

**Item 1 – Cover Page**

Part 2A of Form ADV

**Wealth Enhancement and Preservation of GA, LLC  
D/B/A**

**“Wealth Enhancement and Preservation”**

**Home Office:**

5755 North Point Parkway, Suite 232  
Alpharetta, GA 30022  
678-739-0175 (phone)  
678-739-0184 (fax)

**Charleston Office:**

201 Coming, Suite C  
Charleston, SC 29403  
843-573-7277 (phone)  
843-573-7298 (fax)

[www.wealthofga.com](http://www.wealthofga.com)

CRD# 172788

March 30, 2020

**This brochure provides information about the qualifications and business practices of Wealth Enhancement & Preservation of Georgia, LLC d/b/a Wealth Enhancement and Preservation (“the Firm” or “WEP”). If you have any questions about the contents of this brochure, please contact us at 678-739-0175. 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 Wealth Enhancement & Preservation of Georgia, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration does not imply a certain level of skill or training.**

## Item 2 – Material Changes

This Brochure dated March 30, 2020, is the annual amendment to the Brochure for Wealth Enhancement & Preservation of Georgia, LLC d/b/a Wealth Enhancement and Preservation.

Since the filing of the firm's last annual update on March 29, 2019, subsequently amended July 05, 2019, we have changed our primary business name from "Infinite Asset Management" to "Wealth Enhancement and Preservation" and have added detail about alternative investments that are currently made available. We have also made various other updates to our Brochure, but no other material changes were made.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at 678-739-0175.

Additional information about the firm is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

## Item 3 - Table of Contents

Item 1 – Cover Page .....	i
Item 2 – Material Changes .....	ii
Item 3 - Table of Contents .....	iii
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation .....	7
Item 6 – Performance-Based Fees and Side-By-Side Management .....	9
Item 7 – Types of Clients.....	9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	9
Item 9 – Disciplinary Information .....	11
Item 10 – Other Financial Industry Activities and Affiliations .....	11
Item 11 – Code of Ethics .....	11
Item 12 – Brokerage Practices .....	12
Item 13 – Review of Accounts .....	13
Item 14 – Client Referrals and Other Compensation.....	14
Item 15 – Custody .....	14
Item 16 – Investment Discretion .....	14
Item 17 – Voting Client Securities.....	14
Item 18 – Financial Information .....	14
Privacy Policy .....	14

## Item 4 – Advisory Business

Wealth Enhancement and Preservation (“the Firm” or “WEP”) was established in 2002 and approved as a Registered Investment Adviser in 2014. The firm formerly operated under the business name “Infinite Asset Management”. Darrin Cohen is the principal owner of the Firm. WEP’s home office is located at 5755 North Point Parkway, Suite 232, Alpharetta, GA 30022. The home office phone number is 678-739-0175. WEP also has a branch office located at 210 Coming, Suite C, Charleston, SC 29403. The SC branch phone number is 843-573-7277.

### Investment Advisory Services

The Firm provides advisory services, giving continuous advice based on the client’s individual needs through personal discussions in which goals and objectives, based upon the client’s personal objectives are established. The Firm will develop a personal investment policy based upon an investment objective questionnaire and/or personal interview and manage the portfolio according to the criteria.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client’s instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, the Firm will notify the client that, unless the instructions are modified, it may cancel the instructions in the client’s account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund.

WEP also offers a wrap fee program. In a wrap fee program, clients are charged an all-inclusive wrap fee on Program Assets that covers advisory, execution, custodial and reporting services on Eligible Assets. A portion of these fees will be paid to WEP for advisory services. In a non-wrap fee program, WEP’s fees are charged separately and in addition to brokerage custody fees, commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in the fund’s prospectus. Such charges, fees and commissions are exclusive of and in addition to WEP’s fee, and WEP shall not receive any portion of these commissions, fees, and costs. Please see the attached Part 2A Appendix (the Wrap Fee Brochure) for additional information about the firm’s wrap fee program.

Additionally, the Firm may provide advice in the form of a Financial Plan. Clients may receive a written plan in conjunction with the advisory services, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

Information on clients will be gathered by in-depth personal interviews and a review of personal financial information including data concerning current financial status, future requirements, risk appetite and goals. Based upon this thorough review, a written plan may be prepared for the client providing the client with a detailed plan designed to achieve their stated financial goals and objectives. If such a plan is provided it is recommended that the client review this plan with tax accountants, attorneys and other professional service providers.

### Use of Model Portfolios

The Firm offers the following model portfolios. Clients will be placed in one or more models based on the information gathered during our interviews and review of personal financial information.

1. **Relative Strength** - A dynamic asset class investment strategy that uses Point & Figure<sup>1</sup> data to evaluate the strength of six asset classes: Domestic Equity, International Equity, Fixed Income, Foreign Currencies, Commodities, and Cash. ETFs representing the best performing two asset classes compared to each other and cash are selected for investment.
2. **Moving Averages** - A Trend following model that determines whether or not to invest in 5 asset classes and 20 underlying investments based on the current 200-day moving average.
3. **Economic** - Uses 16 indicators grouped in four categories to determine whether or not to be long the S&P500 or in cash. The four categories:
  - a. **Monetary indicators** include levels, changes, and differences in various interest rates, monetary policy, and money supply.
  - b. **Technical indicators** reflect levels, changes, and other measures of stock market activity.
  - c. **Sentiment indicators** gauge emotion in the market.
  - d. **Fundamental indicators** describe economic and valuation activities. These include measures of inflation, growth, and other factors related to the overall economy
4. **Momentum** - An active strategy that can go long, short, or to cash in four asset classes (US Equities, Euro, Gold, and Oil) using Japanese Renko<sup>2</sup> charts to determine current momentum.
5. **Equity Income** –
  - a. The company must be number 1 in its industry and/or have top brand names.
  - b. The company must have consistent profit margins and enormous pricing power.
  - c. The company must have a "fortress" balance sheet. This means they have enough cash or near cash assets to pay off debt multiple times over.
  - d. The company has less than average price volatility; profit margins and cash flow are better than S&P500 average.
  - e. The company must have consistently shown increased dividends, though past yields are no guarantee of future yields.
6. **Managed Growth** - Uses a sector rotation model to identify major themes in the market, have exposure to those sectors controlled by demand and eliminate exposure to those sectors controlled by supply. The portfolio attempts to capture the stronger trends and avoid the weaker trends.
7. **Diversified Strategic Income** - The premise behind our Income portfolio is to choose asset classes that historically pay high dividends, though past yields are no guarantee of future yields, and diversify investments within those classes using ETFs, Closed End Funds, and securities trading intra-day. Designed to provide maximum liquidity along with high income. The main objectives for the portfolio are to generate a 5-7% current yield and preserve the overall portfolio value.

### Use of Alternative Investments

As detailed in Item 10 below, some associated persons of WEP are also registered as registered representatives ("RR") of Triad Advisors, LLC ("Triad"), a broker/dealer and FINRA member firm. These individuals are subject to Triad's compliance policies and procedures and supervisory oversight.

Triad's general policy prohibits an RR from recommending for purchase any "alternative investments" through custodians not affiliated with Triad. For purposes of this disclosure, "alternative investments" include, but are not limited to, limited partnerships, limited liability companies, private investment funds or

other pooled investment vehicles, real estate partnerships and REITs. Notwithstanding the foregoing, Triad has approved a limited number of alternative investment sponsors and/or products, which will be available for RR's to recommend for purchase via custodians not affiliated with Triad. Triad will be compensated directly by the product sponsor for its review of the product/sponsor and for Triad's associated compliance and supervisory oversight of all transactions conducted in connection with these approved sponsors and products. For more information on these fees please go to [www.compliance.com/customer-information](http://www.compliance.com/customer-information). Neither WEP nor any RR will receive a share of Triad's compliance and supervisory fee.

Clients are advised that there may be other alternative investment sponsors and/or products not recommended by WEP that are suitable for the client and that may cost more or less than those recommended by WEP. While Triad reviews numerous alternative investment sponsors and/or products on an on-going basis, Triad approves only a select number of sponsors/products pursuant to its due diligence requirements and reviews. Accordingly, your ability to obtain alternative investments through WEP will be limited to those Triad approved products. While you are free to explore various alternative investments independent of WEP, such investments cannot be obtained by means of WEP's guidance or recommendation.

#### Services to Managing Investment Advisers

WEP may act as a Sub Adviser ("SA") for other Managing Investment Advisers ("MIA"). In its capacity as SA, WEP shall have no authority act for or represent the MIA. WEP will manage assets as described above and will take discretionary authority over the assets. Assets will be managed in accordance to the investment objectives, policies and restrictions as provided by the MIA. The MIA will review the client's financial objectives at least annually and will promptly provide any changes to the client's financial circumstances or investment objectives to the SA. Upon request, WEP will make economic and investment analysis and reports available for review.

#### Consulting Services

From time to time, clients may retain WEP for specific projects, general consulting services or financial planning. An example of such consulting is the review of a third party money manager or alternative investment product. Such projects generally require a clear understanding of the client's current financial situation, as well as the client's short- and long-term financial goals and objectives. Clients may be asked to provide information pertaining to their assets, liabilities, income, expenses, income and estate taxes, trust agreements, wills, investments, insurance, personal and family obligations, and employee benefit programs. Careful consideration also will be given to subjective factors such as the client's prior investment experience, risk comfort level, and knowledge of investment vehicles available on the market. Once the client's financial goals and objectives have been established, WEP will provide a written report to address project specified. Clients may choose to have WEP implement the plan or implement the plan through other means.

#### Retirement Plan Services

WEP also provides pension consulting services to businesses where the firm provides plan level services such as discretionary management services, non-discretionary management services, and investment advisory services related to different types of retirement plans. When providing management services, the firm is responsible for implementing recommendations. When the firm is providing advisory services, the client is responsible for implementation of recommendations.

As of December 31, 2019 WEP held \$132,000,000 in assets under management on a discretionary basis.

## Item 5 – Fees and Compensation

### Investment Advisory Services

The specific manner in which fees are charged by the Firm is established in a client's written agreement. Fees are based on a percentage of assets under management and calculated at an annual rate and billed in advance on a quarterly basis. Fees are based on the assets in the account per the schedule below and in some instances, may be negotiated. Slightly higher fees may be charged for certain strategies.

#### **FEE SCHEDULE**

Account Size:	Fee percentage:
\$0 - \$999,999.99	1.5%
\$1,000,000.00 - \$2,499,999.99	1.25%
\$2,500,000 - \$Unlimited	1.00%

The initial fee is due upon the client's opening and funding an account. The initial fee will be based on the opening balance and will be prorated according to the number of days remaining in the calendar quarter. Thereafter, the fee for each calendar quarter will be calculated by multiplying the fair market value of the assets in the account as of the last trading day of the preceding calendar quarter by the annual fee and then dividing that result by four. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar quarter and unearned fees will be rebated to the client. Rebated fees will be credited to the account automatically. Clients may elect to transfer the balance or request a check for the balance in the account. The cost for creating Financial Plans is included in the fees listed above.

As noted in the clients' Advisory Agreement all fees are debited directly from client accounts and are calculated using the total assets in the account as shown on the client custodial statement.

Please see the attached Part 2A Appendix (the Wrap Fee Brochure) for additional information about the firm's separate wrap fee program.

### Billing to Managing Investment Advisers

For services provided and the expenses assumed for this program, the MIA will pay WEP up to 0.50% of the account size. This fee is for WEP's services only and does not cover transactions or the fee charged by your MIA. Fees stated are annual but are computed daily and billed quarterly in accordance to your agreement with the MIA. If the fee payable to WEP begins to accrue after the beginning of any month or if the Agreement is terminated before the end of any month, the fee shall be prorated. For purposes of calculating fees, the value of net assets shall be computed in the manner specified in the Prospectus and the Statement of Additional Information for the computation of the value of the net assets in connection with the determination of the net asset value of applicable shares. Payment of said compensation shall be the sole responsibility of the Managing Investment Advisor and shall in no way be an obligation of any fund, trust, or Client Account. Deposits or withdrawals greater than \$50,000 during the calendar quarter will be prorated and charged or rebated, as applicable.

### Consulting Services

Consulting fees are generally as a one-time fee based on the scope of the project requested. Fees are generally charged at a rate of \$250 per hour or may be charged based on a project ranging from

\$2,500 to \$25,000 per project. Fees are negotiable and based on the complexity of the project and the estimated amount of time required to complete the project. For example, a basic financial plan includes retirement planning and investment analysis and builds on it by adding a cash flow/net worth analysis, and a review of basic insurance, estate planning, and tax issues; while a comprehensive financial plan would include estate planning, business planning, other customized needs planning, and could also include consultation with outside professionals, such as CPA's and/or attorneys. Fees for a comprehensive financial plan would be higher than those charged for a basic financial plan. Given that each client has different needs, WEP will discuss with you the estimates of both time and hourly rates required to complete your plan and document that discussion in a client service agreement before work begins so that the client has a clear view of the process and costs.

Fees for consulting are due and payable upon completion and presentation of the project. WEP may request a retainer upon completion of the initial fact-finding session; however, advance payment will not exceed \$500 for work that will not be completed within six months.

#### Retirement Plan Services

Fees charged for retirement plan consulting services may be charged in advance or in arrears depending on the service provided. Fees may be fixed or asset based (not to exceed 1.50% annually), and are negotiable depending on the complexity of the service. Fees may be deducted directly from the retirement plan on a quarterly basis, or clients may elect to alternatively pay fees by check or wire transfer.

Services may be terminated at any time by either party with 30 days written notice to the other party, and fees will be prorated accordingly. Any payments made in advance will be prorated and refunded to the client.

All retirement plan consulting fees paid to WEP are separate and unrelated to any fees or expenses assessed by any broker, custodian, or other outside party.

#### Other Charges

The advisory fees and transaction charges do not cover charges imposed by third-parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund charges asset management fees, which are in addition to the advisory fees charged by our firm. The fees charged by such funds are disclosed in each fund's prospectus. Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory agreement. Also, there is a \$100 per year custodial account fee minimum. The Management Fee does not cover fees and charges in connection with: debit balances; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law.

Most of the Firm's Investment Adviser Representatives are also registered broker-dealer representatives of Triad Advisors, LLC. The Firm does not utilize the Triad Advisors brokerage firm for any of their clients' advisory accounts.

#### Account Termination

The client and/or the Firm may initiate termination of the contract with 30 days' notice by sending written notice to the contra party and will be accepted the day that it is received by the contra party. A full refund will be provided without penalty if the client terminates the contract within 5 business days



of signing the advisory agreement. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar quarter and excess fees will be rebated to the client.

Upon written receipt of notice to terminate its client agreement and unless specific transfer instructions are received, the Firm and its agent will cease advisory services. Should the client provide specific instructions to liquidate, the Firm will proceed with liquidation of the client's account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, the client should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor. Factors that may affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. The Firm and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

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

The Firm does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

The Firm provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates, and trusts. The minimum account size is \$500,000 which is aggregated by household. The Firm has the discretion to waive the account minimum.

Certain managers may require a higher minimum as disclosed in the individual manager's Firm Brochure. Under certain circumstances, the minimum may be waived, including related accounts that may be combined to meet the minimum if the services involved may otherwise be provided.

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

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds and fixed income securities.

Investment recommendations are based on an analysis of the client's individual needs and are drawn from research and analysis. Security analysis methods may include the following:

- **Fundamental analysis:** We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. Fundamental analysis does not attempt to anticipate market movements. This presents a

potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

- Technical analysis and charting: We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at any time and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

Information for this analysis may be drawn from financial newspapers and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves a risk that clients should be prepared to bear. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of Firm or the integrity of Firm's management. Firm has no information applicable to this Item.

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

Individuals associated with the Firm as an Investment Adviser Representative ("IAR") may also be registered with Triad Advisors, member FINRA/SIPC, as a Registered Representative ("RR"). Brokerage services are offered separately from investment advisory services. Any such transactions may be facilitated through Triad Advisors in their capacities as registered representatives. Clients will be charged separately from their advisory services. If a trade error were to occur, it may result in profit or loss to the firm. The firm has controls in place to limit such trade errors. Investment Advisers will not participate in any profits resulting from such errors.

IARs may also be licensed to sell insurance products through various insurance companies that are unaffiliated with the Firm. The client is under no obligation to utilize the services of your IAR in the purchase or sale of securities, insurance or futures products through his/her association with Triad Advisors or with an insurance company. However, any transactions you may effect through your IAR in conjunction with those relationships may result in the receipt of commissions and other compensation separate from any advisory fees we charge.

Although the Firm may recommend that clients establish accounts at a custodian, it is the client's decision to custody assets with a particular custodian. The Firm is independently owned and operated and not affiliated with any custodian.

Information about your IAR's financial industry activities and affiliations is disclosed in the IAR's Brochure Supplement which you will receive with this brochure. Additional information about your IAR is also available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 11 – Code of Ethics**

The Firm has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at the Firm must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of the Firm may buy or sell securities that are recommended to clients. The Firm's employees and persons associated with the Firm are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of the Firm and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for the Firm's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of the Firm will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt

transactions, based upon a determination that these would not materially interfere with the best interest of the Firm's clients. In addition, the Code requires pre-approval of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between the Firm and its clients.

Advisors may recommend and trade in the same securities with clients and/or related accounts at or about the same time. Generally, this would pose a conflict if the Advisor or related account were given a better price than the client. To mitigate this conflict, it is procedure to not trade an Advisors account or related persons account on the same day as a client unless the client gets the better price.

Trades may be done on an aggregated basis when consistent with the Firm's obligation of best execution. In such circumstances, the Advisor (or related account) and client accounts will share commission costs equally and receive securities at a total average price. The Firm will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

The Firm's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the Compliance Department at our main number.

## **Item 12 – Brokerage Practices**

We generally recommend the brokerage and custodial services of an outside custodian. The custodian will be a registered broker-dealer that charges brokerage commissions or transaction fees for effecting securities transactions. In recommending a custodian, we endeavor to fulfill our duty to obtain "best execution" for the transactions in our clients' accounts. When we seek best execution, the determinative factor is not necessarily the lowest possible transactional cost, but whether the transaction is executed in the most advantageous manner in terms of quality. To assess quality, we evaluate many factors, including competitiveness of price spreads, timeliness of execution and reporting, frequency and correction of trading errors, back office and trade settlement capabilities, and responsiveness to our orders and needs. The Firm is not affiliated with any custodian.

Our custodians also make available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both from custodians/brokers and from third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at a particular custodian. In addition to investment research, our custodians may also make available software and other technology that provide access to client account data, facilitates trade execution for multiple client accounts, provides pricing and other market data, facilitates payment of our fees from our clients' accounts, and assists with back-office functions, recordkeeping, and client reporting.

Our custodians may also offer other services intended to help us manage and further develop our business. These services can include educational conferences and events, consulting on technology, compliance, legal, and business needs, publications and conferences on practice management and

business succession, and access to employee benefits providers, human capital consultants, and insurance providers.

The availability of these services from our custodian benefits us because we do not have to produce or purchase them. Of course, this may give us an incentive to recommend that you maintain your account with a custodian based on our interests rather than yours, which is a conflict of interest. We believe, however, that our selection of our custodians and brokers is in the best interests of our clients, and is primarily supported by the scope, quality, and price of services provided and not the custodians' services that benefit only us.

You may direct us in writing to use a particular custodian to execute some or all of the transactions for your account. If you do so, you may be responsible for negotiating the terms and arrangements for the account with that custodian.

We may not be able to negotiate commissions, obtain volume discounts, or best execution with custodians with which we do not have a pre-existing relationship. A difference in transaction fees and expenses may also exist between those charged to clients who direct us to use a particular custodian and other clients who do not.

You and our other clients can benefit when we aggregate trades to obtain volume discounts on execution costs. Trade aggregation refers to the practice of combining orders for execution. When consistent with our duty to obtain best execution, we will aggregate multiple client transactions into a single order in order to obtain the best price for our clients. In such circumstances, the accounts will share commission costs equally and receive securities at a total average price. Firm will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

Although the brokerage and/or transaction fees paid by clients shall comply with the firm's duty to obtain best execution, a client may incur costs that are higher than another qualified broker-dealer might charge to effect the same transaction. In seeking best execution, the determinative factor is not necessarily the lowest possible cost, but whether the transaction is executed in the most advantageous manner in terms of quality. To assess quality, we evaluate many factors, including full range of a broker-dealer's services, competitiveness of price spreads, timeliness of execution and reporting, frequency and correction of trading errors, back office and trade settlement capabilities, and responsiveness to our orders and needs.

### **Item 13 – Review of Accounts**

Account reviews are conducted by the Advisor. Account performance is reviewed not less than quarterly. Factors that are considered during such reviews include but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, monthly distributions, concentrated positions, diversification, and outside holdings. Examples of situations that may impact Client's account would be the following: performance that is not in line with the client's "downside risk tolerance," change in investment objective, the client makes a significant addition of capital or withdrawal of capital from the account, rebalancing of the portfolio if current allocation and targeted allocation are not consistent, concentrated position that could lead to volatility, etc.

The client agrees to inform the firm in writing of any material changes to the information included in the questionnaire or any other change in the client's financial circumstances that might affect the manner in

which client's assets should be invested. Clients may contact the firm during normal business hours to consult with the firm concerning the management of the client's account(s).

All managed accounts receive account statements monthly if there is activity in the account and quarterly at a minimum. We offer a quarterly review and performance report to all clients upon request.

### **Item 14 – Client Referrals and Other Compensation**

The Firm does not receive an economic benefit by anyone other than the client for providing investment advice and other advisory services. The Firm may however receive occasional client event marketing expense reimbursements from product vendors.

The Firm does not compensate others for client referrals.

### **Item 15 – Custody**

Clients should receive statements at least quarterly from their custodian that holds and maintains your investment assets. The Firm urges you to carefully review such statements and compare the official custodial records to the account statements and performance reports that we may provide you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

Firm usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. Clients must authorize such discretion in the advisory agreement. When selecting securities and determining amounts, Firm observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Firm in writing.

### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, Firm does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients should contact their financial advisor if they have any questions and/or to obtain this information. Clients will receive their proxies directly from their custodian or transfer agent.

### **Item 18 – Financial Information**

Registered Investment Advisers are required to provide you with certain financial information or disclosures about Firm's financial condition. Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy proceeding.

### **Privacy Policy**

We collect nonpublic personal information about you from the following sources: Information we receive on applications or other forms and information about your transactions with our affiliates, others, or us. Information collected includes social security numbers, income, account balances, and types and amounts of investments and transactions. We do not disclose any non-public information

about our current or former customers to anyone, except as permitted by law or in order to provide the current services. Our employees have limited access to your personal information based on their responsibilities to provide products or services to you. Be assured that we maintain physical, electronic and procedural safeguards in compliance with federal standards to protect your information.

We collect and share your information for our everyday business purposes. Information is shared with one or more of our affiliated entities, at our sole discretion and for purposes either related or unrelated to services we provide you, and to nonaffiliated entities that either perform services for us or function on our behalf (such as check printing services, account aggregation providers, broker/dealers, investment companies, and insurance companies). Affiliates are companies related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates are companies not related by common ownership or control. They can be financial and nonfinancial companies. We share personal client information with Triad Advisors, LLC, a nonaffiliated registered broker/dealer."

WEP will disclose customer information to and receive customer information from Triad for the purposes of offering additional products and services to you as well as to effect, administer, service and enforce your requested transactions and maintain and service your accounts. Triad may also continue to use personal information they receive from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

If the IAR servicing your account leaves us to join another firm, he/she is permitted to retain copies of your information so that he or she can assist with the transfer of your account and continue to serve you at their new firm.

"Opting-out" of Third Party Disclosures: If you do not want your Investment Advisor to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact our Compliance Department by calling 678-739-0175.