time.

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## ITEM 4: ADVISORY BUSINESS

### A. DESCRIPTION OF THE ADVISORY FIRM.

Weick & Associates, Inc. (“*Weick & Associates*.”) has been in business since 1988 when it was initially registered with the Securities & Exchange Commission. Edward Weick is Weick & Associates’ President and Chief Compliance Officer and is a 50% owner of the firm. Tracy Weick is the firm’s Executive Vice-President and is a 50% owner.

### B. TYPES OF ADVISORY SERVICES

Weick & Associates, Inc., (Weick & Associates, or “*Adviser*”) offers professional fee-only investment advisory services. Weick & Associates is a Registered Investment Adviser and is not a broker/dealer or custodial firm.

“*Advisory Representatives*” are those persons authorized to deliver financial and investment advisory services on behalf of the Adviser. Advisory Representatives of Weick & Associates are not registered representatives of a broker/dealer and the Representatives are not independent insurance agents. Therefore, neither the Adviser nor the Representatives of Weick & Associates accept commissions for securities or insurance recommendations. The term “*fee-only*” means we are only compensated via advisory fees paid by clients.

The Adviser may offer a complimentary general consultation to discuss financial and investment advisory services available; to give a prospective client an opportunity to review services desired; and to determine the possibility of a potential Client-Adviser relationship. Services begin only after the client and Adviser formalize the relationship with a properly executed Client Agreement.

After the formal engagement and depending upon the scope of the engagement, the Adviser and client will share in a data gathering and discovery process in an effort to determine the client’s needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. The client and Adviser may complete a risk assessment, investment policy statement or similar document, depending upon the nature of services to be provided.

Weick & Associates offers **Investment Supervisory Services**.

1. Investment Supervisory Services are ongoing in nature, focus solely on portfolio management, and do not include financial planning services or consultation services outside the scope of the managed investments.

#### ITEM 4: ADVISORY BUSINESS

(Continued)

**Investment Supervisory Services** begin only after the client and Adviser formalize the relationship with a properly executed Client Agreement. An initial interview and data-gathering questionnaire (Investment Policy Statement) is undertaken to determine the Client's individual needs, goals and objectives, time horizons, tax situation and risk tolerance. The Client will receive recommendations for investments which may include planning for long-range goals or other segments of an investment plan that may be needed. The Adviser will implement the investment recommendations and provide portfolio services on a discretionary basis. The Adviser can tailor services as desired by the Client, however where Investment Supervisory Services or information are limited, clients must understand that comprehensive investment needs and or objectives may not be fully considered due to the client's option not to receive limited services, the lack of information received, and/or client disclosure.

The initial data-gathering interview allows the Adviser to help determine the client's stated individual needs, goals, time horizons and risk tolerance. Weick & Associates utilizes the information provided by the client to prepare recommendations for investments, which may include planning for long-range goals (*i.e.*, retirement planning or college funding) or other segments of an investment plan that may be desired. Investments may include short-term instruments, money market funds, stocks, bonds, or other investment vehicles.

Weick & Associates may offer suggestions on mutual funds that are part of an overall asset plan but does not charge a fee for these suggestions. Weick & Associates does not make mutual fund investments on behalf of Clients nor does the Adviser manage this component of a Client's portfolio. The Adviser does not offer advice on private company investments. After an analysis and data-gathering process and depending upon the nature of services desired, the Adviser may prepare reviews, analysis, asset allocation recommendations, and may recommend specific investments.

Clients engaging investment advisory services must play an active role. The Adviser requires the client to participate in the formation of the investment plan, the development of investment advice and recommendations and the ongoing services provided. Clients may call the office during regular business hours to discuss their portfolio or ask questions, but the Adviser recommends that clients initiate a meeting with the Adviser no less than annually. *However, clients are obligated to immediately inform the Adviser of any changes in their financial situation to provide the Adviser with the opportunity to review the portfolio to ensure it is still structured to help meet the client's stated needs and objectives.*

The ongoing Investment Supervisory Services provided are based upon the client's stated individual needs and objectives. Weick & Associates will generally seek to allocate the client's assets among various investments, taking into consideration the overall management style and portfolio framework selected by the client. The Adviser attempts to construct a diversified portfolio of investment recommendations that are within its realm of expertise. In each case, the stated individual needs, goals and desires of clients are taken into consideration.

## **ITEM 4: ADVISORY BUSINESS**

*(Continued)*

In providing ongoing Investment Supervisory Services, Weick & Associates will manage investor funds in accordance with an investment policy/strategy or plan as selected by the client and the Adviser will remain available for ongoing advice and recommendations. The Adviser will provide ongoing monitoring of the portfolio in accordance with the directives provided. The underlying portfolio assets will be reviewed internally on a frequent basis (generally quarterly or more often), depending upon the types of investments, market conditions, at the discretion of the Adviser, or as may be specifically requested by the client. Any investments placed with Independent Managers for services will generally be reviewed quarterly if part of the Adviser's managed portfolio.

### **C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS**

Weick & Associates focuses on providing individualized services. The Adviser can tailor services to focus only on certain portfolio components, depending upon the client's wishes and/or the nature of the engagement. However, where client services or information are limited, clients must understand that comprehensive investment needs and objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure. The Adviser and client will share in a data gathering and discovery process in an effort to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. The client and Adviser may complete a risk assessment, investment policy statement or similar document, depending upon the nature of services to be provided. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs unless the terms are agreed in writing between the client and the Adviser. Clients are welcome to set parameters on the Adviser's limited discretionary authority in writing as to types of investments and amounts purchased or sold.

Where clients retain authority to implement recommendations, they are welcome to do so in whole or in part via the financial services provider(s) of their choice.

### **D. WRAP FEE PROGRAMS**

Weick & Associates does not participate in wrap fee program recommending wrap fee programs nor is the Adviser a wrap fee program manager or sponsor.

### **E. AMOUNTS OF ASSETS UNDER MANAGEMENT**

Weick & Associates' fiscal year end discretionary assets under management as reported in the Adviser's 2010 fiscal year end filing are: \$44,844,132.



## ITEM 5: FEES AND COMPENSATION

### A. FEE SCHEDULES

Weick & Associates is only compensated for advisory services in the following manner:  
A percentage of assets under management.

1. Advisory fees for **Investment Supervisory Services** are computed at a percentage of the assets up to 2% (annual rate) of the market value of the investment portfolio, set forth by the Client's custodian and invoiced quarterly. In the rare case where there is an absence of a portfolio value (via the custodial firm), the Adviser will utilize at least one independent third party to assess the value of the particular holding. Advisory fees are based upon the nature or complexity of services, time and effort, and the nature of the portfolio. Advisory fees are agreed upon at the time of engagement and may be modified by mutual agreement.

### B. PAYMENT OF FEES

1. Investment Supervisory fees are payable monthly and in advance of services. Where services are initiated at any time other than the beginning of a calendar quarter, advisory fees will be pro-rated. The payment of fees is facilitated by a debit directly to the client's account by the qualified custodian holding the client's fund or securities. A qualified custodian as defined by the SEC is a firm that sends account statements directly to clients no less than quarterly and the statements will provide information about account activity and each advisory fee deduction.

Since custodians do not verify the accuracy of the advisory fee calculation, Clients should review each custodial statement and promptly contact the Adviser if any questions should arise. Clients must ensure they continue to receive account statements directly from their custodial firm(s). Clients should promptly report address changes to both the Adviser and their custodial firm(s).

The Client may terminate the Advisory Agreement without penalty (full refund or no fees due) within 5 business days of signature on the Client Agreement. After such time, Portfolio Supervisory Services may be immediately terminated after one year upon receipt of written notice by either party. If the termination occurs prior to the end of a fee quarter, a pro-rata refund of unearned fees will be made to the Client.

### C. FEES ASSOCIATED WITH INVESTING

Clients are responsible for the payment of all third party fees associated with investing. Clients may pay transaction and brokerage commission to their broker/dealer or other service providers ("*Financial Institution[s]*") as well as any fees associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, retirement plan, trust fees, and all such applicable third party fees, deferred sales charges, oddlot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. All fees

## **ITEM 5: FEES AND COMPENSATION**

### **(Continued)**

paid to the Adviser for advisory services are separate from the fees and expenses charged to shareholders of ETF's or mutual fund shares offered by mutual fund companies. If a mutual fund previously purchased by or selected by a client should impose a sales charge, a client may pay an initial or deferred sales charge. Weick & Associates does not receive any portion of these investment-related fees. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fees. A complete explanation of the expenses charged by a mutual fund or ETF is contained in the respective mutual fund prospectus. Clients are encouraged to read each prospectus and securities offering documents.

#### **D. PREPAYMENT OF FEES**

Weick & Associates collects fees monthly and in advance in connection with Investment Supervisory Services.

Advisory clients/investors who do not receive the Adviser's Form ADV Part 2a and 2b at least 48 hours prior to engagement have the right to terminate the Adviser's services within 5 business days of signature without penalty (no fees due or prepaid fees will be promptly refunded). Alternatively:

Investment Supervisory Services are ongoing until either party receives notice of termination. Either party may terminate services with written notice and where services are terminated prior to the end of a calendar month, the Adviser will promptly return a pro-rated refund of unearned pre-paid fees.

#### **E. OTHER COMPENSATION FOR THE SALE OF SECURITIES OR OTHER INVESTMENT PRODUCTS TO CLIENTS**

Weick & Associates is a *fee-only* Registered Investment Adviser.

Neither Weick & Associates nor its supervised persons accept any compensation/commission for the recommendation of securities or insurance products including asset-based sales charges or service fees from the sale of mutual funds.

From time to time, the Adviser may review risk-management issues upon request. However, the Adviser will not undertake a review or provide recommendations on issues relating to property and/or casualty insurance. Since this type of coverage is important, clients should seek the services of a licensed property and casualty firm.

## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Weick & Associates' fees associated with services are not "performance based" (based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract). The fees noted herein represent fees for advisory services only.

## **ITEM 7: TYPES OF CLIENTS AND MINIMUM CONDITIONS**

Weick & Associates generally provides investment advice to individuals, trusts, estates, limited partnerships, and on occasion, charitable organizations.

Weick & Associates requires a minimum relationship size of \$5 million for Clients retaining Investment Supervisory Services. The Adviser reserves the right to decline services to any person or firm and for any reason.

## **ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES**

Weick & Associates provides individualized services to its clients. Based upon information provided by the client, the Adviser attempts to evaluate an investor's risk tolerance, time horizon, goals and objectives through an interview and data-gathering process in an effort to determine an investment plan or portfolio to best fit the investor's profile. Client participation and the client's delivery of accurate and complete information are critical to the Adviser's process.

In performing its services, the Adviser shall not be required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

The Adviser may recommend the services of itself, its Advisory Representatives in their individual capacities as investment managers, and other professionals to implement its recommendations. Any professional referrals (*i.e.*, insurance firms, accounting professionals, tax preparers, legal professionals, etc.) are *solely* a courtesy and the Adviser receives no direct or indirect compensation as a result of referrals. Clients are welcome but are never under any obligation to act upon any of the recommendations made by the Adviser or to engage the services of any such recommended service firm or professional including the Adviser itself.

**ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES  
AND RISK OF LOSS  
(Continued)**

The Adviser seeks to take an independent, balanced approach to the management of client investment portfolios. After working with the client to identify short-term and/or long-term financial goals, a strategic investment framework can be tailored to address these objectives.

The Adviser provides individualized Investment Supervisory Services to its clients. The Adviser can provide advisory services for portfolios ranging from moderately aggressive to conservative, each designed to meet the varying needs of and within the direction set forth by the investors. The Adviser selects the portfolio best suited to their individual needs after clients have defined their objectives, risk tolerance and time horizons and the selection is approved by the client.

**1. Fundamental Analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

For example, an investor can perform fundamental analysis on a bond's value by looking at economic factors, such as interest rates and the overall state of the economy, and information about the bond issuer, such as potential changes in credit ratings. For assessing stocks, this method uses revenues, earnings, future growth, return on equity, profit margins and other data to determine a company's underlying value and potential for future growth. In terms of stocks, fundamental analysis focuses on the financial statements of the company being evaluated.

Very broadly described, this type of analysis involves a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and company-specific factors (like financial condition and management).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). This method of security analysis is considered to be the opposite of technical analysis.

Fundamental analysis is performed on historical and present data, but with the goal of making financial forecasts.

**ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES  
AND RISK OF LOSS  
(Continued)**

There are several possible objectives:

- to conduct a company stock valuation and predict its probable price evolution,
- to make a projection on its business performance,
- to evaluate its management and make internal business decisions,
- to calculate its credit risk.

**2. Technical Analysis** is a method of evaluating securities by analyzing the statistics generated by market activity, such as past prices and volume. Generally speaking, technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity.

The field of technical analysis is based on three assumptions:

1. The market discounts everything.
2. Price moves in trends.
3. History tends to repeat itself.

This type of analysis can be broadly described as a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. It is a discipline for forecasting the direction of prices through the study of past market data, primarily price and volume. Technical analysts lean towards the belief that the historical performance of stocks and markets are likely indications of future performance.

**3. Charting** The Adviser may consider data obtain via charting analysis although it is not relied upon heavily. In the very basic sense, charting involves the analysis of investment charts for patterns that can be used to formulate investment strategies.

A head and shoulders (HAS) pattern is a bearish pattern that signals that a stock has peaked after a run up. One should then expect the stock to begin to fall in price. For a HAS pattern to develop, a stock must be in an up-trend (new lows are getting higher and new highs are getting higher), reach some maximum value (the head), and then fall and fail to reach the old high during the next upward movement (the right shoulder). Note that the peak and fall before the head was formed was the left shoulder.

A Cup and Handle (CAH) pattern is a bullish trend that occurs after a stock has dropped. During the cup phase investors are waiting to see if the stock has finally bottomed out, and therefore the price tends to be fairly flat. During the handle formation, the stock price finally moves up enough to convince investors that it is time to enter again as the price breaks out of the range formed during the cup phase.

**ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES  
AND RISK OF LOSS  
(Continued)**

When the stock falls back at the end of the handle but stays above the level of the cup, the stock is now in an up-trend, so people start to buy.

**4. Other.** Weick & Associates' investment strategies may be based upon a number of concepts and determined by the type of investor. Services are customized for each individual client. The concept of asset allocation, or spreading investments among a number of asset classes (domestic stocks vs. foreign stocks; large cap stocks vs. small cap stocks; corporate bonds vs. government securities) is generally in the forefront of our strategies. At its heart, asset allocation seeks to achieve the most efficient diversification of assets, to help lessen risk while not sacrificing the effectiveness of the portfolio in an effort to help yield the client's objectives. Since risk reduction is a key element to long-term investment success, asset allocation principles are a key part of the Adviser's overall approach in preparing advice for clients.

The Adviser does not utilize market timing strategies and takes the position that markets are efficient. Weick & Associates takes the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict the movement of the economy.

In certain situations, the Adviser may assist clients who wish to more actively trade securities. In such cases, the Client and Adviser may devise various strategies in order to generate short-term gains. The Adviser's short-term investment strategies may not be appropriate for every investor. The Adviser reserves the right to decline to offer services to any investor and for any reason and investors interested in the short-term strategies should be able to sustain a possible total loss of investment.

The Adviser seeks to minimize trading costs and the impact of investments on taxes. To this end, the Adviser generally sets target ranges for the percentage of assets in each asset class. These ranges are not intended to attempt to time the market, but instead to provide flexibility to reduce trading activity and taxable income. Within each asset class, the Adviser will typically seek to construct broadly diversified portfolios using individual securities or other types of investments. The Adviser does not invest in mutual funds as purchasing individual securities in a particular asset class generally allows for sufficient diversification consistent with reasonable trading costs and may provide for more tax advantages.

While Weick & Associates will typically recommend investments individual securities, the Adviser may assist the client with other investments such as: Exchange traded funds and other types of investments. Depending on the needs of a client, the Adviser may evaluate or offer advice on U.S. Government securities, tax-exempt municipal bonds, and other fixed-income securities. The Adviser will attempt to construct a diversified portfolio of investments that are within its realm of expertise. Additionally, if requested and based upon information provided by the client, the Adviser can prepare an evaluation of existing portfolio investments and provide recommendations for other investments as deemed appropriate.

**ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES  
AND RISK OF LOSS  
(Continued)**

Portfolio holdings or recommendations are generally judged by track record and performance of like-kind investments. The Adviser will actively manage each portfolio. Investors should expect to remain fully invested within the ranges of their selected asset allocation plan at all times unless restated by the client.

Changing conditions in the client's financial life or significant changes in market conditions may warrant a collaborative effort with the client to modify their strategic investment framework, which consequently may also trigger changes to investment holdings within the portfolio.

Portfolio additions may be in cash or securities provided that the Adviser reserves the right to liquidate any transferred securities, or decline to accept particular securities into the client's account. The Adviser may consult with its clients about the options and ramifications of transferring securities. However, clients are hereby advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charge) and/or tax ramifications.

Numerous publicly available sources of economic, financial and investment research are used by the Adviser. Asset allocation software and historical performance modeling software may also be utilized.

*It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.*

**B. MATERIAL RISKS INVOLVED**

Weick & Associates takes the general position that investors with diverse portfolios have a better chance of making a profit because it is difficult to accurately predict the movement of the economy.

The Adviser can use any or all of these different but somewhat complementary methods for investment selections. No single strategy can be relied upon to outperform the market. As outlined below, Weick & Associates' goal in its analysis is not to time the market.

Weick & Associates generally utilizes long-term trading; short-term trading; short sales; margin transactions; options writing strategies (including covered options, uncovered options, or spreading strategies). The Adviser does not utilize mutual funds. Weick & Associates may also recommend exchange traded funds (ETFs).

Weick & Associates seeks to utilize investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Short sales, margin transactions and options writing generally hold greater risk

**ITEM 8: METHOD OF ANALYSIS, INVESTMENT STRATEGIES  
AND RISK OF LOSS  
(Continued)**

and clients should be aware that there is a chance of material risk of loss using any of those strategies.

Clients may make additions to and withdrawals from the account at any time, subject to the Adviser's right to terminate an account. Clients may withdraw account assets on notice to the Adviser, subject to the usual and customary securities settlement procedures. The Adviser generally designs its client portfolios as long-term investments and assets withdrawals may impair the achievement of a client's investment objectives. Additions may be in cash, cash equivalents and securities provided that the Adviser reserves the right to liquidate any transferred securities, or decline to accept particular securities into a client's account. In the case of previously held investments purchased through a financial services firm other than the Adviser, clients should be aware that when transferred securities are liquidated, they may be subject to transaction fees, fees assessed at the mutual fund level (*i.e.*, contingent deferred sales charge) and/or tax ramifications.

Clients may choose to make self-directed securities transactions, which are investments that are not reviewed and/or not recommended by the Adviser. In such cases, the Adviser has not passed on the suitability of said investments and while the Adviser may assist with client-directed implementation as a value-added service at the client's request, the Adviser will not manage these types of investments unless agreed in writing.

*It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.*

**C. RISKS OF SPECIFIC SECURITIES UTILIZED**

Weick & Associates generally seeks investment strategies that do not involve significant risk or unusual risk beyond that of the general domestic and / or international equity markets.

The Adviser does not recommend private placement securities.

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



## **ITEM 9: DISCIPLINARY INFORMATION**

There are no legal or disciplinary events in the Adviser's background. There exists no material business information that would impact a prospective or current client's evaluation of Weick & Associates or the integrity of its management. The Adviser has not been involved in any criminal or civil actions; administrative proceedings before the SEC or any other federal, state or foreign regulatory authority. The Adviser has not been the subject of any self-regulatory organization proceedings. Information pertaining to the officer(s) and advisory representative(s) of Weick & Associates are contained on ADV Part 2B which is attached to this section.

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### **A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE**

Neither Weick & Associates nor its representatives are registered as a broker/dealer or as Representatives of a broker/dealer.

### **B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR OR A COMMODITY TRADING ADVISER**

Neither Weick & Associates nor its representatives are registered as a FCM, CPO or a CTA.

### **C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST**

Neither Weick & Associates nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

**ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES  
AND AFFILIATIONS  
(Continued)**

Weick & Associates does not maintain registration relations with any of the following:

- broker-dealer, municipal securities dealer, or government securities dealer or broker
- investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund,” and offshore fund)
- other investment adviser or financial planner
- futures commission merchant, commodity pool operator, or commodity trading advisor
- banking or thrift institution
- accountant or accounting firm
- lawyer or law firm
- insurance company or agency
- pension consultant
- real estate broker or dealer
- sponsor or syndicator of limited partnerships.

Weick & Associates does not operate and does not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

**D. SELECTION OF OTHER ADVISORS OF MANAGERS AND HOW THIS ADVISER IS COMPENSATED FOR THOSE SELECTIONS**

Weick & Associates does not utilize nor select other advisers or third party managers. All assets are managed by Weick & Associates.

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR  
INTEREST IN CLIENT TRANSACTIONS  
AND PERSONAL TRADING**

**A. CODE OF ETHICS**

Weick & Associates takes the issue of regulatory compliance seriously and is committed to maintain compliance with federal and applicable state securities laws. Additionally, Weick & Associates has a position of public trust and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable.

Weick & Associates places great value on ethical conduct. Therefore, the ultimate goal of our internal policies is to challenge our staff to live up not only to the letter of the law, but also to the ideals set forth by the Adviser. Clients may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT  
TRANSACTIONS AND PERSONAL TRADING**  
*(Continued)*

Investment Adviser, Weick & Associates is a fiduciary to each and every client. As fiduciaries, Investment Advisors owe their clients several specific duties. According to the SEC, an Investment Adviser's fiduciary duties include:

- ❖ Providing advice that is suitable;
- ❖ Providing full disclosure of material facts and potential conflicts of interest (such that the client has complete and honest disclosure in order to make an informed decision about services of the Adviser and about investment recommendations);
- ❖ The utmost and exclusive loyalty and good faith;
- ❖ Best execution of transactions under the available circumstances;
- ❖ The Adviser's reasonable care to avoid ever misleading clients;
- ❖ Only acting in the best interests of clients.

It is Weick & Associates' policy to protect the interests of each of the Adviser's clients and to place the clients' interests first and foremost in each and every situation. The Adviser will abide by honest and ethical business practices to include, but not limited to:

- ❖ The Adviser will not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- ❖ The Adviser will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the customer and we will document suitability.
- ❖ The Adviser and its Representatives will not borrow money from clients.
- ❖ Weick & Associates will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registration in states where we provide investment advice and based upon information the Adviser receives.
- ❖ The Adviser will not recommend that the client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of a broker/dealer that is not licensed, based upon information available to the Adviser.

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT  
TRANSACTIONS AND PERSONAL TRADING**  
*(Continued)*

- ❖ The staff of the Adviser will report all required personal securities transactions to Edward Weick, the Chief Compliance Officer as required by the SEC. Reportable trades for this Adviser include all but the following exceptions::
  - Transactions effected pursuant to an automatic investment plan;
  - Securities held in accounts over which the access person has no direct or indirect influence or control;
  - Transactions/holdings in direct obligations of the US Government;
  - Money market instruments — bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high quality short-term debt instruments;
  - Shares of money market funds;
  - Transactions and holdings in shares of mutual funds are not reportable, since the Adviser does not have a material relationship with an investment company which would otherwise require reporting;
  - Transactions in units of a unit investment trust are not reportable if the UIT is invested exclusively in unaffiliated mutual funds.

All applicable securities rules and regulations will be strictly enforced. Weick & Associates will not permit and has instituted controls against insider trading. Advisory Representatives and administrative personnel who do not follow the Adviser's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the SEC and/or state securities regulators.

Clients are welcome to request a copy of the Adviser's Code of Ethics by contacting the Adviser's office.

The Adviser emphasizes the unrestricted right of clients to decline to implement any advice rendered, in whole or part. Where the Adviser is granted discretionary authority of the client's accounts, clients are welcome to set investment parameters and/or limitations in writing and such direction is followed until such time the client's instructions are amended in writing.

**B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS**

Weick & Associates does not recommend that clients buy or sell any security in which any of Weick & Associates' related persons have a material financial interest.

**ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT  
TRANSACTIONS AND PERSONAL TRADING**  
*(Continued)*

**C. INVESTING PERSONAL MONIES IN THE SAME SECURITIES AS CLIENTS**

Weick & Associates and/or individuals associated with Weick & Associates may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. Thus, at times the interests of the Adviser's or staff members' accounts may coincide with the interests of clients' accounts. However, at no time will the Adviser or any related person receive an added benefit or advantage over clients with respect to these transactions nor will the Adviser nor its associated persons will not place itself in a position to have added benefit as a result of advice given to clients. The Adviser's Chief Compliance Officer monitors the personal trading activities of advisory personal.

**D. TRADING SECURITIES AT/AROUND THE SAME TIME AS CLIENTS'  
SECURITIES**

Weick & Associates acknowledges the Adviser's fiduciary responsibility to place the investment needs of clients ahead of the Adviser and its staff. The interests of clients are held in the highest regard. At no time will the Adviser or any related person receive an added benefit or advantage over clients with respect to these transactions. The Adviser and its associated persons will not place itself in a position to have added benefit as a result of advice given to clients.

The staff of Weick & Associates 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.

The Adviser has established trading policies for its access persons. Edward Weick, the Chief Compliance Officer of Weick & Associates, is responsible for the monitoring of personal trading conducted by staff.

**ITEM 12: BROKERAGE PRACTICES**

**A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS**

Weick & Associates considers the full range and quality of a broker's services in placing brokerage including, among other things, the value of services provided to clients, execution capability, research provided, commission rate, financial responsibility, and responsiveness to Weick & Associates. In this light, the determinative factor is not necessarily the lowest possible commission cost but whether the transaction represents the best qualitative execution for the supervised account.

## **ITEM 12: BROKERAGE PRACTICES**

**(Continued)**

Weick & Associates suggests the services of Pershing, LLC for custodial and execution services. The Adviser participates in Pershing Advisor Solutions, an institutional program for independent registered investment advisers.

Weick & Associates also utilizes various additional firms for DVP purposes. Recommendations are based upon the reputation of the broker, execution of services to clients, commission rates, types of services provided to the client as well as services provided to the Adviser on behalf of clients.

Pershing, LLC ("*Pershing*") is a leading provider of investment, asset and fund administration, fiduciary and banking solutions for corporations, institutions and affluent individuals worldwide.

Pershing offers outstanding services to Weick & Associate's clients and professional services to the Adviser. Additionally, Pershing offers secure online services and utilizes cutting-edge technology to provide superior data security and accuracy of information.

Weick & Associates recognizes its duty to execute securities transactions for clients in such a manner that the clients' total costs or proceeds in each transaction are the most favorable under the circumstances. The decision to utilize the preferred broker/dealer is based upon the customer service provided to investors and the services available to the Adviser. Weick & Associates believes that excellent customer service, trade execution and services that allow the Adviser to better serve its Clients, is superior to most non-service oriented, discount and Internet-based brokers that may otherwise be available to the public. The decision to utilize the preferred custodial firm is also based upon a number of factors:

- ❖ Quality of overall execution services provided;
- ❖ Promptness of execution;
- ❖ Creditworthiness, financial condition, and business reputation of the broker-dealer;
- ❖ Research (if any) provided;
- ❖ Promptness and accuracy of reports on execution;
- ❖ Ability and willingness to correct errors;
- ❖ Promptness and accuracy of confirmation statements;
- ❖ Ability to access various market centers;
- ❖ The broker-dealer's facilities and technology;
- ❖ The market where the security trades;
- ❖ Any expertise in executing trades for the particular type of security;
- ❖ Commission charged;
- ❖ Reliability of the broker-dealer;
- ❖ Ability to use ECNs to gain liquidity, price improvement, lower commission rates and anonymity;
- ❖ Execution and operational capabilities of the broker-dealer.

## **ITEM 12: BROKERAGE PRACTICES**

***(Continued)***

The Adviser monitors the service providers' best execution documentation. The Adviser anticipates that current execution information will also be provided by its service providers on request. Among the factors the service providers consider include: The amount of net price improvement, speed of execution, certainty of execution, cost of execution, service issues, reliability, credit worthiness of counterparties, and accessibility. Pershing indicates it regularly and rigorously monitors execution quality. Generally the larger service providers compare the reported executions and unexecuted orders to the National Best Bids and Offers (NBBO's) at the time of order entry and identify a subset of items that require review.

While it is possible that clients may pay higher commission or transactions fee through preferred services providers, Weick & Associates has determined Pershing currently offer the best overall value to the Adviser and its clients for the service, brokerage and technology provided. Pershing is a large and sophisticated order sender.

As previously noted in this Schedule, Clients can expect to incur transaction fees for the purchase and sale of individual securities; Weick & Associates does not receive any portion of these fees. Clients can expect to receive standard account statements from brokerage firms either monthly or quarterly and when transactions occur.

Weick & Associates is a fee-only Registered Investment Adviser. Affiliates of Weick & Associates are not registered representatives of any broker/dealer and therefore do not receive commissions as a result of recommending the services of these firms. Please reference the disclosure at Item 13 concerning additional service benefits received.

The Adviser may utilize the custodian's prime broker program whereby the custodial firm may effect clients' over-the-counter securities transactions on an agency basis. Typically, the service providers execute transactions based upon a number of factors. These factors include: Size of order, trading characteristics of the security, favorable execution prices, access to reliable data, availability of efficient transaction processing and possible price reductions. In filling these orders, the service provider may transact with a market-making broker-dealer ("market maker") on the other side of the trade. A market maker may mark-up/down the price of securities for which it makes a market, which is a cost that will be incurred by the client in addition to any agency commissions assessed by the client's service provider. Normally, best price and execution is obtained for over-the-counter securities transactions by executing directly with the market maker on a principal basis. Therefore, in some cases, clients may incur transaction costs, in addition to any commissions charged by their services provider, when trades in over-the-counter securities are effected on their behalf through that broker on an agency basis. The Adviser's choice to utilize the service provider's prime broker program or similarly termed service available through the selected service provider may limit or eliminate the Adviser's ability to obtain best price and execution in each case. In certain cases, a security may be purchased through another service provider and in such cases, the security purchased is then transferred to the client account at the client's selected custodian, and a "trade away" delivery fee is assessed to the client account. Clients are welcome to direct use of their preferred service provider, in which case the Adviser may

not be able to provide best execution, because of limitations that may be placed on the Adviser by the client's service provider.

## **ITEM 12: BROKERAGE PRACTICES** **(Continued)**

### **1. RESEARCH AND OTHER SOFT DOLLAR BENEFITS**

As noted above, Weick & Associates utilizes the services of Pershing. However, Weick & Associates may, from time to time, direct Pershing to "step out" a portion of the commissions resulting from client transactions as further described below:

As fiduciaries, investment advisers are obligated to act in the best interest of their clients, and cannot use client assets (including client commissions) to benefit themselves, absent client consent. Advisers who obtain brokerage and research services with client commissions do not have to purchase those services with their own funds, which creates a conflict of interest for the Advisers. However, Section 28(e) of the Securities Exchange Act of 1934 provides a safe harbor for firms that exercise investment discretion over accounts to pay for research commission dollars generated by account transactions ("soft dollars"). Direct Access Partners ("DAP") is a company that is available to provide soft dollar services to Advisers which qualify under the available safe harbor.

Weick & Associates' process involves directing Pershing to "step out" a certain amount of commissions generated to Direct Access Partners (DAP). Weick and Associates uses the step out commissions to pay for soft dollar research for the benefit of all clients. The Adviser receives credit for research on a 1-1 basis. The contractual relationship that exists between Weick & Associates and DAP does not result in a mixed-use soft dollar arrangement since the product or service received is only research-related.

Section 28(e) provides a safe harbor that protects advisers from liability for a breach of fiduciary duty solely on the basis that they paid more than the lowest commission rate in order to receive "brokerage and research services" provided, if the Chief Compliance Officer determines in good faith that the amount of the commission was reasonable in relation to the value of the brokerage and research services received.

Weick & Associates may pay slightly more than the lowest rate of commissions available in order to obtain various research services. However, Weick & Associates has determined in good faith and after periodic (and ongoing) review, that the fees are reasonable in relation to the full range and quality of the brokerage and research services provided, viewed in terms of either particular transactions or the Adviser's overall responsibilities with respect to the accounts over which it exercises investment discretion. The determinative factor is whether transaction fees represent the best qualitative execution services for our managed accounts.

In addition to the aforementioned services, Weick & Associates may also regularly receive from the preferred service providers regular and specific research information generally delivered in an electronic format.



## **ITEM 12: BROKERAGE PRACTICES**

***(Continued)***

The needs of our clients, the quality of services provided to our clients, and the overall benefit of placing trades with particular brokers are weighed carefully in each situation.

Additionally, in the course of determining fair and reasonable services, Weick & Associates works to negotiate the most reasonable costs available in light of the services provided.

Weick & Associates periodically and systematically evaluates execution performance of broker/dealers executing our transactions and the benefits received from other service providers. Clients are welcome to inquire about our mixed-use soft dollar arrangement and our trading practices.

### **2. BROKERAGE FOR CLIENT REFERRALS**

Weick & Associates receives no referrals from a broker/dealer or third party in exchange for using that broker/dealer or third party.

### **3. CLIENTS DIRECTING WHICH BROKER/DEALER/CUSTODIAN TO USE**

Investment Supervisory clients are welcome to utilize any service provider they may choose and are welcome to implement any advice or recommendations in whole or in part.

Clients are welcome to utilize the service provider of their choice, and in such cases, will direct the Adviser to use their firm of choice (via written direction). If the client requests the Adviser to arrange for the execution of securities brokerage transactions for the client's account, the Adviser shall direct such transactions through their selected broker-dealer until alternative directions are provided in writing.

As disclosed in the Adviser's Client Agreement, the Adviser cannot guarantee best execution of transactions in these cases, due to limitations that may be imposed by the client's service provider either on the Adviser or in connection with transactions.

In such cases, the client will negotiate terms and arrangements for the account with that broker-dealer, and the Adviser will not seek better execution services or prices from other broker-dealers or be able to "batch" client transactions for execution through other broker-dealers with orders for other accounts managed by the Adviser (as described below). As a result, the client 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. Subject to its duty of best execution, the Adviser may decline a client's request to direct brokerage if, in the Adviser's sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

## **ITEM 12: BROKERAGE PRACTICES**

**(Continued)**

### **B. AGGREGATION (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS**

Weick & Associates may aggregate (or bunch) trades when executing transactions for its various clients in order to realize more effective trade execution and the cost efficiencies that come from executing larger order sizes. In each case, the Adviser strives to allocate investment opportunities or trades among its Clients in a manner that is fair and equitable and based upon the Clients' investment objectives. Weick & Associates will prepare an internal allocation statement that is effected in an objective manner, specifying the participating Client accounts and the Adviser's allocation plan which outlines how the Adviser will allocate orders among the selected Client accounts. The objective is to ensure that, based upon the individual needs and financial objectives of its various Clients (taking into consideration any restrictions or limitations), the Adviser distributes investment opportunities among Client accounts in a rational and predictable manner so that the distribution is equitable. Deviations from the allocation methodology are stated up front in internal documentations and are permitted only for good cause under the direction of Edward Weick, President and Chief Compliance Officer. Examples of some circumstances that might warrant a deviation include account types, available cash, tax considerations, particular investment guidelines, Client-imposed restrictions, etc. Each internal statement will document any special considerations. Each Client is provided with individualized investment advice. Clients are encouraged to discuss any questions that may arise regarding investment policies throughout the course of our engagement.

**Trade error policy:** The Adviser requires its personnel to carefully implement investment decisions. Nevertheless, if a trade error occurs, it is the Adviser's policy to correct the error as soon as possible and in such a manner that the affected client is not disadvantaged and bears no loss. The Adviser utilizes a trade error account at Pershing, as needed, to process trade error reimbursements. Pershing's policy on trade errors is to reimburse clients for any loss if the amount is \$100 or less. If the loss is greater than \$100 the Adviser will reimburse the client for a loss.

If an investment gain results from the correcting trade, the gain will remain in your account unless the same error involved other client account(s) that should have received the gain, it is not permissible for you to retain the gain, or we confer with you and decide to forego the gain (e.g., due to tax reasons). If the gain does not remain in your account it will be transferred to the Adviser's trade error account.

Generally, if related trade errors result in both gains and losses in your account, they may be netted.

## **ITEM 13: REVIEW OF ACCOUNTS**

### **A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO CONDUCTS THE REVIEWS**

Investment Supervisory Services involve frequent monitoring of portfolios. Portfolios are reviewed at least monthly but most portfolios are reviewed daily. Principal reviews will be performed by Edward Weick, the President and Chief Compliance Officer. Portfolios are analyzed for asset allocation, safety and security, gains and losses and investment income in relationship to the Client's investment objectives, risk profile, tax situation and market conditions. A master list of all securities holdings is maintained and monitored regularly. Edward Weick conducts occasional Client meetings and has frequent telephonic contacts in which investment objectives, market conditions and other factors are discussed with Clients.

Advisory personnel may assist with general client services and administrative duties. Edward Weick is responsible for all decisions, account reviews and primary Client contacts.

Individual portfolio reviews (with clients) are conducted as requested by the client. The Adviser prefers clients initiate meetings (telephonically, electronically or in person) no less than annually. However, clients are obligated to contact the Adviser when there exists a real or potential change in the clients' financial condition. *This prompt notification gives the Adviser the opportunity to review the clients' new information and determine if it impacts the advice and recommendations prepared for the client..* Reviews are conducted by Advisory Representatives.

### **B. FACTORS THAT WILL TRIGGER NON-PERIODIC REVIEWS OF CLIENT ACCOUNTS**

Reviews may also be triggered by material market, economic or political events. Reviews may occur as a result of reported changes in the client's financial situation (which may include but are not limited to: Termination of employment, a change in the family dynamic, relocation, inheritance or retirement).

### **C. CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED TO CLIENTS**

Clients can expect to receive confirmation statements from all transactions and a monthly/quarterly statement, directly from their custodial firm. The custodian's quarterly reports detail account value, net change, portfolio holdings, and all account activity.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

### **A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)**

Weick & Associates does not receive any economic benefit, directly or indirectly from any third party in connection with advisory services provided to Weick & Associates clients.

### **B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS**

Weick & Associates does not directly or indirectly compensate any person for client referrals who is not part of Weick & Associates' advisory personnel.

## **ITEM 15: CUSTODY**

Weick & Associates does not take custody of client accounts (funds or securities) at any time. Custody of clients' accounts is held at Pershing. Clients will receive regular and customary account statements from the custodian and should carefully review those statements.

In all cases, clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities. Execution of transactions and custody of client funds and securities are services provided by Pershing.

## **ITEM 16: INVESTMENT DISCRETION**

Clients engaging the Adviser for Investment Supervisory Services have the ability to leave standing instructions with the Adviser to refrain from investing in particular industries, invest in limited amounts of securities and to re-balance portfolios (also termed as "limited discretion").

With the client's authorization as provided in the custodial account forms and the Adviser's Client Agreement, Weick & Associates will maintain limited discretionary trading authority to execute securities transactions in the investor's portfolio within investor's designated investment objectives, to include the securities to be bought and sold, and the amount of securities to be bought and sold. Weick & Associates will never have full power of attorney nor will the Adviser ever have authority to withdraw funds or to take custody of investor funds or securities other than the ability to deduct advisory fees via investor's qualified custodian and only with client authorization.

## **ITEM 17: VOTING CLIENT SECURITIES (PROXIES)**

Clients retain the authority to vote proxies. The Adviser requires that investors ensure proxy ballots are mailed directly to each investor or an authorized third party.

The Adviser will not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies.

## **ITEM 18: FINANCIAL INFORMATION**

### **A. BALANCE SHEET**

Weick & Associates does not require nor solicit prepayment of more than \$500 in fees per client and six months or more in advance of services. The Adviser's fees are prepaid only 30 days in advance. The Adviser does not maintain custody of client funds or securities and is therefore not required to include a balance sheet with this Brochure.

### **B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR THE ADVISER'S ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS**

Neither Weick & Associates nor its management have a financial condition that is likely to reasonably impair the Adviser's ability to meet contractual commitments to clients.

### **C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS**

Weick & Associates has never been the subject of a bankruptcy petition.