

# **FORM ADV PART 2A BROCHURE**

## **Align Wealth Management, LLC**

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This brochure provides information about the qualifications and business practices of Align Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 405.607.4820. 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 Align Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Align Wealth Management, LLC is 131482.

Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## **Item 2 Summary of Material Changes**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last Annual Updating Amendment dated March 18, 2019, we have no material changes to report.

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## Item 4 Advisory Business

Align Wealth Management, LLC ("Align") is a registered investment advisor located in Oklahoma City and Tampa Bay. Align provides fee-only wealth management and financial planning services to high net worth individuals, families and small business owners. We have continuously provided wealth management services since 1993. Our advisory representatives are Certified Financial Planners™ who can help you manage your investments, plan your retirement, reduce your taxes, minimize your risks, and leave a legacy to your loved ones.

As used in this brochure, the words "we", "our" and "us" refer to Align Wealth Management, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs.

Currently, we offer portfolio management services, financial planning, and pension consulting.

### **Portfolio Management Services**

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for portfolio management services, we meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We 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 customize an investment portfolio for you in accordance with your risk tolerance and investing objectives. Once we construct an investment portfolio for you, we monitor your portfolio's performance on an ongoing basis, and will rebalance your portfolio as required by changes in market conditions and in your financial circumstances.

As a client of our discretionary portfolio management services, it is necessary that you grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm 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. All transactions will be executed in accordance with your written Investment Policy Statement. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm, a power of attorney, or trading authorization forms.

### Sub-Advisers

As part of our portfolio management services, we may use one or more sub-advisers to manage a portion of your account on a discretionary basis. The sub-adviser(s) may use one or more of their model portfolios to manage your account. We will regularly monitor the performance of your accounts managed by sub-adviser(s), and may hire and fire any sub-adviser without your prior approval. The sub-adviser we use will charge a fee in addition to our fee. However, you will not pay our firm a higher advisory fee as a result of any sub-advisory relationships.

### **Financial Planning Services**

As part of our portfolio management service, we offer financial planning services at no additional charge. Financial planning typically involves providing a variety of advisory services to clients regarding the management of their financial resources based upon an analysis of their individual

needs. These services can range from broad, comprehensive, financial planning to consultative or single subject planning such as retirement income planning. If you need financial planning services, we will meet with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position and to define and quantify your long-term goals and objectives. Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we will deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present your plan to you. Therefore, it is important that you promptly notify us if your financial situation, goals, objectives, risk tolerance, or needs change.

### **Pension Consulting Services**

We offer pension consulting services to employee benefit plans (such as 401(k) plans) 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. Depending on the agreement entered into with the plan fiduciary, we may act as a 3(38) fiduciary and make investments decisions on behalf of the plan, including providing access to our managed portfolios. These services are considered discretionary in nature.

We may also assist with participant enrollment meetings and provide investment-related educational seminars to plan participants on such topics as:

- Diversification
- Asset allocation
- Risk tolerance
- Time horizon
- Retirement Income Planning

Our educational seminars may include other investment-related topics specific to the particular plan.

We may also provide additional types of pension consulting services to plans on an individually negotiated basis. All services, whether discussed above or customized for the plan based upon requirements from the plan fiduciaries (which may include additional plan-level or participant-level services) will be detailed in a written agreement and be consistent with the parameters set forth in the plan documents.

### **Use of Third Party Service Provider**

**Forum Financial Management, LP.** We have engaged Forum Financial Management, LP ("Forum") as a third party service provider for the provision of back office services for the benefit of Clients' accounts. We pay Forum a fee for its services, which include, but are not limited to, account administration, technology, and trading. Clients are not charged any additional fees for Forum's services. We share relevant Client information with Forum. Forum maintains a privacy policy whereby Forum does not disclose non-public information obtained from us to any non-affiliated third parties, except as required to process transactions on Client's behalf. Additional information about Forum is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Types of Investments**

We primarily offer advice on institutional asset class funds, index funds, exchange traded funds ("ETFs"), and individual bonds. Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any legacy investments held in your portfolio at the inception of our advisory relationship.

### **Wrap Fee Program(s)**

We offer a wrap fee program through TD Ameritrade, Inc. ("TD Ameritrade") and Charles Schwab & Co., Inc. ("Schwab"). A wrap fee program is a type of investment program that provides clients with portfolio management services and/or custodial and/or brokerage services for a single fee that includes administrative fees, management fees, and transaction costs. If you participate in our wrap fee program, you will pay a single fee, which includes our portfolio management fees, certain transaction costs, and custodial and administrative costs. We will receive a portion of the wrap fee for our services. The overall cost you will incur if you participate in the wrap fee program may be higher or lower than you might incur by separately purchasing the types of securities and services available in the program.

Under the wrap fee program, transactions for your account are executed by TD Ameritrade or Schwab, securities broker-dealers and members of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. To compare the cost of the wrap fee program with non-wrap fee portfolio management services, you should consider the frequency of trading activity associated with our investment strategies and the brokerage commissions charged by TD Ameritrade, Schwab, or other broker-dealers, and the advisory fees charged by investment advisers. Please refer to Form ADV Part 2A Appendix 1 for further information on this program. See also Item 7 below for the minimum account size requirements.

### **Right to Terminate and Request a Refund**

Either party may terminate the Investment Advisory Agreement ("Agreement"), without penalty, at any time by giving written notice to the other party. If you decide to terminate the Agreement within one year after the effective date, you will, upon written request, receive a full refund of all management fees paid to Align. Termination is effective upon our actual receipt of written notice. In the event of your death, disability, or incompetency, your executor, guardian, attorney-in-fact or other authorized representative may authorize us to continue serving as investment adviser to you or your estate. Upon termination, our management fees will be pro-rated through the date of termination and you will authorize us to deduct same from your Account. Termination will not preclude the consummation of any transaction initiated prior to our actual receipt of written termination. Upon termination, all parties are relieved of all obligations and we will have no duty to take any action with regard to your Account.

### **Assets Under Management**

As of March 1, 2020, we provide continuous management services for \$332,950,000 in client assets on a discretionary basis and \$0 in client assets on a non-discretionary basis.

## **Item 5 Fees and Compensation**

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

Our fees are billed on a quarterly basis in arrears and are calculated on the total portfolio value of the assets under management. Fees are calculated in accordance with the following tiered schedule:

<b>Combined Account Size</b>	<b>Annual Fee</b>
First \$1,000,000	1.00%
Next \$2,000,000	0.90%
Next \$2,000,000	0.75%
Next \$5,000,000	0.60%
Over \$10,000,000	0.40%

Please refer to the "Advisory Business" section in this Brochure for additional information on our advisory fees, fee deduction arrangements, and refund policy according to each service we offer.

### **Pension Consulting Services**

Our fees are billed on a quarterly basis in arrears and are calculated on the plan size in accordance with the following tiered schedule:

<b>Plan Size</b>	<b>Annual Fee</b>
First \$1,000,000	0.60%
Next \$2,000,000	0.50%
Next \$2,000,000	0.45%
Next \$5,000,000	0.40%
Over \$10,000,000	0.30%

The recommended plan minimum is \$500,000. If a plan is less than \$500,000 at the end of a calendar quarter, the Advisor management fee for that quarter will be \$750. A plan sponsor may elect to subsidize any part of our advisory management fee.

Our advisory management fee is not included in the expense ratio of the plan mutual funds. We do not receive compensation from any party other than the plan participants and/or the plan sponsor.

Where we utilize a sub-adviser, fees charged by such sub-adviser are separate and apart from our fee. We do not share in the fee charged by the sub-adviser nor does the sub-adviser share any portion of our fee. The fees you pay Align when we use a sub-adviser will not be any more than you would pay Align if we did not use the sub-adviser. The specific amounts to be charged will be set forth in your advisory contract.

### **Additional Fees and Expenses**

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). These fees will generally include a management fee and other fund expenses. We do not receive any compensation from mutual funds or exchange traded funds. You may 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 which 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. We pay close attention to the total cost of our investments and can provide that information upon request. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

### **Legacy Variable Annuities and Other Commissionable Investment Products**

In order to service legacy variable annuities and/or other legacy commissionable products that clients own prior to engaging us, an administrative employee of our firm is licensed as a registered representative with Purshe Kaplan Sterling, a securities broker-dealer, and a member of the Financial Industry Regulatory Authority and the Securities Investor Protection Corporation. In her capacity as a registered representative, this person 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. In such cases, the compensation earned by this person in her capacity as a registered representative would be separate and in addition to our advisory fees. Accordingly, this person could have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the client's needs, which would create a conflict of interest. Therefore, in an effort to eliminate that conflict, we do not permit this person to offer or effect securities transactions with advisory clients as a registered representative of a broker-dealer. It is our policy that we permit such person to retain her registered representative status solely to service any variable annuity contracts or other commissionable products that clients own when they open an account with us which they do not want to leave with their prior broker-dealer or custodian. Clients are under no obligation, contractually or otherwise, to utilize this service and may hold such securities products with any broker-dealer or custodian of their choosing. Align does not charge fees for or receive income from this particular business activity. This service is made available as a convenience to the client and only upon the client's specific request.

### **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 execute with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf could 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 sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits.

As a participant in a qualified retirement plan with a previous employer, you 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 or higher 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 or lower 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 plan 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 an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan from 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 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.

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

We do not accept performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of the capital appreciation of a client's account. Our fees are calculated as described in the **Fees and Compensation** section above and are not charged on the basis of a share of the capital appreciation of your account.

## Item 7 Types of Clients

We offer investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, 401(k) plans and other business entities.

In general, we require a minimum account size of \$2,000,000 for our Wrap Fee Program. We may, in our sole discretion, waive the minimum account size for certain legacy clients in the Wrap Fee Program. Additionally, we generally require a minimum account size of \$750,000 for our standard portfolio management service. At our discretion, we may waive or lower this minimum account size. We may also combine account values for you and your family members and other related accounts to meet the stated minimum.

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

Our investment strategies and advice may vary depending on each client's specific financial situation. We determine investments and allocations based on your objectives, risk tolerance, time horizon, financial situation, liquidity needs, and other relevant suitability factors. Modern Portfolio Theory is our predominant method of analysis. Modern Portfolio Theory (MPT) is a theory of investment which attempts to maximize portfolio expected return for a given level of portfolio risk and/or minimize risk for a given level of expected return, by carefully diversifying the proportions of various asset classes. We generally utilize investment strategies involving long term purchases with the expectation that the total value of the investments will grow over a relatively long period of time, generally greater than five years.

### A. Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets. We analyze mutual funds by their historical performance, standard deviation, correlation with other mutual funds and the funds' mandates for exposure to the market as explained in the prospectus, among other factors. Align primarily recommends mutual funds offered by DFA for use in its managed portfolios but may include other funds and individual securities at its discretion. DFA mutual funds follow a diversified asset class investment philosophy with relatively low fees and low turnover of holdings. Align seeks to design portfolios that have a broad exposure to the total stock market both domestically and internationally. Statistical tests are performed on the portfolios and combinations of asset classes to determine a mix that will provide our clients with an appropriate risk-return profile. Testing may include, but is not limited to, an analysis of historical returns of different asset class combinations to arrive at an appropriate risk/return profile; analysis of portfolio exposure to different segments of the market to ensure broad market exposure; and analysis of risk factor loads of possible combinations of asset classes to determine appropriate portfolio tilts to one asset class or another.

#### 1. Sources of Information

Align relies on DFA, an SEC Registered Investment Advisor, for a significant part of its investment research as well as research papers, professional publications, magazines and professional seminars.

#### 2. Investment Strategies

Align's investment advice is based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. Align's investment approach is firmly rooted in the belief that markets are efficient and that investor returns are determined principally by asset allocation decisions, not by market timing or stock picking. Align focuses on developing diversified portfolios, principally through the use of DFA's asset class mutual funds that are available only to institutional investors and clients of a network of selected investment advisers. The following is a more detailed explanation:

- Modern Portfolio Theory holds that diversification among investments that have low or negative correlation may reduce the risk of a portfolio without necessarily sacrificing the expected return. Simply put, the idea is to combine investments that do not move in the same direction so that when some investments decline in value others may increase in value. This should lower the volatility, or risk, of a portfolio.
- The Capital Pricing Model identifies two risks, Market Risk and Non-Market Risk. Market Risk is risk that is rewarded - it is the inherent risk of investing in the market and cannot be diversified away. Non-Market Risk is the risk in a specific company, sector or industry that can be reduced through a well-diversified portfolio.

- The Five Factor Model (2015) is based on academic research published by American economists Eugene F. Fama and Kenneth R. French, which identified five factors that explain the return of an asset class.

Align offers clients several models based on varying stock and bond allocations. Align manages portfolios according to five broad mandates: Income, Income & Growth, Growth & Income, Growth, and Aggressive Growth. The five broad mandates are defined as follows:

- Income (0-30% equity, 70-100% fixed income) The portfolio is typically heavily weighted toward mutual funds that have bonds as the primary underlying investment. It is generally designed for investors whose concern is protecting their assets, or who may simply desire a decreased level of market volatility.
- Income and Growth (40% equities, 60% fixed income) The portfolio seeks current income with a secondary objective of growth of capital. This portfolio is suitable for investors who want the potential for some growth of assets, but are more concerned with protecting their principal investment.
- Growth and Income (50% equities, 50% fixed income) The portfolio seeks growth of capital and current income as near-equal objectives. The portfolio's goal is to balance risk and reward.
- Growth (60-70% equity, 30-40% fixed income) The portfolio seeks growth of principal. This portfolio is suitable for investors who are willing to accept risk to have the potential for higher returns over time, and generally have at least a 6 -10 year or longer investment horizon.
- Aggressive Growth (80-100% equity, 0-20% fixed income) The portfolio's goal is to produce growth of principal and as such will have higher volatility. This portfolio is for investors who are willing to accept risk to have the potential for higher returns over time and have at least 10 years before withdrawing from the portfolio.

### 3. Customized Portfolios

Align may vary from the model portfolios in certain situations.

### 4. Client-Selected Portfolios

Clients may retain Align to manage their portfolio in accordance with a model selected by the client that is different from the model portfolio recommended by Align. The client will direct Align to invest their accounts according to the client's selected target allocation. Often, clients have multiple accounts managed as one portfolio. Any purchases or sales of securities in the accounts will be made in an effort to implement the portfolio specified by the client. Plan sponsors engaging Align to provide qualified plan services with the addition of our managed portfolios option will provide plan participants with access to model portfolios managed by Align. Under these circumstances, purchases or sales of securities in the portfolios will be made in an effort to implement the portfolio specified by the participant.

## 5. Changes to Model Portfolios

Align continuously reviews the asset classes included in the model portfolios it recommends. From time to time, we may determine that an asset class should be added to or removed from our model portfolios. On such occasions Align may, at its discretion, determine that such asset classes should also be introduced into current client accounts. Addition or removal of any asset class will not typically change the target equity/fixed income proportion of the portfolios.

## 6. Investments Held Away

Align has, from time to time, advised clients with respect to investment accounts not directly supervised and managed at Align. The accounts include, but are not limited to, 401(k), 403(b), and 529 accounts. The fees for such services will be deducted from the accounts managed by Align. This advice will include asset allocation and fund selection. The fee for assets held away is the same fee for assets under management, which will be evidenced in the advisory agreement. Funds selected will be primarily chosen on their asset class description and fees in a manner consistent with Align's investment philosophy.

## **B. Risk of Loss**

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.

Our investment approach constantly keeps the risk of loss in mind. Investors may face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When inflation is present, a dollar in the future will not buy as much as a dollar today because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the U.S. dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **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. Other examples of illiquid securities include private placement securities, hedge funds, and/or pooled vehicle interests.

### **Tax Considerations**

For taxable accounts, we take a number of steps to maximize after-tax returns. During our investment screening process, we assess the tax-efficiency of each potential holding. Our objective is to identify investments that will deliver solid after-tax returns. We carefully consider whether it makes sense to continue to hold investments that we might otherwise sell when they have built up large unrealized capital gains. We assess the opportunity cost of holding an existing position with a significant unrealized gain vs. selling and generating capital gain taxes. We review a variety of scenarios before making a final sell decision. When markets are volatile on the downside, we look for opportunities to harvest capital losses by selling investments that have unrealized losses that could offset taxable gains on a client's tax return.

If we are planning on selling an investment position with a gain, we will first consider the holding period and if we are close to creating a long-term capital gain, then we may consider holding the position longer in order to allow the client to take advantage of lower tax rates on long-term capital gains. For our taxable accounts, municipal tax-free bonds are often used in lieu of taxable bonds.

### **Item 9 Disciplinary Information**

Neither our firm nor any of our management persons have any material legal or disciplinary events to disclose.

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

W. Brian Puckett, Managing Member/CCO is a Certified Public Accountant ("CPA"). Mr. Puckett is also a licensed attorney in Oklahoma but does not provide legal services to clients at this time. Mr. Puckett spends 100% of his professional time on behalf of Align Wealth Management, LLC.

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

#### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain persons associated with our firm submit reports of their personal account holdings and transactions to a qualified representative of our firm who will review these reports on a periodic basis. Persons associated with our firm are also required to promptly report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting us at the telephone number displayed on the cover page of this Brochure.

### **Participation or Interest in Client Transactions**

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure. However, as noted below we may invest in the same investments as our clients.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you receive. To eliminate this conflict, our policy is that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

## **Item 12 Brokerage Practices**

We endeavor to select brokers or dealers that provide quality services at reasonable commission rates and fees. We believe that our recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers including the value of research provided, the firm's reputation and financial stability, execution capabilities, commission rates, and responsiveness to our clients and our firm.

We typically recommend that you establish brokerage accounts with TD Ameritrade Institutional, a division of TD Ameritrade, Inc., member FINRA/SIPC (hereinafter "TD Ameritrade") or Charles Schwab & Co., Inc., member FINRA/SIPC (hereinafter "Schwab"), among others, to maintain custody of your assets and to effect trades for your accounts.

We participate in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC/NFA. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive benefits from TD Ameritrade through our participation in the program.

We participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our Clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our Clients; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to clients,



we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our recommendation of TD Ameritrade for custody and brokerage services.

We may also recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. The final decision to custody assets with Schwab is at your discretion, including those accounts under ERISA or IRA rules and regulations, in which case you are acting as either the plan sponsor or IRA account holder. We are independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to us other products and services that benefit us but may not benefit our clients' accounts. These benefits may include national, regional or advisor specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of ours by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist us in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from clients' accounts, and assist with back-office training and support functions, record keeping and client reporting. Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at Schwab Advisor Services. Schwab Advisor Services also makes available to us other services intended to help us manage and further develop our business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to us by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us. While, as a fiduciary, we endeavor to act in our clients' best interests, our recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to us of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

**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 typically combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account; however, smaller clients may bear higher charges if they fail to meet the minimum account sizes set by the broker. This practice is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

**Item 13 Review of Accounts**

Brian Puckett, JD, CPA/PFS, CFP® and Dennis Packard, CFP® conduct monthly investment policy meetings and monitor all investment portfolios on a routine basis. We typically recommend review meetings 1 - 4 times annually with clients. For clients who live beyond a reasonable driving distance of our offices, we suggest regular updates via email, phone, and/or web-conferencing, as appropriate. Additional reviews may be conducted as appropriate based on various circumstances, including, but not limited to:

- contributions and withdrawals;
- year-end tax planning;
- changes in your goals;
- security specific events;
- changes in your risk/return objectives; and/or
- material changes in your financial situation.

On a quarterly basis, we will send you a detailed performance report via your personal secure online client portal, encrypted email, or regular U.S. mail that compares your portfolio's performance to a series of relevant benchmarks. You will also receive trade confirmations and monthly or quarterly statements from your account custodian(s).



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

We directly compensate non-employee (outside) consultants, individuals, and/or entities (Solicitors) for client referrals. In order to receive a cash referral fee from our firm, Solicitors must comply with the requirements of the jurisdictions in which they operate. If you were referred to our firm by a Solicitor, you should have received a copy of this brochure along with the Solicitor's disclosure statement at the time of the referral. If you become a client, the Solicitor that referred you to our firm will receive either a one-time fixed referral fee at the time you enter into an advisory agreement with our firm or a percentage of the advisory fee you pay our firm for as long as you are a client with our firm, or until such time as our agreement with the Solicitor expires. You will not pay additional fees because of this referral arrangement. Referral fees paid to a Solicitor are contingent upon your entering into an advisory agreement with our firm. Therefore, a Solicitor has a financial incentive to recommend our firm to you for advisory services. This creates a conflict of interest; however, you are not obligated to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

Solicitors that refer business to more than one investment adviser may have a financial incentive to recommend advisers with more favorable compensation arrangements. We request that our Solicitors disclose to you whether multiple referral relationships exist and that comparable services may be available from other advisers for lower fees and/or where the Solicitor's compensation is less favorable.

We do not receive any economic benefit, compensation or kickback from a non-client in connection with providing investment advice or other advisory services to you.

## **Item 15 Custody**

Provided we receive your written authorization, we will instruct your custodian to directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities.

Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. We will also provide statements to you reflecting the amount of advisory fees deducted from your account. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us at 405.607.4820.

## **Item 16 Investment Discretion**

All accounts are handled on a discretionary basis pursuant to your written investment policy statement defining your goals and objectives, including asset allocation parameters. You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, a power of attorney, and/or trading authorization forms. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s).

## Item 17 Voting Client Securities

We do not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder. In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you.

## Item 18 Financial Information

Our firm does not have any financial conditions or impairments that would prevent us from meeting our contractual commitments to you. We **do not** take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require the prepayment of fees. Therefore, we are not required to include a financial statement with this brochure.

## Item 19 Requirements for State Registered Investment Advisers

We are a federally registered investment adviser; therefore, no response is necessary.

## Item 20 Additional Information

### Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any non affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as Forum, transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of our current privacy policy notice to you on an annual basis. Please contact us at 405.607.4820 if you have any questions regarding this policy.

### Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it would have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing your account. If a trade error results in a profit, you will keep the profit.

**Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.