



**WALNUT CREEK  
WEALTH MANAGEMENT**

Attentive • Independent • Advice

## **A Registered Investment Advisor**

### **Firm Brochure**

### **Form ADV Part 2A**

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**March 12, 2018**

This brochure provides information about the qualifications and business practices of Walnut Creek Wealth Management, a registered investment advisor. If you have any questions about the contents of this brochure, please contact us at 925-280-1800. 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 Walnut Creek Wealth Management is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site by our identifying number known as a CRD number. The CRD number for Walnut Creek Wealth Management is 288440.

Registration with the SEC or any state securities authority does not imply a certain level of skill or training. You are encouraged to review this brochure and brochure supplements for our firm's associates for more information on the qualification of our firm and its employees.

### **ADV Item 2: Material Changes**

There have been no material changes in the Walnut Creek Wealth Management brochure since it was last updated on May 1, 2017. Please contact the Walnut Creek Wealth Management office at 925-280-1800 with any questions.

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### **Advisory Services**

JBC Financial Group, Inc. doing business as Walnut Creek Wealth Management (“WCWM”) is registered as an investment advisor with the United States Securities and Exchange Commission. WCWM is organized as a corporation under the laws of the state of California and has been in business since 2017. The owners of the company are Bernard Smit, President, Damien Couture, Vice President and Chief Compliance Officer (CCO) and Deborah Pursey, Vice President.

Advisory services include a financial planning component. Portfolios of mutual funds, stocks and exchange traded funds (ETF) are constructed based on client objectives. Market timing is limited to actions from mega trend changes. For example, timing due to interest rate changes; economic changes from sector events or political events. Client portfolios are tailored to client objectives. A client’s input in the portfolio creation is of major importance. A client’s risk tolerance, investment time horizon and level of investment knowledge are considered in portfolio creation. Clients may impose restrictions on investment choices.

### **Portfolio Management Services**

We offer discretionary and non-discretionary portfolio management services. Our investment advice is designed to meet our clients’ needs and investment objectives. If you retain our firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we will design an investment portfolio for you according to your risk tolerance and investing objectives. Once we construct an investment portfolio for you we will monitor your portfolio’s performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization form. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

### **Pension Consulting Services**

We offer pension consulting services to employee benefit plans (the “Plan”) and their fiduciaries based upon the needs of the Plan and the services requested by the plan sponsor or named fiduciary. In general, these services may include an existing Plan review and analysis, plan-level advice regarding fund selection and investment options, education services to plan participants, investment performance monitoring, and/or ongoing consulting. These pension consulting services will be non-discretionary and advisory in nature. The ultimate decision to act on behalf of the Plan shall remain with the plan sponsor or other named fiduciary.

The services are designed to assist plan sponsors in meeting their management and fiduciary obligations to Participants under the Employee Retirement Income Securities Act (“ERISA”). Pursuant to adopted regulations of the U.S. Department of Labor, we are required to provide the Plan’s responsible plan fiduciary (the person who has the authority to engage us as an investment adviser to the Plan) with a written statement of the services we provide to the Plan, the compensation we receive for providing those services, and our status (which is described below).

The services we provide to your Plan are described above, and in the service agreement you sign with our firm. Our compensation for these services is described below, at Item 5, and also in the service agreement. We may, with consent of the Plan, and in accordance with Plan documents, bill out-of-pocket expenses (such as overnight mailings, messenger, translation fees, etc.) at cost. We do not reasonably expect to receive any other compensation, direct or indirect, for the services we provide to the Plan. If we receive any other compensation for such services, we will (i) offset the compensation against our stated fees, and (ii) we will promptly disclose the amount of such compensation, the services rendered for such compensation and the payer of such compensation to you.

In providing services to the Plan, our status is that of an investment adviser registered with the SEC and other securities authorities as required by law, and we are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting as a non-discretionary fiduciary of the Plan as defined in Section 3(21) under ERISA.

Client is responsible for informing WCWM of any material changes in their financial situation. The client agrees to review all documents sent by WCWM and agrees to notify our office of issues found on the client reports, documents and/or statements in a timely manner.

**Wrap Fee Program(s)**

WCWM does not participate in a wrap fee program.

**Assets Under Management**

As of December 31, 2017 we manage \$123,800,000.00 in client assets on a discretionary basis and \$4,500,000.00 in client assets on a non-discretionary basis.

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### **Fees and Compensation**

The fees for managing assets will be based on a percentage of total assets under management. Annual fees are 1.50% for \$0 to \$ 250,000, 1.40% for \$ 250,001 to \$ 500,000, 1.25% for \$ 500,001 to \$ 1,000,000, 1.00% for \$ 1,000,001 to \$ 2,000,000 and .75% for \$ 2,000,001 and greater. Fees can be negotiated with WCWM. Fees can be lower than stated under particular circumstances. For example, if a client has indicated they will add to their portfolio during a 12 month period bringing their account value to the next tiered fee level, then that lower level will be applied immediately. If family members have different accounts with WCWM, the total of all related accounts will be used for fee determination. If a larger account with WCWM carries a lower fee and the accounts needs to be subdivided into smaller unrelated accounts, those new accounts may carry the original lower fee structure.

The fee shall be deducted from the client's investment accounts on a quarterly basis, based on the fee schedule and begin once the account balance has reached \$ 5,000 unless otherwise instructed by the client. Our clients can also choose to be invoiced for this quarterly fee and not have it automatically deducted from their account. They may send a check directly to the custodial broker dealer for the quarterly fee but this option does need to be set up in advance.

The first payment is prorated to cover the period from the date that the account balance has reached \$ 5,000 through the end of the current calendar quarter. The quarterly fee will be paid at the beginning of each calendar quarter for such quarter and the fee will be based on the fair market value of the assets in the account on the last business day of the proceeding calendar quarter as calculated by the custodial broker dealer. Client will also be subject to a fee for any additional lump sum contribution(s) in a calendar quarter equal to or greater than \$ 5,000. Client will pay for that portion of the ongoing quarterly fee that relates to the number of days remaining in the calendar quarter on the date of any additional contribution equal to or greater than \$ 5,000. Payment of the fee will be made in the quarter following any such contribution and will be based on the amount of the contribution. Similarly, if Client withdraws \$ 5,000 or greater, then the Client will receive a pro-rated refund in the following quarter.

### **Additional Fees and Expenses**

WCWM has an hourly advisory fee of \$ 150.00. For clients not requiring a managed asset fee structure, WCWM will provide an estimate in writing for the cost of the advisory work.

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the *Brokerage Practices* section of this brochure.

### **Compensation for the Sale of Securities or Other Investment Products**

The owners of WCWM are registered representatives with Cetera Advisor Networks LLC, a securities broker-dealer. In their capacity as registered representatives, they may receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by in t heir capacity as a registered representatives is separate and in addition to our advisory fees. This practice may present a conflict of interest because the WCWM owners may have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase securities products through any person affiliated with our firm. WCWM owners may also earn commission from insurance products and those fees are variable.

### **Pension Consulting Services**

Because Pension consulting services can encompass such a wide variety of services (as detailed more fully in Item 4), our advisory fees for these customized services will be negotiated with the plan sponsor or named fiduciary on a case-by-case basis. Our fees are typically 1.00% of the assets in the Plan and paid quarterly in advance.

The fee shall be deducted from the client's investment accounts on a quarterly basis, based on the fee schedule and begin once the account balance has reached \$ 5,000 unless otherwise instructed by the client. Our clients can also choose to be invoiced for this quarterly fee and not have it automatically deducted from their account. They may send a check directly to the custodial broker dealer for the quarterly fee but this option does need to be set up in advance.

Either party to the pension consulting agreement may terminate the agreement upon 30-days' written notice to the other party. The pension consulting fees will be prorated for the quarter in which the termination notice is given and any unearned fees will be refunded to the client.

### **IRA Rollover Considerations**

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm. Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometime move assets out of the company plan before they retire or change jobs. In determining whether to complete the rollover of an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
  - a. Employer retirement plans generally have a more limited investment menu than IRAs.
  - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
  - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
  - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 70.5.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
  - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Form ADV Part 2A, Item 6

#### **Performance Based Fees and Side by Side Management:**

WCWM does not charge performance based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Form ADV Part 2A, Item 7

#### **Types of Clients:**

WCWM clients generally are individuals, 401-K plans, trusts, corporate pension plans, self-employed pension plans and other tax deferred accounts. Account minimum is \$ 100,000.00. At our discretion, we may waive or lower this minimum account size.



Form ADV Part 2A, Item 8

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

### Our Methods of Analysis and Investment Strategies

Investment advice and strategies can vary depending on client objectives. Client investment histories and experience must be assessed before an advisor can adopt a particular investment program. Fortunately the analysis of a particular investment or series of investments have generally been performed by a competent outside service such as Morningstar Reports.

We have found it useful to choose funds that provide the best overall value in each of the nine Morningstar style boxes. Both equity and fixed income categories are used. Once a client's objectives are established and their investment histories, risk tolerance and time horizons are understood, appropriate mutual funds and exchange traded funds can be suggested.

In managing assets, numerous factors must be considered. In addition to all of the above, daily world events both political and economic must be evaluated. We subscribe to a broad array of investment advisory periodicals and investment reports. In addition to Morningstar Reports, Valueline, Wall Street Journal, Investors Daily and Barrons, we also read and review numerous private investment letters.

The investment strategy we employ is a function of all the above. We evaluate world and local markets weekly and adjust client portfolios according to our interpretation and understanding of relevant data gathered from the above sources. Online news sources also play a significant role.

We do some charting and fundamental analysis on the mutual funds and exchange traded funds that we use. We pay attention to a particular funds Alpha and Beta, standard deviation, R-squared and Sharpe ratio. The following is a description of charting and fundamental analysis:

**Charting Analysis** – involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

**Risk:** Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis** – involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

**Risk:** The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

### Risk of Loss

Our overall investment strategy is to evaluate trends and invest appropriately in conjunction with the client's needs. Risk is constantly evaluated and the client is updated. The client fully understands investments have different levels of risk. No investment plan we offer is without risk.

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### **Recommendation of Particular Types of Securities**

We primarily recommend equities and fixed income securities (i.e., bonds); however, we may recommend other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

**Stocks:** There are numerous ways of measuring the risk of equity securities (also known simply as “equities” or “stock”). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to: the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, more well established companies (“large cap”) tend to be safer than smaller start-up companies (“small cap”) but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

**Bonds:** Corporate debt securities (or “bonds”) are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be “called” prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Form ADV Part 2A, Item 9

### **Disciplinary Information**

We are required to disclose whether there are 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. If our firm or owners have been involved in one of these events, we must disclose that information in our ADV 2A brochure for ten years following the date of the event, unless (1) the event was resolved in our or the owners favor, or was reversed, suspended or vacated, or (2) the event is not material.

WCWM and its owners have not been involved in any legal or disciplinary events in the past ten years that would be material to a client’s evaluation of the company or its personnel.

Form ADV Part 2A, Item 10

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

**Registrations with Broker-Dealers:** WCWM owners are registered representatives with Cetera Advisor Networks LLC, a securities broker dealer.

**Licensed Insurance Agents:** WCWM owners providing investment advice on behalf of the firm are also licensed insurance agents. They will earn Commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions are separate from the advisory fee. Please see the Fees and Compensation section in this brochure for more information.

Form ADV Part 2A, Item 11

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

**A. Brief description of our Code of Ethics and offer to provide a copy of our Code of Ethics to any client or prospective client upon request.**

We have established a Code of Ethics which applies to all of our owners. An investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our owners to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all owners will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and owners must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

**B. If our firm or an owner recommends to clients, or buys or sells for client accounts, securities in which our firm or an owner has a material financial interest (excluding an interest as a shareholder of an SEC-registered, open-end investment company), we must describe our practice and discuss the conflicts of interest it presents.**

Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which we or an owner has a material financial interest.

**C. If our firm or an owner invests in the same securities (or related securities, e.g., warrants, options or futures) that our firm or an owner recommends to clients, we are required to describe our practice and discuss the conflicts of interest this presents and generally how we address the conflicts that arise in connection with personal trading.**

Owners may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, owners will place client interests ahead of our own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

**D. If our firm or an owner recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or an owner buys or sells the same securities for our firm's (or the related person's own) account, we are required to describe our practice and discuss the conflicts of interest it presents. We are also required to describe generally how we address conflicts that arise.**

Owners may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

Form ADV Part 2A, Item 12

### **Brokerage Practices**

As registered representatives of Cetera Advisor Networks LLC, WCWM owners will recommend Cetera to you for brokerage services. WCWM owners are subject to applicable rules that restrict them from conducting securities transactions away from Cetera Advisor Networks LLC unless Cetera Advisor Networks provides them with written authorization to do so. Therefore, they are generally limited to conducting securities transactions through Cetera Advisor Networks LLC. It may be the case that Cetera charges higher transactions costs and/or custodial fees than another broker charges for the same types of services. If transactions are executed through Cetera Advisor Networks, WCWM owner (in their separate capacity as a registered representatives of Cetera Advisor Networks) may earn commission-based compensation as result of placing the recommended securities transactions through Cetera Advisor Networks. This practice presents a conflict of interest because WCWM have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. You may utilize the broker-dealer of your choice and have no obligation to purchase or sell securities through WCWM owners. However, if you do not use Cetera Advisor Networks LLC, we may not be able to accept your account.

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

#### **Block Trades**

We do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

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

WCWM owners do not receive research or soft dollar benefits from any broker-dealer. WCWM pays for all research products that they use. They do not use broker-dealer based research. They buy their research directly from third party vendors such as Forbes, Barron's, Valueline and Morningstar.

Form ADV Part 2A, Item 13

### **Review of Accounts**

WCWM owners will review client accounts or financial plans at least once a year. If a client indicates a material change in their financial position, appropriate adjustments will be effected in their account. Assets are reviewed based on a client's objectives and needs.

Typical factors would include a change in a client's objectives. Changes in national or world events. Changes in mutual fund managers or events deemed negative with a fund family or exchange traded fund. Economic sector changes would also prompt a review. Generally, any material change in assets or client's needs would trigger a review.

Clients receive a monthly account summary and quarterly performance reports sent directly from the custodial broker dealer.

Form ADV Part 2A, Item 14

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

#### **Compensation for Client Referrals**

WCWM does not compensate anyone for referrals.

Form ADV Part 2A, Item 15

### **Custody**

WCWM does not have custody of client assets. All assets for the Advisory are held by the custodial broker dealer. The custodial broker dealer provides all transactional documentation, monthly statements and quarterly performance reports directly to clients at their addresses of record.

Form ADV Part 2A, Item 16

### **Investment Discretion**

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, and the appropriate trading authorization form.

You must grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s). You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. The advisory agreement and limited power of attorney do not authorize WCWM or its Investment Advisory Representatives to move client monies to or from their accounts. Please refer to the Advisory Business section in this brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transaction for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Form ADV Part 2A, Item 17

### **Voting Client Securities**

Clients will receive proxy information from their custodial broker-dealer(s). WCWM requests that clients engage another party to determine how proxies should be voted. WCWM does not provide proxy voting services to its clients. Clients may contact their WCWM Investment Advisory Representatives (IAR) by telephone or email if they have questions.

Form ADV Part 2A, Item 18

### **Financial Information**

As an investment advisory firm that maintains discretionary authority, we are required to disclose any financial condition that would be likely to impair our ability to meet our contractual and fiduciary obligations to our clients. WCWM has no such financial conditions to report. WCWM is not and has not been the subject of a bankruptcy proceeding.

When conducting financial planning services, WCWM may require a portion of a financial planning fee in

advance but will not require or solicit prepayment of fees in excess of \$1,200.00 and six months or more in advance. Additionally, we do not take custody of client funds or securities. Therefore we are not required to file financial information with the SEC or with the states where WCWM is notice filed.

### **WCWM Privacy Policy**

We recognize our obligation to keep information about you secure and confidential. It's important for you to know that we do not sell your information to anyone. We restrict access to non-public personal information about you to those IARs and employees who need to know that information to provide products or services to you. We also maintain physical, electronic, and procedural safeguards to guard your non-public personal information.

### **WCWM Business Continuity Plan**

In accordance with federal requirements WCWM maintains a Business Continuity Plan that describes what steps will be taken to ensure the continuity of our business operation in the event of an unanticipated disaster. The plan has been designed with procedures to ensure that client documentation will be accessible and that contact between WCWM and its clients will be sustained. If you would like to receive a copy of the WCWM Business Continuity Plan please contact our office.