

Wolfrum and Company

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Form ADV Part 2A (“Brochure”) and 2B as of December 1, 2017

This Brochure provides information about the qualifications and business practices of **Wolfrum and Company (“Wolfrum”)**. If you have any questions about the contents of this Brochure, please contact us at sem19@att.net. The information in the 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 Wolfrum will be available on the SEC’s website www.adviserinfo.sec.gov (click on the link, select “Investment Adviser” search, select “Firm” and type in our firm name).

Our firm is a Registered Investment Adviser. We are required to inform you that registration itself does not imply a certain level of skill or training.

<u>Table of Contents</u>	<u>Page</u>
Material Disclosures	3
Privacy Notice	2
Advisory Business	3
Fees and Compensation	5
Performance-Based Fees and Side-by-Side Management	6
Types of Clients	6
Methods of Analysis, Investment Strategies and Risk of Loss	6
Other Financial Industry Activities and Affiliations	7
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	7
Brokerage Practices	7
Review of Accounts	8
Client Referrals and Other Compensation	8
Custody	9
Investment Discretion	9
Voting Client Securities	9
Financial Information	9
Scott Wolfrum Brochure Supplement 2B	10

Material Disclosures

Wolfrum is a newly formed registered investment advisor with its principal location in Indianapolis, Indiana.

Its founder, Scott Wolfrum (“Scott”), brings close to 25 years of experience in the financial services industry, most recently as owner and operator of Wolfrum Capital Management Group, holding its licenses through David A. Noyes & Company. For more information on Scott, refer to Form ADV Part 2B, which is attached to this Brochure.

None of the principals/key employees of Wolfrum, Inc. have ever been subject to any legal or disciplinary actions or controversies.

This Brochure will be updated and resubmitted to the regulatory agencies within 120 days of the date of this document.

Wolfrum’s Privacy Policy

Wolfrum does not sell consumer information to anyone. Confidential and non-public information is collected to provide financial advice and services, to complete transactions or to make clients aware of other services available through Wolfrum. Clients of Wolfrum receive a copy of our Privacy Notice at the inception of the new advisory relationship and on an annual basis thereafter. A copy is available upon request at no charge.

Advisory Business

Wolfrum, a limited liability company, formed in Indiana in 2017 by Scott Wolfrum, who is the president and controlling shareholder.

Wolfrum provides personalized investment advice, including alternative investments and private placements, asset allocation and selection, personalized investment policy statements, risk tolerance analysis, investment implementation services and insurance advice. These services are provided primarily to high net worth individuals.

Our investment advisory services are delivered primarily through providing advice and consultation in the selection of appropriate portfolio strategies and the selection of portfolio managers to achieve the goals established by our clients. To arrive at an appropriate portfolio strategy we will assist client in determining financial goals, risk tolerance, tax considerations, and developing an overall investment policy and philosophy to achieve those goals. In addition, we analyze, prepare and furnish clients with reports regarding performance of their portfolios. Wolfrum will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. We are occasionally asked to monitor securities which clients own but have no desire or intention to sell, but those securities must be considered in determining an appropriate overall financial plan.

The investment vehicles primarily consist of mutual funds of exchange listed securities, but may also include: securities traded over the counter, foreign issuer securities, private placements, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, US government securities, option contracts on securities, investment company securities including variable life insurance and variable annuities. In addition, we may select other investment vehicles not mentioned above if we believe those investments will meet the investment objectives of our clients, including real estate, oil and gas interests, partnerships, valuable collectibles, art, antiques, coins, minerals, privately owned businesses, hedge funds or other alternative investments.

In order to properly advise our clients and as part of the financial planning and goal developing services, it is sometimes necessary to review, value and provide advice concerning non-securities investments. Such investments may include, but are not limited to, real estate, both personal residences and investment real estate, insurance, traditional savings accounts, alternative financing methods and vehicles and other non-traditional investments.

Our advisory services and financial planning services are tailored to our clients' risk tolerance and other personal considerations.

Wolfrum offers the same services to all of its clients, however, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement ("IPS"), which outlines each client's situation.

Wolfrum does not provide legal advice, nor does it provide specific tax-related services. Wolfrum recommends working with clients' legal counsel and accountants for a well-orchestrated approach to professional portfolio management.

Fees and Compensation

We are a fee-only firm and only receive fees from our clients. We are not paid by third parties such as banks or brokerage firms, nor do we charge commissions. We do not have any "soft dollar" arrangements, nor do we engage in any wrap fee programs.

Fees for the majority of clients are based on assets under management at a rate of 1% annually. Wolfrum uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets under management.

If we charge a client by the hour or have entered into a project arrangement, we invoice the client directly or, at the request of the client, the fees may be deducted from the client's portfolio. Asset-based fees are deducted directly from the clients' accounts by the third party custodian and then remitted to our firm.

Fees are deducted from accounts quarterly in advance. If we bill in advance and a client terminates our services, that client is entitled to a pro rata return of fees, calculated on a daily basis.

In addition to our fees, our investment advisory clients may pay asset-based fees to mutual funds for investment management in the event that any of our clients' assets are invested in mutual funds. In addition to our fees, our investment advisory clients may pay asset-based fees to portfolio managers for investment management in the event that any of our clients' assets are managed by portfolio managers. Our clients will also pay brokerage commissions for each trade that we make in the client's account as well as custodian fees in certain instances. We do not receive any portion of those fees.

Neither our firm nor do any of our principals or employees accept compensation for the sale of securities or other investment products. When we recommend mutual fund investments to our clients, we have a bias towards "no-load" funds with no upfront, deferred, or annual sales charges. We believe these products are generally advantageous to our clients compared to funds with sales charges. Clients may purchase investments that we recommend through brokers or agents that are not affiliated with us.

Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees based upon a percentage of the capital appreciation of assets. Our owner, investment adviser representatives and other employees of Wolfrum may also invest personal money in the same investments as our clients if the investment objectives, risk tolerance and other investment criteria are similar to those of the client. In such cases, Wolfrum personnel invest with the same pricing our clients receive. All Wolfrum personnel must report all trades and security positions to the firm's compliance officer on a quarterly basis. In addition, any new employee must provide a list of all positions held to the compliance officer upon commencement of employment.

Fees are generally negotiable and the final fee schedules are attached to each client's Investment Advisor Agreement ("IA Agreement"). Clients or Wolfrum may terminate their IA Agreement without penalty within five (5) business dates of signing the IA Agreement. Thereafter, clients or Wolfrum may terminate the IA Agreement with a 30-day written notice.

Types of Clients

We generally serve high net worth individuals.

Methods of Analysis, Investment Strategies and Risk of Loss

Wolfrum analysis includes fundamental analysis, which involves the analysis of financial statements, the general financial health of companies and an analysis of the management or competitive advantages, and quantitative analysis, which deals with measurable factors such as the value of assets, cost analysis, historical projections, sales, etc.

Wolfrum uses long term trading strategies, short term, short sales, margin transactions and/or option trading.

We monitor performance of our clients' portfolios on a regular basis, and no less frequently than quarterly, although market and other conditions may lead to more frequent reviews.

As with any investment strategy, a risk of loss exists and clients must bear that risk. We attempt to analyze the extent of the risk in a client's portfolio and assist the client in determining if that degree of risk is appropriate to the client's investment objectives and risk tolerance.

Other Financial Industry Activities and Affiliations

None of the principals/key employees of Wolfrum have outside personal/professional relationships and affiliations that would create a material conflict of interest with our clients. We are only paid by our clients. However, we may make referrals to other professionals such as attorneys, mortgage bankers and insurance agents that we believe would provide good service to our clients. Our relationships with these professionals are always predicated on what we believe is best for the client.

Refer to Scott Wolfrum's ADV Part 2B, which is attached with this Brochure, for more information pertaining to Scott's outside affiliations.

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

We have a comprehensive Code of Ethics that we will provide to any client or prospective client upon request. The basic principal is that we are fiduciaries for our clients and are required to put their interests ahead of our own in advising them.

We do not recommend or purchase for client accounts securities in which we have a financial interest.

We sometimes invest in the same securities as we select for our clients. This only occurs when the investment objectives, risk tolerance and other investment criteria of the Wolfrum associate are similar to those of the client. We invest on the same terms and we are subject to the same pricing as our clients. In the event that purchases or sales are made for clients and for us on the same day, purchases and sales are made first for client accounts.

Brokerage Practices

Wolfrum requires that all advisory client assets remain in the physical possession of a broker, custodian bank, trust company, mutual fund or insurance company. Wolfrum may suggest to its advisory clients that they designate TD Ameritrade ("Ameritrade") as the custodian for their assets in which Wolfrum will provide financial investment advisory services.

Wolfrum has negotiated cost-efficient pricing through Ameritrade on behalf of its clients. Wolfrum currently has the technical capability to electronically interface with Ameritrade and Great Point. In addition, subject to an advisory client's approval, Wolfrum will electronically deduct its advisory fees directly from the advisory client's account. Wolfrum will not assume responsibility or liability for custodians selected by the client.

Wolfrum considered the following factors in selecting a custodian and broker: professionalism, best execution, block trading, quality of execution, reliability, information technology capabilities, integrity, reasonableness of commissions, access to institutional trading and type of clientele.

Commissions are just one of several important factors to consider when choosing the appropriate broker; however, Wolfrum desires the most competitive commissions from brokers for clients' security executions.

Review of Accounts

All accounts are formally reviewed on a periodic basis depending on numerous factors including market conditions, investment strategy changes, changes in individual account asset allocations, changes in investment objective, changes in investment portfolio managers, changes in personnel within investment advisors managing client assets and a variety of other circumstances. As a practical matter, client accounts may be reviewed on an informal basis much more frequently depending on market conditions, investment strategy changes, changes in individual account asset allocations, changes in investment objective, changes in investment portfolio managers, changes in personnel within investment advisors managing client assets and a variety of other circumstances. Account reviews are also triggered by unexpected changes in the market or changing client circumstances.

Clients receive monthly account statements directly from the custodian, either by mail or electronically. Many of our clients have chosen to have direct access online to their accounts through the custodian's web portal.

We also provide quarterly reports which contain information regarding asset allocation, security type, investment objectives, individual securities owned and investment performance. A review and commentary on portfolio activity and market development is also provided. We also attempt to have meetings with clients on a quarterly basis to discuss their portfolio, its performance and to assure that no change in circumstances has occurred that would require revisions to the client's portfolio.

Client Referrals and Other Compensation

We do not receive any monetary compensation from non-clients. We do not compensate any outside party for client referrals. We do not have any "soft dollar" arrangement with any broker/dealer.

Custody

Due to certain services provided to its clients, Wolfrum will have custody of certain client assets, and therefore, complies with the SEC's Amended Custody Rule.

Investment Discretion

Wolfrum may assume certain discretionary authority responsibilities. The terms of discretionary authority will be disclosed through an Investment Policy Statement ("IPS") and IA Agreement, executed by both client and Wolfrum.

Voting Client Securities

We do not vote client securities. Clients can choose to receive proxies and other solicitations directly from the custodian; in our experience, most choose not to receive this information.

Financial Information

Neither Wolfrum, nor its management, has any financial condition that is likely to reasonably impair Wolfrum's ability to meet contractual commitments to clients. Wolfrum nor its management, has been the subject of a bankruptcy petition.

Brochure Supplement

Scott Wolfrum
Wolfrum & Company
President

Scott Wolfrum, born 1967, started Wolfrum & Company during the fourth quarter of 2017. He brings close to 25 years of experience in the financial services industry. Scott earned his degree from Indiana University with a major in Economics.

Prior to founding Wolfrum & Company, Scott was a registered representative of David A. Noyes & Company, a SEC- and FINRA-registered broker-dealer, where he was employed since May of 2013.

Scott previously held the Series 7, 9, 10 and 63, and holds life, health and variable insurance licenses.

Scott is affiliated with The Human Fund as a Member and Manager, the Wolfrum Holdings LLC as a Member, the Foundry Mezzanine Opportunities Fund as a Shareholder, The Giving Tree as President, PrivacyDataSystems as Shareholder, Perfinity Biosciences as Chairman of the Board and investor, MESH Systems as an investor and SuperNova as a Board Member.

There have not been any civil or criminal actions brought against Scott. Nor has there been any administrative proceedings before the SEC or other regulatory authority.

Scott is married to his wife, Amanda, and they have 4 daughters together. He is also a member of the East 91st Christian Church.

This Supplement is attached to, and part of, Wolfrum's Part 2 of Form ADV.