



Part 2A of Form ADV: *Firm Brochure*

Wescom Financial Services, LLC

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This Brochure provides information about the qualifications and business practices of Wescom Financial Services, LLC. If you have any questions about the contents of this Brochure, please contact us at (888) 879-0558, extension 5104 or operations@wescomfinancial.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Wescom Financial Services, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information you may use to determine to hire or retain an Adviser.

Additional information about Wescom Financial Services, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site using a unique identifying number, known as a CRD number. Our firm's CRD number is 125650.

Item 2 Material Changes

- Since the annual update of our Form ADV Part 2 dated 03/15/2019:
 - The Chief Compliance Officer has changed from Whitney Bullock to Diana Nash.

- Since the last annual update of our Form ADV Part 2 dated 03/30/2020, the following material changes have been made to this brochure:
 - Item 4 – Advisory Business: Added description of new Pathway Program investment platform.

 - Item 5 – Fees and Compensation: Added fee information for new Pathway Program

 - Item 5 – Fees and Compensation: Removed fee disclosure required for State registered advisors only.

 - Item 19 – Requirements for State Registered Advisors: Removed section in its entirety as it is not required for SEC registered advisors.

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Item 4 Advisory Business

Wescom Financial Services, LLC (WFS), is a registered investment advisor, broker-dealer, and a wholly owned subsidiary of Wescom Central Credit Union (WCCU). WCCU is a member owned state chartered credit union serving its members since 1934.

Wescom Financial began conducting business as an investment adviser in 2003 with its principal place of business located in Pasadena, CA. As of 12/31/2019, we were actively managing \$172,438,318 of clients' assets on a non-discretionary basis.

Wescom Financial offers the following advisory services to our clients:

- SELECTION AND MONITORING OF THIRD-PARTY MONEY MANAGERS
- ADVISOR DIRECTED PORTFOLIO MANAGEMENT SERVICES

Selection and Monitoring of Third-Party Money Managers

Wescom Financial Services offers advisory management services to our clients through our Selection and Monitoring of Third-Party Money Managers programs.

Our firm provides the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established. The client's responses are recorded in a risk tolerance questionnaire. Based on the client's individual circumstances and needs (as exhibited in the client's risk tolerance questionnaire we will then perform management searches of various unaffiliated registered investment advisers to identify which registered investment adviser's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment adviser. When the analysis is complete, the client is presented with an Investment Strategy Report ("ISR"), which will contain a detailed analysis of suggested investments. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered. We are available to meet with clients on a regular basis, or as determined by the client, to review the account.

We monitor the performance of the selected registered investment adviser(s). If we determine that a particular selected registered investment adviser(s) is not providing sufficient management services to the client, or is not managing the client's portfolio in a manner consistent with the client's risk tolerance questionnaire, we may suggest that the client contract with a different registered investment adviser and/or program sponsor. Under this scenario, our firm assists the client in selecting a new registered investment adviser and/or program. However, any move to a new registered investment adviser and/or program is solely at the discretion of the client.

We currently solicit clients to participate in the following third-party asset management programs:

- SEI Advisory program
- AssetMark
- Envestnet Managed Account Solutions

SEI Advisory Program

The SEI Advisory program ("SEI") is an investment advisory program available to clients through arrangements SEI has with Wescom Financial Services. As of 12/31/2019 we oversee \$89,869,054 of assets on a non-discretionary basis through this program.

Clients will complete account opening paperwork, including a risk tolerance questionnaire, which will help the Advisor Representative in selecting an appropriate mutual fund implementation strategy for the client. Once the client has selected a mutual fund implementation strategy, SEI will manage the client's assets allocated to the strategy on a discretionary basis within the client's selected strategy.

Client meetings are available on a regular basis, or as determined by the client, to review the account. We meet with the client to review and update, as necessary, the client's strategy. However, should there be any material change in the client's personal and/or financial situation, we should be notified immediately to determine whether any review and/or revision of the client's strategy is warranted.

Clients should also refer to SEI's disclosure document (Form ADV Part 2) for a full description of the services offered in this program.

Should the client's individual situation change, the client should notify Wescom Financial Services, who will assist the client in revising the current portfolio and/or re-evaluate their financial situation to determine if a different model portfolio would be appropriate to the client's new situation.

Clients should also refer to SEI's disclosure document (Form ADV Part 2) for a full description of the services offered in the SEI Mutual Fund Program.

AssetMark

We also offer advisory management services to our clients through AssetMark. As of 12/31/2019, we managed \$76,358,537 of assets on a non-discretionary basis through this program.

Our firm provides the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established. This asset allocation strategy is drafted into the client's Investment Policy Statement ("IPS").

When consistent with a client's IPS and needs, we may recommend the use of AssetMark registered Investment Advisers and the sponsors of mutual fund asset allocation programs. AssetMark has contracted with a number of institutional investment management firms ("Strategists") to create a variety of asset allocation models and has identified a broad range of no-load or load mutual funds, annuities, or separate account managers for the Strategists to use in these models. The asset allocation programs are designed as

a means for us to tailor the portfolio design services of the Strategists to the client's individual needs. We are not affiliated with AssetMark or any of the Strategists that participate in their program.

The Strategists will monitor the performance of the mutual funds, annuities, or separate account managers, in their model portfolios and will periodically adjust and rebalance the portfolio in accordance with their investment strategies and informing us of any changes in the model portfolio.

We will analyze the Strategists' model portfolio decisions on behalf of the client and determine if these decisions should be used to rebalance the client's portfolio based on that analysis and the client's individual goals and objectives. Clients should refer to the disclosure document (Part 2A of Form ADV or Appendix 1 of Form ADV Part 2A) of AssetMark for detail on the advisory services offered by AssetMark.

We assist the client in identifying a Strategist whose investment philosophy and model portfolio most closely match the client's state investment objectives and risk tolerances. We will meet with the client at least annually, but will be reasonably available to consult with clients on a regular basis.

Investnet Managed Account Solutions Program

As of June 01, 2012, we have added Investnet Managed Account Solutions (hereinafter, "Investnet") program to our suite of services. As of 12/31/2019 we have managed \$6,210,727 of assets on a non-discretionary basis through this program.

Through the Investnet program we offer our clients access to a range of investment management services. These services consist of two general types: model asset allocation portfolios and separately managed accounts. In the first type, Investnet will manage client accounts through a selection of proprietary model asset allocation portfolios positioned at various points along the risk/return spectrum. Each model portfolio is designed to meet a particular investment goal and will be managed based on the goals of the portfolio rather than the individual circumstances of any client account. Depending upon the service, the model portfolios may typically contain either mutual funds or exchange-traded funds ("ETFs"). In some instances Wescom Financial Services may develop, recommend and maintain customized models using the research conducted by Investnet. These model portfolio(s) will be offered as an option to certain clients as appropriate and Investnet will manage these accounts based on the goals of the customized portfolios rather than the individual circumstances of any client.

In the second type of service, Investnet offers clients access to an actively managed investment vehicle chosen from a roster of independent asset managers (each a "Sub-Manager") from a variety of investment disciplines. Unlike a mutual fund, where the funds are commingled, a separately managed account is a portfolio of individually owned securities that can be tailored to fit a client's investment preferences.

Investnet has performed due diligence on sets of Sub-Managers and makes these Sub-Managers available to clients through the Program. Depending upon the service, Investnet or Wescom Financial Services will assist the client in determining an appropriate asset allocation among the available Sub-Managers based on the investment style and asset classes employed by the Sub-Managers.

For all services, Wescom Financial Services and the client will compile pertinent financial and demographic information to develop a personal investment policy that will meet the client's goals and objectives. The client's information is then forwarded to Envestnet for review. Envestnet will analyze the information and recommend an appropriate investment strategy based on the client's needs and objectives, time horizon, risk tolerance and any other pertinent factors. Among the factors considered in designing these strategies are historical rates of risk and return for various asset classes, correlation across asset classes and risk premiums. Envestnet will then propose an overall strategy that includes asset allocation and investment portfolio recommendations for the asset classes. Wescom Financial Services will then assist the client with selecting the appropriate service based on the individual needs of the client and Envestnet's analysis and recommendations.

On an ongoing basis, we will monitor the performance of Envestnet and the Sub-Managers, as applicable. If we determine that a particular service or Sub-Manager is not providing sufficient services to the client, or is not managing the client's portfolio in a manner consistent with that client's personal investment policy, then we will suggest that the client move their account to a different service and/or Sub-Manager. Under this scenario, our firm assists the client in selecting a new service or Sub-Manager. However, any such move is solely at the discretion of the client.

At least annually, the Wescom Financial Services Advisor Representative will meet with the client to review and update, as necessary, the client's personal investment policy. However, should there be any material change in the client's personal and/or financial situation, we should be notified immediately to determine whether any review and/or revision of the client's personal investment policy is warranted.

Clients will receive a separate disclosure document (Form ADV Part 2) prepared by Envestnet describing in detail the services offered within the Program. Clients are encouraged to review the disclosure document to learn more about the particular characteristics of each of the services offered within the Program, including whether they may impose restrictions on the investment in certain securities or types of securities.

Pathway Program

The Pathway Program offers clients access to mutual funds, Exchange Traded Funds (ETFs), and Unified Managed Accounts (UMAs) through Envestnet, a registered investment advisor. Envestnet acts in the capacity of service provider to the Pathway Program and the discretionary Account Manager to the Pathway Program. As service provider, Envestnet monitors performance, provides statements, and generates research and analysis in relation to subadvisor selection, when applicable. WFS acts as an investment adviser for Pathway. For Pathway Strategists, Clients elect a third-party Portfolio Strategist available through Envestnet. For Pathway UMA, the program offers the WFS Investment Advisory Representative (IAR) the ability to construct a portfolio utilizing individual securities, Sub-Account Managers, Strategists and third-party model providers ("Model Providers") within a single account. The IAR is the Account Manager for this Program and Envestnet acts as overlay manager developing, recommending and maintain these model portfolios including the timing of the rebalancing of the model portfolios.

We manage these advisory accounts on a non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Through personal discussions with the client in which the client's goals and objectives are established, we determine which model portfolio is suitable to the client's individual circumstances. Once we determine the suitability of the portfolio, the portfolio is managed based on the portfolio's goal, rather than on each client's individual needs. Clients, nevertheless, have the opportunity to place reasonable restrictions on the types of investments to be held in their account. Clients retain individual ownership of all securities.

All of the model portfolios in this program are managed by Wescom Financial Services through the Envestnet platform. Each model portfolio will typically contain either Unified Managed Accounts (UMAs), Separately Managed Accounts (SMAs), mutual funds and/or exchange-traded funds ("ETFs").

To ensure that our initial determination of an appropriate portfolio remains suitable and that the account continues to be managed in a manner consistent with the client's financial circumstances, we will:

1. at least annually, contact each participating client to determine whether there have been any changes in the client's financial situation or investment objectives, and whether the client wishes to impose investment restrictions or modify existing restrictions;
2. be reasonably available to consult with the client; and
3. maintain client suitability information in each client's file.

Clients will receive a separate disclosure document (Form ADV Part 2) prepared by Envestnet describing in detail the services offered in conjunction with this Program. Clients are encouraged to review the disclosure document to learn more about the particular characteristics of each of the services offered within the Program, including whether they may impose restrictions on the investment in certain securities or types of securities.

All material conflicts of interest are disclosed, throughout this document, regarding Wescom Financial Services, our representatives and any employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

In opening a Pathway account, clients complete a Risk Tolerance Questionnaire to provide the IAR with the client's necessary financial data including investment goals, income requirements, time horizon and risk tolerance. The IAR then assists the client in setting appropriate investment objectives and goals. The IAR will meet with the client periodically to determine whether the investment strategy should be modified or continued and whether individual circumstances or market conditions warrant any changes in asset allocation, tax sensitivity or risk tolerance. Based on the information obtained, Envestnet will construct and manage a portfolio for the client. Envestnet periodically monitors each client's portfolio and when deemed appropriate makes changes in both asset allocation and security selection. Client shall retain the ability to modify their investment strategy at any time.

Envestnet shall have unlimited investment discretion with respect to any changes to investments in the Program Accounts, within the parameters of the selected portfolio model. This includes discretion to adjust asset allocations and replace investments in the Program Accounts. All transactions in the Program Accounts shall be initiated by Envestnet. Subject to the limitations described in the client's responses to the Profile or other appropriate suitability analysis (including any reasonable restrictions the client may place on Program Account investments) the Account Manager shall have full authority to supervise and direct the investment of the monies contributed by client to the Program Account without prior consultation except as set forth below.

There are two different Pathway Programs available:

1. Pathway Fund Strategist Portfolio (FSP) – Assets in this portfolio are limited to a) mutual funds, b) Exchange Traded Funds (ETFs) and c) a combination of mutual funds and ETFs. In this program, one or more third-party asset managers act as a Model Provider (“Strategists”).
2. Pathway UMA – Assets are segregated in individual sleeves based on the different products selected by the client. Sleeves are managed by the various third party managers selected. The collection of sleeves is then overseen by Envestnet, acting in the capacity of an Overlay Portfolio Manager (OPM). Eligible assets include general securities, including mutual funds, Exchange Traded Funds (“ETFs”), stocks, and bonds.

WFS makes available various mutual fund share classes in the Pathway Program. The mutual fund share classes include load-waived A shares, institutional class shares and advisor class shares. In some cases, a mutual fund may only offer load-waived A shares. However, another similar mutual fund may be available that offers institutional class shares or advisor class shares. In general, institutional class shares and advisor class shares are not subject to 12b-1 fees. As a result of the different expenses associated with the various mutual fund share classes, the fees may be greater in load-waived A shares versus institutional class shares or advisor class shares. For non- Pathway Direct program accounts, the Account Manager is responsible for determining which share class of a mutual fund to invest in and will follow their own share class selection practices.

Item 5 Fees and Compensation

Selection and Monitoring of Third-Party Money Managers Fees

Wescom Financial Services fee for this service does not include the independent investment adviser's fee for that entity's advisory/management services. The independent investment adviser's management fee is disclosed in the independent investment adviser's Firm Brochure or other disclosure document.

Our annual fee for the Manager Selection Program is charged as a percentage of assets under management, and can be found in the Statement of Investment Selection

Pathway Fees

Pathway clients pay an annualized fee (“Account Fee”), divided into monthly payments not to exceed 2.3% annually, based upon the type of Pathway account and the total assets under management (AUM) within the Pathway account. The Account Fee is composed of a Program Fee, which is shared between WFS, Envestnet, and Pershing, and an IAR Fee which is shared between WFS and the WFS IAR. Please refer to the Pathway account descriptions and Account Fee below for more information. In addition, the Account Fee is detailed in the Statement of Investment Selection signed by the client at account opening. There is also a statement surcharge fee of \$0.75 cents per statement which would not apply if the client opts for paperless statements.

Although clients do not pay a charge for transactions in the Pathway Program, WFS pays a fee to Pershing for transactions in a client's Program account. These transaction charges vary based on the type of transaction (e.g., mutual fund, equity, options, etc.). This charge is paid by WFS and not the IAR on the account. Any Strategists fees related to the Pathway Strategist program are separate from and in addition to the Account Fee and are assessed directly by the Strategists to a Pathway account in accordance with their respective billing terms. These fees are detailed in the fee schedule and/or Form ADV Part 2A disclosure brochure and are not determined by WFS.

The fees and charges of any Sub-Account Manager are paid to them from the Total Annual Account Fee listed in the client Statement of Investment Selection. Sub-Account Manager fees vary based on the selection of specific Sub-Account Managers and the Account assets allocated to the Sub-Account Manager. Sub-Account Manager fees range from 0.15% to 1.00% depending on the asset class, asset style managed, Program Account asset value and other factors. This variation in payments will occur between Sub-Account Managers across investment strategies as well as within an investment strategy.

If the Client's assets are allocated to the UMA Program, any change in the portfolio allocation, including a change in Sub-Account Manager, will impact the total fee paid by the Client. Any such change will affect only the compensation paid to the new Sub-Account Manager, and not any of the other parties to this Agreement. Additionally, Sub-Managers or Envestnet can elect to execute trades at broker/dealers other than Custodian for some or all of their transactions or investment styles. This is frequently referred to as "trading away" or "step out trades". Clients who select such managers or participate in the UMA are subject to any transaction charges or other charges, including commissions, mark-ups, mark-downs, or other additional trading costs that can be imposed by the executing broker/dealer. Those costs are in addition to your program fees and will be included in the net price of the security. Such costs will not be reflected as a separate charge on your trade confirmation or account statements.

- For all Pathway Fund Strategist Program accounts, , you will pay the following standard fees:
 - WFS Program Fee: Up to 0.10% of account assets
 - IAR Fee: Up to 1.0% of account assets

- For all Pathway UMA Program accounts, you will pay the following standard ranges:
 - WFS Program Fee: Up to 0.310% of account assets
 - IAR Fee: Up to 1.0% of account assets
 - Manager Fee: Up to 0.75% of account assets

The total fee that you will pay will be the combination of the WFS Program Fee, the IAR Fee, and the Manager Fee (if applicable).

The Account Fee is payable monthly in advance based on the period ending value of the prior month. For purposes of calculating Account Fees and providing performance reports, the account month begins on the day on which the account is funded. The initial Account Fee is due at the end of the calendar month following execution of the Pathway Investment Advisory Agreement and may include a prorated fee for the initial quarter. Subsequent Account Fee payments are due and assessed at the beginning of each month based on the period ending value as of the close of business on the last business day of the prior month as valued

by an independent pricing service, where available, or otherwise in good faith reflected on the client's quarterly performance report.

Other Compensation

Management personnel and other related persons of our firm are licensed as registered representatives of our broker-dealer and, acting in that capacity, they can implement transactions for our advisory clients. In so doing, these individuals will earn separate compensation in the form of commissions and/or 12b-1 fees (trail fees earned from the sale of mutual funds and/or ETFs). These commission fees represent more than half of our firm's annual revenue.

While these individuals endeavor at all times to put the interest of the clients first as part of Wescom Financial Services fiduciary duty, clients should be aware that the receipt of additional compensation itself creates a conflict of interest, and may affect the judgment of these individuals when making recommendations. Clients, however, are not under any obligation to engage these individuals when considering implementation of advisory recommendations.

General Information

Termination of the Advisory Relationship: A client will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the investment advisory agreement at any time. Upon termination, fees will be prorated to the date of termination and the unearned portion of the fee will be refunded to the client.

Mutual Fund Fees: All fees paid to Wescom Financial Services for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Additional Fees and Expenses: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

ERISA Accounts: In the event Wescom Financial Services is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under

ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Wescom Financial may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees, or conversely, investment advice about products for which our firm and/or our related persons receive commissions or 12b-1 fees, however, only when such fees are used to offset Wescom Financial Services advisory fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

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

Wescom Financial Services does not charge performance-based fees.

Item 7 Types of Clients

Wescom Financial provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High Net Worth Individuals
- Corporations or other businesses not listed above

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

Methods of Analysis

Wescom Financial Services third-party advisers may use the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis. We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

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.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- we believe the securities to be currently undervalued, and/or
- we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Short-term purchases. When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.

Risk of Loss

Securities investments, including mutual funds are not guaranteed and you may lose money on your investments. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

As disclosed above in Item 4, Wescom Financial Services is also a FINRA-member broker dealer, and many of our management persons and other employees are registered representatives of Wescom Financial Services. Please see the disclosure in Item 5 for information regarding this relationship and the applicable conflicts of interest.

Further, Wescom Financial Services is a wholly owned subsidiary of Wescom Central Credit Union. Wescom Central Credit Union is a member-owned state chartered credit union. Through Wescom Financial Services is under common ownership and control with the following other financial institutions and non-financial businesses (referred to collectively with WCCU as the "Related Companies"):

- Wescom Financial Services, LLC
- Wescom Insurance Services, LLC
- Wescom Resources Group, LLC
- CUSO Mortgage Inc.

Where appropriate, Wescom Financial Services and its employees will recommend the various investment-related and non-investment services of the Related Companies to its advisory clients. The Related Companies and their employees may also recommend the investment advisory services of Wescom Financial Services to their customers. The services provided by the Related Companies are separate and

distinct from the advisory services of Wescom Financial Services, and are provided for separate and additional compensation.

Clients should be aware that the recommendation of the services of the Related Companies by Wescom Financial Services and its management persons or employees creates a conflict of interest that may impair the objectivity of Wescom Financial Services and these individuals when making advisory recommendations. Wescom Financial Services endeavors at all times to put the interest of its clients first as part of its fiduciary duty as a registered investment adviser and takes the following steps to address this conflict:

- Wescom Financial Services discloses to clients the existence of all material conflicts of interest, including, where applicable, the potential for Wescom Financial Services and its employees to earn compensation from advisory clients in addition to Wescom Financial Services advisory fees;
- Wescom Financial Services discloses to clients that they are not obligated to purchase recommended investment products or other services from Wescom Financial Services employees or Related Companies;
- Wescom Financial Services collects, maintains and documents accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Wescom Financial Services management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances; and
- Wescom Financial Services educates its employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

Wescom Financial Services is aware of the special considerations required under Rule 206(4)-3 of the Investment Advisers Act of 1940 and similar state rules regarding the payment and receipt of solicitation fees. As such, all appropriate disclosure shall be made and all applicable State and Federal laws will be observed.

Clients should be aware that the receipt of this referral fee by Wescom Financial Services creates a conflict of interest that may impair the objectivity of Wescom Financial Services and its employees when making advisory recommendations. Wescom Financial Services endeavors at all times to put the interest of its clients first as part of its fiduciary duty as a registered investment adviser and takes the following steps to address this conflict:

- Wescom Financial Services discloses to clients the existence of all material conflicts of interest, including the potential for Wescom Financial Services to earn compensation from the referral of clients to other registered investment advisers;
- Wescom Financial Services discloses to the client the compensation it receives in exchange for the client's referral to the selected investment adviser;
- Wescom Financial Services collects, maintains and documents accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Wescom Financial Services management conducts reviews of each client account to verify that all recommendations made to a client by its employees are suitable to the client's needs and circumstances;

- Wescom Financial Services conducts initial and periodic due diligence on the selected investment advisers to establish that the advisers are suitable to recommend to its clients; and
- Wescom Financial Services educates its employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Wescom Financial Services and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Our code also provides for oversight, enforcement and recordkeeping provisions.

Wescom Financial Services Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to operations@wescomfinancial.com, or by calling us at (888) 879-0558, extension 5104.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees 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.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts.

As disclosed in the preceding section of this Brochure (Item 10), related persons of our firm are separately registered as securities representatives of a broker-dealer. Please refer to Item 10 for a detailed explanation of these relationships and important conflict of interest disclosures.

Item 12 Brokerage Practices

Wescom Financial Services does not have any soft-dollar arrangements and does not receive any soft-dollar benefits.

As our firm does not have the discretionary authority to determine the broker-dealer to be used or the commission rates to be paid, clients must direct Wescom Financial Services as to the broker-dealer to be used.

As a matter of policy and practice, Wescom Financial Services does not generally block client trades and, therefore, we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

Item 13 Review of Accounts

Reviews: Reviews by the third-party managers and program sponsors will be specifically outlined in the advisory agreement(s) signed between the client and third-party adviser and sponsor.

Wescom Financial Services Advisor Representatives will monitor the performance of the third-party advisers selected to manage client's portfolios within the programs and formally review these accounts at least annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: The advisor at a minimum annually.

Reports: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer or custodian, WCCU provides monthly reports summarizing account performance, balances and holdings.

Item 14 Client Referrals and Other Compensation

It is Wescom Financial Services policy not to engage solicitors or to pay related or non-related persons for referring potential clients to our firm.

It is Wescom Financial Services policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

Item 15 Custody

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm receives its fee from the third-party advisers and sponsors of the programs. Wescom does not deduct any fees for its services separately and is not responsible of calculating the advisory fees paid in connection with these programs.

Our firm does not have actual or constructive custody of client accounts.

Item 16 Investment Discretion

As previously disclosed in Item 4 of this brochure, our firm does not provide discretionary asset management services.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We do not offer any consulting assistance regarding proxy issues to clients.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Wescom Financial Services has no additional financial circumstances to report.

Wescom Financial Services has not been the subject of a bankruptcy petition at any time during the past ten years.