



FORM ADV PART 2A  
FIRM BROCHURE  
MARCH 11, 2016

This brochure provides information about the qualifications and business practices of WT Wealth Management, LLC and its registered investment adviser representatives. Any questions about the contents of this brochure may be directed to WT Wealth Management, LLC by calling (800) 825-0616 or emailing [jheilner@wtwealthmanagement.com](mailto:jheilner@wtwealthmanagement.com). 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. Additional information about WT Wealth Management also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site may be searched by a unique identifying number known as a CRD number. WT Wealth Management, LLC's CRD number is 169566.

## **ITEM 2 MATERIAL CHANGES**

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This version of Part 2A of Form ADV ("Firm Brochure") and Part 2B of Form ADV ("Supplement Brochure"), dated **March 11, 2016**, is our renewal brochure document. It contains information about our business practices as well as a description of potential conflicts of interest relating to our advisory business which could affect a client's account with us. We are providing this material in accordance with Rule 204-3 of the Investment Advisers Act of 1940 and Arizona Revised Statutes § 44-3153(B), which requires a registered investment adviser to provide a written disclosure statement upon entering into an advisory relationship.

### **Material Changes Since the Last Update**

WT Wealth Management, LLC ("WTWM") has changed its principal place of business from Wyoming to Arizona and subsequently WTWM has initiated a transition to state registration status with the State of Arizona and will withdraw from its SEC registration.

### **Full Brochure Available**

We will provide a new version of the Firm Brochure as necessary when updates or new information are added, at any time, without charge. Request a complete copy of our Firm Brochure, by contacting us by telephone at **(800) 825-0616** or by email at: **Jheilner@wtwealthmanagement.com**.

### ITEM 3      TABLE OF CONTENTS

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Item 1	Cover Page.....	0
Item 2	Material Changes.....	i
Item 3	Table of Contents .....	ii
Item 4	Advisory Business.....	1
Item 5	Fees and Compensation .....	4
Item 6	Performance-Based Fees .....	5
Item 7	Types of Clients.....	5
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Item 9	Disciplinary Information .....	8
Item 10	Other Financial Industry Activities and Affiliations .....	9
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12	Brokerage Practices .....	10
Item 13	Review of Accounts.....	12
Item 14	Client Referrals and Other Compensation .....	12
Item 15	Custody.....	13
Item 16	Investment Discretion.....	14
Item 17	Voting Client Securities .....	14
Item 18	Financial Information.....	14
Item 19	Requirements for State-Registered Advisers.....	14
	Privacy Policy .....	16
	<b>Brochure Supplement (Part 2B of Form ADV) – John Heilner.....</b>	<b>17</b>
	<b>Brochure Supplement (Part 2B of Form ADV) – Robert F. Redwanc.....</b>	<b>20</b>
	<b>Brochure Supplement (Part 2B of Form ADV) – Eileen M. Proud.....</b>	<b>23</b>

## **ITEM 4      ADVISORY BUSINESS**

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### **A. FIRM DESCRIPTION**

WT WEALTH MANAGEMENT, LLC ("WTWM") is organized as a Wyoming limited liability company that was founded in 2013.

WTWM is a registered investment adviser based in Scottsdale, Arizona that is currently registered with the United States Securities and Exchange Commission ("SEC") as an investment adviser. WTWM is transitioning from SEC to state registration with the State of Arizona. WTWM's current business activity consists of providing wealth management services, wealth education services, and financial planning to its clients.

Principal Owner: The direct owner of WTWM is WesternTrust, L.P., a Delaware limited partnership. John Heilner is the executive officer of WT.

### **B. TYPES OF ADVISORY SERVICES**

#### **Investment Advisory Services**

WTWM provides discretionary portfolio management services to its clients, based on the specific needs and objectives of such persons and the suitability of products and services. WTWM shall be granted full discretion and authority to manage the client's account. Accordingly, WTWM is authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or to be sold without permission from the client prior to each transaction.

Prior to engaging WTWM to provide any of the aforementioned investment advisory services, WTWM requires a written investment management agreement ("IMA") signed by the client prior to the engagement of services. The IMA outlines the services and fees the clients will incur pursuant to the IMA with WTWM.

Upon request, WTWM will create an Investment Policy Statement for each client, which outlines the client's current situation (goals, objectives, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Investment Advisory Services include, but are not limited to, the following:

- Investment Strategy
- Asset Allocation
- Regular portfolio monitoring
- Personal Investment policy
- Security selection

As noted, our asset management services are designed to offer portfolio construction and ongoing management of accounts with defined investment strategies to meet the client's personal investment goals and objectives. WTWM evaluates the current investments of each client with respect to risk tolerance levels and time horizon. Risk tolerance levels may be documented in the Investment Policy Statement which is provided to our clients upon request. WTWM is responsible for providing ongoing re-balancing and continuous

monitoring of our clients' securities holdings.

WTWM generally limits its money management to open and closed end mutual funds, equities, bonds, fixed income and debt securities, ETFs, and REITs. WTWM may use other securities as well to help diversify a portfolio when applicable, and has the ability to service annuities, 529 plans, and other non-custodial accounts.

### **Wealth Education Services**

WTWM believes all investors should be encouraged to increase their knowledge, as education is a key component in empowering our clients to avoid behavioral mistakes that hinder a successful investing experience. We seek opportunities to teach principles that will enhance each client's accumulation, protection and enjoyment of wealth. WTWM believes in transparency and that clients have the right to ask questions, challenge our beliefs, receive forthright responses, and enjoy honest discussion about their investment portfolio.

In addition to one-on-one discussions with individual clients, WTWM may also conduct wealth educational events and outings (such as seminars and workshops) on various financial topics for our clients and the general public. Participants can increase their knowledge during these educational events and have the opportunity to ask specific questions by interacting with financial professionals and experts who will instruct such events.

Sample wealth education topics (whether addressed individually or in seminars and workshops) might include, but are not limited to:

- ✓ Financial Plans
- ✓ Estate Planning
- ✓ Succession Planning
- ✓ Financial Risk
- ✓ Asset Allocation Models
- ✓ Modern Portfolio Theory
- ✓ Investment Strategies
- ✓ Real Estate and Real Estate Investing
- ✓ Insurance (all types)
- ✓ Medicare or Social Security Enrollment and Administration
- ✓ Navigating the Affordable Care Act ("Obamacare")
- ✓ Tax Planning and Filing
- ✓ Financial Negotiation Skills

### **Financial Planning Services**

WTWM may provide additional advisory services in the form of financial planning services. Financial planning services do not involve the active management of client accounts, but instead focus on a client's overall financial situation. Financial planning can be described as helping individuals determine and set their long-term financial goals through

investments, tax planning, asset allocation, risk management, retirement planning, and other areas. The role of the financial planner is to find ways to help the client understand his/her overall financial situation and help the client set financial objectives.

### **C. TAILORED RELATIONSHIPS**

WTWM offers the same suite of services to all of its clients. The management services and recommendations offered by WTWM are based on the individual needs of our clients and the suitability of products and services. Specific client financial plans and their implementation are dependent upon the client's Investment Policy Statement which outlines each client's current situation (income, objectives, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs and targets.

Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values and beliefs. WTWM will make every effort to comply with the wishes of the client but cannot guarantee absolute adherence due to our use of indexed products, funds, and ETF's that are controlled by third party managers.

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

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a "bundled" form. In exchange for these "bundled" services, the clients pay an all-inclusive (or "wrap") fee determined as a percentage of the assets held in the wrap account. Due to the nature of its advisory services, WTWM does not participate in and is not a sponsor of wrap fee programs.

### **E. ASSETS UNDER MANAGEMENT**

When calculating regulatory assets under management, an Investment Adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services.

WTWM manages \$50,000,000 in client assets on a discretionary basis. This assets under management figure is based on calculations as of March 3, 2016.

### **SOLICITED OR SUB-ADVISED SEPARATELY MANAGED ACCOUNTS (SMA)**

WTWM provides investment management services to clients facilitated by unaffiliated independent investment advisors contractually engaged by WTWM (collectively referred to as "Introducing Advisors"). WTWM may also act as sub-advisor to an unaffiliated independent investment advisor. Under these arrangements, each account is held at an unaffiliated brokerage firm or custodian, and is registered to the person, persons, or other entity listed on that firm's new account forms. All securities are owned directly by the account's registered owner or owners. WTWM directs the investment of the securities in the account under a limited power of attorney granted to WTWM by the client. WTWM is compensated by the investment management fee as detailed in the contract with the client. The Introducing Advisor receives a fee disclosed in the contract with the client and may provide continuing financial planning or other services for the client.

## ITEM 5 FEES AND COMPENSATION

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### A. DESCRIPTION AND BILLING

In addition to the information provided in Item 4 (“*Advisory Business*”), this section provides details regarding WTWM’s services along with a description of each service’s fees and compensation arrangements. *Lower fees for comparable services may be available from other sources.*

#### **Investment Advisory Services**

WTWM will charge clients an investment management fee for its investment advisory services. The investment management fee is an annual fee based on a percentage of the value of the client’s assets under management, including all cash and other assets in the account (valued at liquidation value) (the “Account Value”), as follows:

WTWM charges clients a management fee ranging from 0% to 2% per annum, collected quarterly in advance on the first business day of each calendar quarter based on the fair market value of the assets in the Account at the close of business on the last day of the previous quarter. The initial quarterly payment will be due at the time assets are allocated to the Account and will be based on the amount of such assets. All fees are refundable if the relationship terminates before the end of the period for which the fee is paid. Please see Section C for full Refund and Termination Policy.

The investment management fee charged is subject to negotiation with each client based on the client’s characteristics and may differ from client to client. The following factors are taken into consideration when determining the investment management fee to be charged: the relationship of the client to the Firm (family member, friend or no relation), the size of the account, the client’s desired level of involvement, the types and complexity of securities in the account and whether the account is custodial or non-custodial. All factors are considered equally. The IMA is valid for terms of one year with automatic one year renewals. Any changes, such as an increase or decrease to the investment management fee, may be made to the IMA in writing upon mutual agreement of the parties.

Any management fees due to WTWM shall be deducted by WTWM directly from the client’s account, and will be paid to WTWM from the amount on deposit in the client account. The client will provide written authorization permitting the fees to be paid directly from the account. Both WTWM’s advisory agreement and the custodial/ clearing agreement may authorize the custodian to debit the account for the amount of WT’s management fees and to directly remit that fee to WTWM in compliance with regulatory procedures. In the limited event that WTWM bills the client directly, payment in full is expected upon invoice presentation. WTWM reserves the right to waive or reduce fees at its discretion.

Lower fees for comparable services may be available from other sources.

#### **Financial Planning Services**

WT’s financial planning services are offered on a fixed or hourly fee basis. Where financial planning clients may choose to engage WTWM on an hourly basis such fees are billed at

a rate of \$250 per hour. The fixed fee rate is charged at \$250 per hour for an initial plan with an additional \$150 per hour charged to update an existing plan (originally created by WT).

The fees are negotiable on a case-by-case basis dependent on the amount of the assets and the complexity of the services. Compensation will be paid after all services have been rendered. All fees and refunds remain subject to negotiation at the sole discretion of WT.

#### **B. OTHER FEES AND PAYMENTS**

There may be additional fees or charges that result from the maintenance of or trading within a client's account. These are fees that are imposed by third parties in connection with investments made through a client's account, including but not limited to, no-load mutual fund 12(b)-1 distribution fees, certain deferred sales charges on previously purchased mutual funds, and IRA and Qualified Retirement Plan fees.

#### **C. REFUND AND TERMINATION POLICY**

Clients may terminate their account without penalty (full refund), within five (5) days of signing their advisory agreement, and thereafter at any time with thirty (30) days prior written notice to WT. Upon termination, the management fee for any partial period shall be prorated and any unearned amount shall be refunded to the client as of the effective date of the termination when requested in a written communication to WT. The client will not be entitled to a refund of any financial planning fees, regardless of when or for what reason the relationship between WTWM and the client is terminated.

#### **D. OTHER COMPENSATION**

Neither WTWM nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

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#### **A. PERFORMANCE-BASED COMPENSATION**

Performance-Based Fees ("Performance Fees") are based on a share of the capital gains or capital appreciation of the assets of a client. **WTWM does not assess Performance Fees.** Our fees are calculated as described in *Item 5* above.

#### **B. SIDE-BY-SIDE MANAGEMENT**

"Side-by-Side Management" refers to a situation in which the same adviser manages accounts that are billed based only on a percentage of assets under management and at the same time manages other accounts for which fees are performance-based.

**WTWM does not assess Performance Fees.**

### **ITEM 7 TYPES OF CLIENTS**

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WTWM generally provides investment advisory services to **Individuals and High Net-**



## **Worth Individuals.**

WTWM does not require a minimum account balance. We believe that every investor, large or small, deserves unbiased, uninfluenced, professional asset management services.

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

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### **A. METHODS OF ANALYSIS**

WTWM may utilize one or more of the following methods of analysis when providing investment advice to its clients:

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. It involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. 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 and to calculate its credit risk. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. It attempts to predict a future stock price or direction based on market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. Technical analysis methods employ software and other financial data management tools to assess various aspects of the marketplace. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Cyclical analysis** assumes that markets react in cyclical patterns which, once identified, can be leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical analysis is a time based assessment which incorporates past and present performance to determine future value. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

### **B. INVESTMENT STRATEGIES**

WTWM may utilize the following investment strategies when implementing investment advice given to clients:

**Long Term Purchases** – Securities are purchased with the expectation that the value of

those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen long-term changes in the company in which a client is invested or in the overall market. Long term trading is 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. Due to its nature, the long-term strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, and political/regulatory risk.

**Short Term Purchases** - Securities are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short term trading generally holds greater risk.

The investment strategies summarized above represent WTWM's current intentions. Depending on conditions and trends in the securities markets and the economy in general, WTWM may pursue any objectives, employ any investment techniques or strategies, or purchase any type of security that it considers appropriate and in the best interests of the client, whether or not described herein.

### **C. RISK OF LOSS**

*Clients need to be aware that investing in securities involves risk of loss of the principal.*

Every method of analysis has its own inherent risks. To perform an accurate market analysis WTWM must have access to current/new market information. WTWM has no control over the dissemination rate of market information; therefore, unbeknownst to WTWM, certain analyses may be compiled with outdated market information, severely limiting the value of WTWM's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by WTWM) will be profitable or equal any specific performance level(s). WTWM does not represent, warrant, or imply that the services or methods of analysis employed by WTWM can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Notwithstanding the method of analysis or investment strategy employed by WTWM, the assets within the client's portfolio are subject to risk of devaluation or loss. The client should be aware that there are many different events that can affect the value of the client's assets or portfolio including, but not limited to, changes in financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment

risks:

**Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

**Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.

**Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.

**Prepayment Risk:** The returns on the collateral for the deal can change dramatically at times if the debtors prepay the loans earlier than scheduled.

**Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

**Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

**Business Risk:** These risks are associated with a particular industry or a particular company within an industry.

**Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

While this information provides a synopsis of the events that may affect a client's investments, this listing is not exhaustive. Although WTWM's methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Clients should understand that there are inherent risks associated with investing and depending on the risk occurrence; clients may suffer LOSS OF ALL OR PART OF THE CLIENT'S PRINCIPAL INVESTMENT.

#### **D. RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES**

WTWM does not primarily recommend a particular type of security. Investments may include, but are not limited to, exchange listed securities, fixed-income securities, over-the-counter securities, foreign securities, options, derivatives, money market funds and other pooled investment vehicles, such as open and closed end mutual funds or ETF's.

## **ITEM 9 DISCIPLINARY INFORMATION**

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Registered investment advisers are required to disclose any legal or disciplinary events

that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Neither WTWM nor any of its management persons have been involved in legal or disciplinary events that are related to past or present investment clients.

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

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### **A. FINANCIAL INDUSTRY ACTIVITIES**

WTWM is not a registered broker-dealer and does not have an application pending to register as a broker-dealer. Furthermore, none of WTWM's management or supervised persons is a registered representative of, nor has an application pending to register as a representative of, a broker-dealer. However, WTWM does have the ability to service variable annuities, 529 plans and other broker-dealer products as an RIA.

### **B. FINANCIAL INDUSTRY AFFILIATIONS**

WTWM is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, WTWM's management and supervised persons are not registered as and do not have an application pending to register as an associated person of the foregoing entities.

### **C. OTHER MATERIAL RELATIONSHIPS**

WTWM does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships other than those already disclosed herein.

### **D. OTHER INVESTMENT ADVISERS**

WTWM has a fee sharing arrangement with True Financial Wealth Management Firm, LLC, an Arizona based investment advisory firm ("True Financial"). WTWM investment advisor representatives, Eileen Proud and Robert Redwanc, are both dually registered with WTWM and True Financial.

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

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### **A. DESCRIPTION OF CODE OF ETHICS**

All employees of WTWM must act in an ethical and professional manner. In view of the foregoing and applicable provisions of relevant law, WTWM has adopted a Code of Ethics in its Employee Policies and Procedures Manual to specify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures

relating to personal trading by WTWM personnel. WTWM's Code of Ethics in its Employee Policies and Procedures Manual, which specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. **We will provide a copy of our Code of Ethics to any client or prospective client upon request.**

#### **B. PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

WTWM does not recommend or effect transactions in securities in which any related person may have material financial interest.

#### **C. PROPRIETARY /SIMULTANEOUS TRADING**

At times, WTWM or its affiliated persons may buy or sell securities for our own accounts that we have also recommended to clients. However, any purchase or sale of a security by WTWM or a related person will be subject to WT's fiduciary duty to our client accounts. From time to time, representatives of WTWM may buy or sell securities for themselves at or around the same time as our client accounts. In any instance where similar securities are bought or sold, we will uphold our fiduciary duty by always transacting on behalf of our client before transacting for our own benefit. WTWM will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, we will monitor our proprietary and personal trading reports for adherence to our Code of Ethics.

### **ITEM 12 BROKERAGE PRACTICES**

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#### **A. SELECTION AND RECOMMENDATION**

WTWM seeks to recommend a custodian/broker who will hold client assets and execute transactions on terms that, overall, are most advantageous when compared to other available providers and their services.

WTWM considers a wide range of factors in selecting a custodian/broker including, among others, the following:

- ✓ Timeliness of execution
- ✓ Clearance and settlement capabilities
- ✓ Ability to place trades in difficult market environments
- ✓ Timeliness and accuracy of trade confirmations
- ✓ Quality of account statements
- ✓ Research, execution facilitation, record keeping, custody and other "value-added" services provided
- ✓ Frequency and correction of trading errors
- ✓ Financial condition and willingness to commit capital
- ✓ Business reputation and integrity

- ✓ WTWM's prior experience with the custodian/broker

To this end, WTWM has established a brokerage and custodian relationship with TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA ("TD AMERITRADE"). WTWM is independently owned and operated and is not affiliated with TD AMERITRADE. TD AMERITRADE will hold client assets in a brokerage account and buy and sell securities when WTWM or the client instructs them to.

WTWM has determined that having TD AMERITRADE execute trades is consistent with our duty to seek "best execution" of client trades.

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

WTWM does not currently receive "soft dollars."

Under "soft dollar" arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items. These soft dollar benefits are attributed to the investment advisor by reducing its expenses; however, the amount of the fee paid to the investment advisor by the client would not be reduced. Making allocations to brokerage businesses with soft dollar arrangements could enhance the ability to obtain research, optimal execution and other benefits on behalf of clients.

#### **C. BROKERAGE FOR CLIENT REFERRALS**

WTWM does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

#### **D. DIRECTED BROKERAGE**

WTWM will recommend to clients TD AMERITRADE Institutional, a Division of TD AMERITRADE, Inc., member FINRA/SIPC/NFA. This arrangement is designed to maximize efficiency and to be cost effective for our clients. By requiring clients to use our specific custodian, which WTWM has approved, we seek to achieve "best execution" of client transactions.

WTWM does not permit clients to direct the use a particular brokerage firm.

#### **E. ORDER AGGREGATION**

WTWM may, at times, aggregate sale and purchase orders of securities ("block trading") for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. WTWM may aggregate or "bunch" transactions for a client's account with those of other clients in an effort to obtain the best execution under the circumstances.

Trade Error Policy: WTWM maintains a record of any trading errors that occur in connection with investment activities of its clients. Both gains and losses that result from a trading error made by WTWM will be borne or realized by WTWM.



## **ITEM 13    REVIEW OF ACCOUNTS**

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### **A. PERIODIC REVIEWS**

WTWM reviews its client's account activity at least monthly. The reviews consist of determining whether a client's investment goals and objectives are aligned with WTWM's investment strategies. If reallocation of investments is necessary, WTWM sells underperforming investments or buys new investments that are more appropriate for the client's investment goals and objectives. The reviews are led by John K. Heilner, who is WTWM's Chief Investment Officer.

### **B. INTERMITTENT REVIEW FACTORS**

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in the client's financial status (such as retirement, termination of employment, relocation, or inheritance). Clients are advised to notify WTWM promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

### **C. REPORTS**

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered from the custodian.

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

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### **A. ECONOMIC BENEFITS FROM OTHERS**

WTWM does not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

### **B. COMPENSATION TO UNAFFILIATED THIRD PARTIES**

WTWM may, at times, enter into soliciting agreements to provide cash compensation to third parties for client referrals or introductions to WTWM. Our compensation agreements are in accordance with Rule 206(4)-3 under the Investment Adviser Act of 1940 and the applicable state regulations. To the extent required by Rule 206(4)-3 or applicable state regulations; the compensation is disclosed to clients by the third party referral source in a separate disclosure document. Generally, these arrangements provide compensation equal to a specific percentage of certain fees received by WTWM. This arrangement creates a conflict of interest in that cash compensation may impair the solicitor's evaluation of the client's suitability for WTWM's programs. To mitigate or remedy this conflict of interest the Chief Compliance Officer will review referrals to ensure suitability with WTWM's programs before compensating the solicitor. Prior to compensating any individual for referrals, WTWM will ensure that these individual solicitors are appropriately registered as investment adviser representatives, if registration is required by the jurisdictions in which solicitation activities are conducted.

Certain clients that engage WTWM's services as result of referrals from Introducing

Advisors may pay more or less to obtain WT's investment management services than do other clients, since a portion of the overall fee may be determined by the Introducing Advisor. In such situations, where the client pays more, the engagement shall result in an additional charge to the client in excess of what the client would have paid if the client were to engage the services of WTWM independent of the Introducing Advisor's introduction. Variations in the Introducing Advisor's compensation may be due to the Introducing Advisor's role as an unaffiliated investment adviser or investment adviser representative for the consulting and monitoring services the Introducing Advisor may provide to the client on an ongoing basis relative to the client's engagement of WT. Such arrangements, and their terms and conditions, are exclusively determined between the client and the Introducing Advisor, and WTWM will not be a party to these arrangements. Retail clients may pay more or less to obtain WT's investment management services than clients referred to WTWM by an Introducing Advisor.

## **ITEM 15 CUSTODY**

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### **A. CUSTODIAN OF ASSETS**

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

WTWM does not have direct custody of any client funds and/or securities. WTWM will not maintain physical possession of client funds and securities. Instead, client's funds and securities are held by the WTWM preferred qualified custodian.

While WTWM does not have physical custody of client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds client funds pursuant to the client's account application. In certain jurisdictions, the ability of WTWM to withdraw its management fees from the client's account may be deemed custody.

Prior to permitting direct debit of fees, each client provides written authorization permitting fees to be paid directly from the custodian.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of WTWM's advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact WTWM directly if they believe that there may be an error in their statement. Please refer to *Item 12* for information regarding WTWM's Brokerage Practices.

### **B. ACCOUNT STATEMENTS**

Although WTWM is the client's adviser, the client's statements will be mailed or made available electronically by the broker-dealer or custodian. When the client receives these statements, they should be reviewed carefully. Clients should compare asset values, holdings, and fees on the statement to that in the account statement issued the previous period.



## **ITEM 16 INVESTMENT DISCRETION**

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It is WTWM's customary procedure to have full discretionary authority in order to supervise and direct the investments of a client's accounts. Clients grant this authority upon execution of WTWM's IMA. This authority is for the purpose of making and implementing investment decisions, without the client's prior consultation. All investment decisions are made in accordance with the client's stated investment objectives. Other than management fees due to WTWM, which WTWM will receive directly from the custodian, WTWM's discretionary authority does not give authority to take or have possession of any assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to WTWM. Furthermore, WTWM's discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

## **ITEM 17 VOTING CLIENT SECURITIES**

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WTWM votes all proxies which are solicited for securities held in their accounts. WTWM will not be required to render any advice with respect to the voting of proxies solicited by or with respect to the issuers of securities in which assets of the client's account may be invested in occasionally. Furthermore, WTWM will not take any action or render any advice with respect to any securities held in any client's accounts that are named in or subject to class action lawsuits. WTWM will however, forward to the client any information received by WTWM regarding class action legal matters involving any security held in the client's account.

## **ITEM 18 FINANCIAL INFORMATION**

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### **A. BALANCE SHEET REQUIREMENT**

WTWM is not the qualified custodian for client funds or securities, and does not require prepayment of fees of more than \$500 per client, six (6) months or more in advance.

### **B. FINANCIAL CONDITION**

WTWM does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

### **C. BANKRUPTCY PETITION**

WTWM has not been the subject of a bankruptcy petition at any time during the last 10 years.

## **ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

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### **A. Firm Management**

The direct owner of WTWM is WesternTrust, L.P., a Delaware limited partnership. John

Heilner is the Chief Compliance Officer and Chief Investment Officer of WTWM and one of three investment advisor representatives.

**B. Other Business Activities**

Please see Item 10 of the Firm Brochure.

**C. Performance-Based Compensation**

WTWM does not assess a performance-based fee in the form of the Performance Allocation, as discussed in Item 5 above.

**D. Disciplinary Reporting Disclosure**

*Arbitration Claims*

Neither the Firm nor its management persons has been found liable in any arbitration claim alleging damages in excess of \$2,500 involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery counterfeiting or extortion or dishonest, unfair or unethical practices.

*Civil, Self-Regulatory Organization (SRO), or Administrative Proceeding*

Neither the Firm nor its management persons has been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment related business or activity, fraud, false statements or omissions, theft embezzlement or other wrongful taking of property bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

**E. Relationships or Arrangements with Securities Issuers**

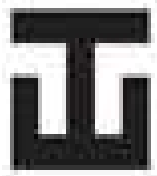
Neither the Firm nor its management has a relationship or arrangement with any issuer of securities.

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## **PRIVACY POLICY**

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WTWM does not disclose nonpublic personal information about its clients or former clients to any persons other than as described below. WTWM collects information about its clients (such as name, address, social security number, assets and income) from discussions with clients, from documents that clients may deliver to WTWM (such as account applications) and in the course of providing services. In order to service its client accounts and effect client transactions, WTWM may provide client personal information to its affiliates and to firms that assist it in servicing client accounts and which have a need for such information. WTWM does not otherwise provide information about its clients to outside firms, organizations or individuals except as required by law. Any party that receives this information will use it only for the services and as allowed by applicable law or regulations, and is not permitted to share or use this information for any other purpose.



WEALTHMANAGEMENT

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT  
MARCH 11, 2016**

**JOHN HEILNER**

**INVESTMENT ADVISOR REPRESENTATIVE**

Phone: (800) 825-0616

Email: [jheilner@wtwealthmanagement.com](mailto:jheilner@wtwealthmanagement.com)

This Brochure Supplement provides information about the qualifications of John Heilner, an Investment Adviser Representative of WT Wealth Management, LLC ("WTWM" or the "Firm"). Any questions about the contents of this brochure should be directed to the Firm.

Additional information about the Firm's Investment Adviser Representatives also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. John Heilner's CRD number is 2431461.



## A. GENERAL REQUIREMENTS

Generally, WTWM requires employees to have relevant work experience in the securities industry. Any employee of WTWM acting in a representative capacity will be appropriately licensed and registered as such.

## B. INVESTMENT ADVISER REPRESENTATIVE INFORMATION

We currently have three (3) investment adviser representatives employed by WTWM. This Brochure Supplement provides information about **John Heilner**.

## ITEM 2 EDUCATION AND BUSINESS EXPERIENCE

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CRD No. 2431461

Year of Birth: 1966

### Educational Background

**Central CT State University** (1989 - 1993) – received BS in Finance

### Business Experience

**Chief Investment Officer, Chief Compliance Officer** (Mar. 2013 - Present)

WT Wealth Management, LLC

**Portfolio Manager (registered)** (May 2012 – Apr. 2013)

Palo Verde Capital

**Economist (unregistered)** (Mar. 2011 – May 2012)

Palo Verde Capital

**President** (Feb. 2008 – Mar. 2011)

Renegade Classics

**Mutual Fund Strategist** (Jul. 2000 – Feb. 2008)

ING Mutual Funds

## ITEM 3 DISCIPLINARY INFORMATION

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None. John Heilner does not have any legal or disciplinary events material to a client's or prospective client's evaluation.

## **ITEM 4      OTHER BUSINESS ACTIVITIES**

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John Heilner in his individual capacity, is not engaged in any other business other than providing investment advice.

## **ITEM 5      ADDITIONAL COMPENSATION**

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John Heilner does not receive any economic benefit from any third party for providing advisory services.

## **ITEM 6      SUPERVISION**

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John Heilner is the Chief Investment Officer and an Investment Adviser Representative of WTWM. WTWM provides investment advisory services in accordance with its policies and procedures manual. John Heilner additionally serves as WTWM's Chief Compliance Officer and is primarily responsible for implementation of the Firm's policies and procedures. John Heilner may be contacted at (800) 825-0616 for more information about this Brochure Supplement.

## **ITEM 7      REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

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### **A. Arbitration Claims**

None. John Heilner has not been found liable in any arbitration claim alleging damages in excess of \$2,500 involving investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting or extortion; or dishonest, unfair or unethical practices.

### **B. Self-Regulatory Organization or Administrative Proceedings**

None. John Heilner has not been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

### **C. Bankruptcy Petitions**

None. John Heilner has not been the subject of a bankruptcy petition at any time during the last 10 years.



**FORM ADV PART 2B  
BROCHURE SUPPLEMENT  
MARCH 11, 2016**

**ROBERT F. REDWANC**

INVESTMENT ADVISOR REPRESENTATIVE

Phone: (800) 825-0616

Email: [redwanc@wtwealthmanagement.com](mailto:redwanc@wtwealthmanagement.com)

This Brochure Supplement provides information about the qualifications of Robert F. Redwanc, an Investment Adviser Representative of WT Wealth Management, LLC (“WTWM” or the “Firm”).

Additional information about the Firm’s Investment Adviser Representatives also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. Robert F. Redwanc’s CRD number is 4354455.

## A. GENERAL REQUIREMENTS

Generally, WTWM requires employees to have relevant work experience in the securities industry. Any employee of WTWM acting in a representative capacity will be appropriately licensed and registered as such.

## B. INVESTMENT ADVISER REPRESENTATIVE INFORMATION

We currently have three (3) investment adviser representatives employed by WTWM. This Brochure Supplement provides information about **Robert F. Redwanc**.

## ITEM 2 EDUCATION AND BUSINESS EXPERIENCE

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CRD No. 4354455

Year of Birth: 1956

### Educational Background

Academy of CFDS- currently a student

### Business Experience:

#### **Investment Advisor Representative**

WT Wealth Management, LLC

**Dec. 2015 – Present**

#### **Member, Owner, Vice President, Registered Investment Advisor (registered)**

True Financial Wealth Management Firm, LLC  
fka True Financial Advisory Firm, LLC

**Mar. 2013 – Present**

#### **Investment Advisor Representative**

Financial Advisors of America, LLC

**Jan. 2008 – Apr. 2013**

#### **Member, Owner, Vice President (unregistered)**

True Financial Wealth Management Firm, LLC  
fka True Financial Advisory Firm, LLC

**Oct. 2002 – Mar. 2013**

#### **Investment Advisor Representative**

Girard Securities, Inc.

**Mar. 2005 – Jan. 2008**

## ITEM 3 DISCIPLINARY INFORMATION

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None. Robert F. Redwanc does not have any legal or disciplinary events material to a client's or prospective client's evaluation.



## **ITEM 4      OTHER BUSINESS ACTIVITIES**

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Robert F. Redwanc is dually registered as an investment advisor representative with True Financial Wealth Management Firm, LLC.

## **ITEM 5      ADDITIONAL COMPENSATION**

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Robert F. Redwanc is dually registered as an investment advisor representative with True Financial Wealth Management Firm, LLC and receives compensation for advisory services rendered through that firm.

## **ITEM 6      SUPERVISION**

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Robert F. Redwanc is an Investment Adviser Representative of WTWM. WTWM provides investment advisory services in accordance with its policies and procedures manual. John Heilner serves as WTWM's Chief Compliance Officer and is primarily responsible for implementation of the Firm's policies and procedures. Robert Redwanc may be contacted at (800) 825-0616 for more information about this Brochure Supplement.

## **ITEM 7      REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

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### **A. Arbitration Claims**

None. Robert F. Redwanc has not been found liable in any arbitration claim alleging damages in excess of \$2,500 involving investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting or extortion; or dishonest, unfair or unethical practices.

### **B. Self-Regulatory Organization or Administrative Proceedings**

None. Robert F. Redwanc has not been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

### **C. Bankruptcy Petitions**

None. Robert F. Redwanc has not been the subject of a bankruptcy petition at any time during the last 10 years.



**FORM ADV PART 2B  
BROCHURE SUPPLEMENT  
MARCH 11, 2016**

**EILEEN M. PROUD**

**INVESTMENT ADVISOR REPRESENTATIVE**

Phone: (800) 825-0616

Email: [emproud@wtwealthmanagement.com](mailto:emproud@wtwealthmanagement.com)

This Brochure Supplement provides information about the qualifications of Eileen M. Proud, an Investment Adviser Representative of WT Wealth Management, LLC (“WTWM” or the “Firm”).

Additional information about the Firm’s Investment Adviser Representatives also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. Eileen M. Proud’s CRD number is 1019703.

## A. GENERAL REQUIREMENTS

Generally, WTWM requires employees to have relevant work experience in the securities industry. Any employee of WTWM acting in a representative capacity will be appropriately licensed and registered as such.

## B. INVESTMENT ADVISER REPRESENTATIVE INFORMATION

We currently have three (3) investment adviser representatives employed by WTWM. This Brochure Supplement provides information about **Eileen M. Proud**.

## ITEM 2 EDUCATION AND BUSINESS EXPERIENCE

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CRD No. 1019703

Year of Birth: 1954

### Educational Background

**Academy of CFDS** (2015) - earned CFDS (Certified Financial Divorce Specialist) designation

**Institute of Certified Divorce Financial Analysts** (2015) – earned CDFA (Certified Divorce Financial Analyst) designation

**College of Financial Planning** (1984 – 2004) - earned CFP designation

### Business Experience:

**Investment Advisor Representative**

WT Wealth Management, LLC

**Dec. 2015 – Present**

**Member, Owner, President**

True Financial Wealth Management Firm, LLC  
fka True Financial Advisory Firm, LLC

**May 2006 – Present**

**Registered Representative, Investment Advisor Representative**

Financial Advisors of America, LLC

**Jan. 2008 – Apr. 2013**

**Registered Representative, Investment Advisor Representative**

Girard Securities, Inc.

**Sept. 2002 – Jan. 2008**

## ITEM 3 DISCIPLINARY INFORMATION

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Eileen M. Proud was named in an arbitration proceeding in July of 2005 while employed with Sentra Securities Corp. The claimant alleged that Eileen M. Proud recommended unsuitable securities and investment strategies. The claimant also claimed breach of contract, mutual

fund switching and negligence. Without confirming or denying the allegations the case was ultimately settled in December 2006 for \$25,000.

#### **ITEM 4      OTHER BUSINESS ACTIVITIES**

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Eileen M. Proud is dually registered as an investment advisor representative with True Financial Wealth Management Firm, LLC.

#### **ITEM 5      ADDITIONAL COMPENSATION**

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Eileen M. Proud is dually registered as an investment advisor representative with True Financial Wealth Management Firm, LLC and receives compensation for advisory services rendered through that firm.

#### **ITEM 6      SUPERVISION**

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Eileen M. Proud is an Investment Adviser Representative of WTWM. WTWM provides investment advisory services in accordance with its policies and procedures manual. John Heilner serves as WTWM's Chief Compliance Officer and is primarily responsible for implementation of the Firm's policies and procedures. Eileen M. Proud may be contacted at (800) 825-0616 for more information about this Brochure Supplement.

#### **ITEM 7      REQUIREMENTS FOR STATE-REGISTERED ADVISERS**

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##### **A. Arbitration Claims**

Eileen M. Proud was named in an arbitration proceeding in July of 2005 while employed with Sentra Securities Corp. The claimant alleged that Eileen M. Proud recommended unsuitable securities and investment strategies. The claimant also claimed breach of contract, mutual fund switching and negligence. Without confirming or denying the allegations the case was ultimately settled in December 2006 for \$25,000.

##### **B. Self-Regulatory Organization or Administrative Proceedings**

None. Eileen M. Proud has not been found liable in any civil, self-regulatory organization, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statements or omissions, theft, embezzlement or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion; or dishonest, unfair or unethical practices.

##### **C. Bankruptcy Petitions**

None. Eileen M. Proud has not been the subject of a bankruptcy petition at any time during the last 10 years.

