

# Wolfson Wealth Management, LLC Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Wolfson Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (315) 449-4730 or by email at: [rsj@wwmanllc.com](mailto:rsj@wwmanllc.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Wolfson Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Wolfson Wealth Management, LLC's CRD number is: 282661.*

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

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## **Item 2: Material Changes**

Wolfson Wealth Management, LLC has the following material changes to report. This list summarizes changes to policies, practices or conflicts of interests only.

- The firm has updated the Assets Under Management within the 120 days to meet the basis for SEC registration.

### Item 3: Table of Contents

Item 1: Cover Page

|  |    |
|--|----|
| Item 2: Material Changes.....  | i  |
| Item 3: Table of Contents.....   | ii |
| Item 4: Advisory Business .....  | 2  |
| A. Description of the Advisory Firm .....  | 2  |
| B. Types of Advisory Services .....  | 2  |
| C. Client Tailored Services and Client Imposed Restrictions.....                     | 3  |
| D. Wrap Fee Programs.....  | 3  |
| E. Assets Under Management.....  | 4  |
| Item 5: Fees and Compensation.....   | 4  |
| A. Fee Schedule.....   | 4  |
| B. Payment of Fees.....  | 5  |
| C. Client Responsibility For Third Party Fees .....                                  | 6  |
| D. Prepayment of Fees .....  | 6  |
| E. Outside Compensation For the Sale of Securities to Clients.....                   | 6  |
| 1. This is a Conflict of Interest .....  | 6  |
| 2. Clients Have the Option to Purchase Recommended Products From Other Brokers ..... | 6  |
| 3. Commissions are not the Primary Source of Income for WWMLLC.....                  | 7  |
| 4. Advisory Fees in Addition to Commissions or Markups.....                          | 7  |
| Item 6: Performance-Based Fees and Side-By-Side Management .....                     | 7  |
| Item 7: Types of Clients .....   | 7  |
| Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss.....            | 7  |
| A. Methods of Analysis and Investment Strategies .....                               | 7  |
| B. Material Risks Involved .....   | 8  |
| C. Risks of Specific Securities Utilized.....  | 9  |
| Item 9: Disciplinary Information .....   | 11 |
| A. Criminal or Civil Actions .....   | 11 |
| B. Administrative Proceedings .....  | 11 |
| C. Self-regulatory Organization (SRO) Proceedings.....                               | 11 |

|   |    |
|---|----|
| Item 10: Other Financial Industry Activities and Affiliations .....   | 12 |
| A. Registration as a Broker/Dealer or Broker/Dealer Representative .....  | 12 |
| B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor .....             | 12 |
| C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests .....                  | 12 |
| D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections .....                   | 12 |
| Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....                        | 13 |
| A. Code of Ethics .....   | 13 |
| B. Recommendations Involving Material Financial Interests .....   | 13 |
| C. Investing Personal Money in the Same Securities as Clients .....   | 13 |
| D. Trading Securities At/ Around the Same Time as Clients' Securities .....   | 13 |
| Item 12: Brokerage Practices .....  | 14 |
| A. Factors Used to Select Custodians and/or Broker/Dealers .....  | 14 |
| 1. Research and Other Soft Dollar Benefits .....  | 14 |
| 2. Brokerage for Client Referrals .....   | 14 |
| 3. Clients Directing Which Broker/Dealer/Custodian to Use .....   | 14 |
| B. Aggregating (Block) Trading for Multiple Client Accounts .....   | 15 |
| Item 13: Review of Accounts .....   | 15 |
| A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews .....   | 15 |
| B. Factors That Will Trigger a Non-Periodic Review of Client Accounts .....   | 15 |
| C. Content and Frequency of Regular Reports Provided to Clients .....   | 16 |
| Item 14: Client Referrals and Other Compensation .....  | 16 |
| A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) ..... | 16 |
| B. Compensation to Non – Advisory Personnel for Client Referrals .....  | 16 |
| Item 15: Custody .....  | 16 |
| Item 16: Investment Discretion .....  | 16 |
| Item 17: Voting Client Securities (Proxy Voting) .....  | 17 |
| Item 18: Financial Information .....  | 17 |
| A. Balance Sheet .....  | 17 |

|    |  |    |
|----|--|----|
| B. | Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients..... | 17 |
| C. | Bankruptcy Petitions in Previous Ten Years .....   | 17 |

## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Wolfson Wealth Management, LLC (hereinafter “WWMLLC”) is a Limited Liability Company organized in the State of New York.

The firm was formed in December 2015, and the principal owner is Ann Isserlis Wolfson.

### **B. Types of Advisory Services**

#### ***Portfolio Management Services***

WWMLLC offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WWMLLC creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

WWMLLC evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. WWMLLC will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

WWMLLC seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of WWMLLC’s economic, investment or other financial interests. To meet its fiduciary obligations, WWMLLC attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, WWMLLC’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is WWMLLC’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

### ***Pension Consulting Services***

WWMLLC offers ongoing consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans) based on the demographics, goals, objectives, time horizon, and/or risk tolerance of the plan's participants.

### ***Financial Planning***

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

### **Services Limited to Specific Types of Investments**

WWMLLC generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities and venture capital funds, although WWMLLC primarily recommends mutual funds to a majority of its clients. WWMLLC may use other securities as well to help diversify a portfolio when applicable.

## **C. Client Tailored Services and Client Imposed Restrictions**

WWMLLC will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by WWMLLC on behalf of the client. WWMLLC may use "model portfolios" together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent WWMLLC from properly servicing the client account, or if the restrictions would require WWMLLC to deviate from its standard suite of services, WWMLLC reserves the right to end the relationship.

## **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. WWMLLC does not participate in any wrap fee programs.

## **E. Assets Under Management**

WWMLLC has the following assets under management:

| <b>Discretionary Amounts:</b> | <b>Non-discretionary Amounts:</b> | <b>Date Calculated:</b> |
|-------------------------------|-----------------------------------|-------------------------|
| \$40,351,000.00               | \$0.00                            | December 2016           |

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### ***Asset-Based Fees for Portfolio Management***

| <b>Total Assets Under Management</b> | <b>Annual Fee</b> |
|--------------------------------------|-------------------|
| First \$1,500,000                    | 1.00%             |
| Next \$2,500,000                     | 0.75%             |
| Above \$4,000,000                    | 0.50%             |

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of WWMLLC's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

WWMLLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

#### ***Pension Consulting Services Fees***

#### ***Asset-Based Fees for Pension Consulting***

| <b>Total Assets Under Management</b> | <b>Annual Fee</b> |
|--------------------------------------|-------------------|
| First \$1,500,000                    | 0.60%             |
| Next \$2,500,000                     | 0.35%             |
| Above \$4,000,000                    | 0.20%             |

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.



Clients may terminate the agreement without penalty for a full refund of WWMLLC's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice. WWMLLC bills based on the balance on the first day of the billing period

WWMLLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

### ***Financial Planning Fees***

Clients may terminate the agreement without penalty for a full refund of WWMLLC's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

### ***Fixed Fees***

The negotiated fixed rate for creating client financial plans is between \$100 and \$2,500. Fees are charged in arrears upon completion.

### ***Hourly Fees***

The negotiated hourly fee for these services is between \$100 and \$250. Fees are charged in arrears upon completion.

## **B. Payment of Fees**

### ***Payment of Asset-Based Portfolio Management Fees***

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

### ***Payment of Asset-Based Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in advance.

### ***Payment of Financial Planning Fees***

Financial planning fees are paid via check.

Fixed financial planning fees are paid in arrears upon completion.

Hourly financial planning fees are paid in arrears upon completion.

### **C. Client Responsibility For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by WWMLLC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

### **D. Prepayment of Fees**

WWMLLC collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

### **E. Outside Compensation For the Sale of Securities to Clients**

Ann Isserlis Wolfson in her role as a registered representative at Cadaret, does not accept compensation for the sale of securities to WWMLLC clients.

#### ***1. This is a Conflict of Interest***

The supervised persons will accept compensation for the sale of securities or other investment products, including asset based sales charges or service fees from the sale of mutual funds to its clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, they will document the conflict of interest in the client file and inform the client of the conflict of interest.

#### ***2. Clients Have the Option to Purchase Recommended Products From Other Brokers***

Clients always have the option to purchase WWMLLC recommended products through other brokers or agents that are not affiliated with WWMLLC.

### ***3. Commissions are not the Primary Source of Income for WWMLLC***

Commissions are not WWMLLC's primary source of compensation for advisory services.

### ***4. Advisory Fees in Addition to Commissions or Markups***

Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

WWMLLC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

## **Item 7: Types of Clients**

WWMLLC generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans
- ❖ Charitable Organizations

### ***Minimum Account Size***

There is no account minimum for any of WWMLLC's services.

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

### **A. Methods of Analysis and Investment Strategies**

#### ***Methods of Analysis***

WWMLLC's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

**Charting analysis** involves the use of patterns in performance charts. WWMLLC uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

**Cyclical analysis** involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

**Quantitative analysis** deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

**Modern portfolio theory** is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

### ***Investment Strategies***

WWMLLC uses long term trading and margin transactions.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **B. Material Risks Involved**

### ***Methods of Analysis***

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. 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** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

**Cyclical analysis** assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with 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, then it changes the very cycles these investors are trying to exploit.

**Quantitative Model Risk:** Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

**Modern Portfolio Theory** assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

### ***Investment Strategies***

WWMLLC's use of margin transactions generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various 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, market risk, and political/regulatory risk.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

WWMLLC's use of margin transactions generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation

Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Real Estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and

fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Venture capital funds** invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

**Commodities** are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

**Non-U.S. securities** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

**Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Ann Isserlis Wolfson in her role as a registered representative at Cadaret, Grant.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither WWMLLC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Ann Isserlis Wolfson is a registered representative. From time to time, she will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Wolfson Wealth Management, LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Wolfson Wealth Management, LLC in such individual's outside capacity.

### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

WWMLLC may direct clients to third-party investment advisers. Clients will pay WWMLLC a discounted fee for the advisers to which it directs those clients. The fees will not exceed any limit imposed by any regulatory agency. WWMLLC will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. WWMLLC will ensure that all recommended advisers are licensed or notice filed in the states in which WWMLLC is recommending them to clients.



## **Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **A. Code of Ethics**

WWMLLC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. WWMLLC's Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

If an agency cross transaction arises, WWMLLC will only execute such transaction with the consent of the applicable client. An agency cross transaction is generally defined as a transaction where a person acts as investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of WWMLLC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of WWMLLC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. WWMLLC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of WWMLLC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WWMLLC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, WWMLLC will never engage in trading that operates to the client's disadvantage if representatives of WWMLLC buy or sell securities at or around the same time as clients.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

Custodians/broker-dealers will be recommended based on WWMLLC's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and WWMLLC may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in WWMLLC's research efforts. WWMLLC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

WWMLLC recommends Schwab Institutional, a division of Charles Schwab & Co., Inc.

#### ***1. Research and Other Soft Dollar Benefits***

While WWMLLC has no formal soft dollars program in which soft dollars are used to pay for third party services, WWMLLC may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). WWMLLC may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and WWMLLC does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. WWMLLC benefits by not having to produce or pay for the research, products or services, and WWMLLC will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that WWMLLC's acceptance of soft dollar benefits may result in higher commissions charged to the client.

#### ***2. Brokerage for Client Referrals***

WWMLLC 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***

WWMLLC may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers

supersedes any authority granted to WWMLLC to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; the client may be unable to participate in block trades (unless WWMLLC is able to engage in “step outs”); and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

### **B. Aggregating (Block) Trading for Multiple Client Accounts**

If WWMLLC buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, WWMLLC would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. WWMLLC would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

## **Item 13: Review of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

All client accounts for WWMLLC's advisory services provided on an ongoing basis are reviewed at least monthly by Robert S Just, Investment Adviser/CCO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at WWMLLC are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Robert S Just, Investment Adviser/CCO. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, WWMLLC's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of WWMLLC's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. WWMLLC will also provide at least quarterly a separate written statement to the client.

Each financial planning client will receive the financial plan upon completion.

## **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)**

WWMLLC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to WWMLLC's clients.

### **B. Compensation to Non – Advisory Personnel for Client Referrals**

WWMLLC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, WWMLLC will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

## **Item 16: Investment Discretion**

WWMLLC provides discretionary and non-discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, WWMLLC generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, WWMLLC's discretionary authority in making these determinations may be limited by

conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to WWMLLC).

### **Item 17: Voting Client Securities (Proxy Voting)**

WWMLLC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

WWMLLC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

#### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither WWMLLC nor its management has any financial condition that is likely to reasonably impair WWMLLC's ability to meet contractual commitments to clients.

#### **C. Bankruptcy Petitions in Previous Ten Years**

WWMLLC has not been the subject of a bankruptcy petition in the last ten years.