

**Form ADV Part 2A Appendix Wrap Fee Brochure**

**Item 1 – Cover Page**

**WFG Capital Advisors, LLC**

**DBA**



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This Wrap Fee Brochure provides information about the qualifications and business practices of Williams Financial Group ("WFG"). If you have any questions about the contents of this Wrap Fee Brochure, please contact us at 1-251-473-2120 or [information@wfgplanning.com](mailto:information@wfgplanning.com). The information in this Wrap Fee Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

WFG is registered as an investment adviser with the SEC under the U.S. Investment Advisers Act of 1940, as amended (the "Advisers Act"). Registration does not imply a certain level of skill or training. Additional information about WFG also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) CRD# 310008.

## Item 2 - Material Changes

WFG will provide you with a summary of any material changes to the Brochure within 120 days of the close of our fiscal year. WFG may disclose material changes at any point in time as it deems necessary. WFG will provide updated brochures and disclosures free of charge. Presently, requests for WFG's brochures may be made by contacting Matt Williams at 251-473-2120 or [matt@WFGPlanning.com](mailto:matt@WFGPlanning.com).

WFG has no material changes to report since the last annual updating amendment.

Additional information about WFG is available on the SEC website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information on any persons affiliated with WFG who are registered, or required to be registered, as investment adviser representatives of WFG.

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## Item 4 – Services, Fees and Compensation

### **General Information**

WFG Capital Advisors, LLC was formed in 2020 and provides innovative investment management services that include customized investment portfolio management, sub-advisory services, financial planning and financial consulting.

Matt Williams and Billy Williams are each 50% owners. Please see Brochure Supplements, at the end of this brochure for more information on the Managing Principals of WFG.

### **Asset Under Management**

WFG has \$187,412,739 in discretionary and \$8,873,247 in non-discretionary assets under management for a total of \$196,285,986.

### **Types of Advisory Services**

Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Portfolio Management Services
- Selection of Sub-advisor(s)
- Financial Planning Services
- Consulting Services

*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. As used in this brochure, the words "we", "our" and "us" refer to WFG Capital Advisors, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. The use of these terms is not intended to imply that there is more than one individual associated with this firm.*

### **Portfolio Management Services**

We offer discretionary and non-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 will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our portfolio management services, we may customize an investment portfolio for you according to your risk tolerance and investing objectives. We may also invest your assets using a predefined strategy, or we may invest your assets according to one or more model portfolios developed by our firm. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis, and rebalance the portfolio as changes in market conditions and your financial situation dictate. If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. 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. We may pay a portion of our advisory fee to the sub-adviser(s) we use; however, you will not pay our firm a higher advisory fee as a result of any sub-advisory relationships.

### **Selection of Sub-adviser(s)**

As part of our investment advisory services, we may recommend that you use the services of a sub-adviser to manage all, or a portion of, your investment portfolio. After gathering information about your financial situation and objectives, we will recommend that you engage a specific sub-adviser or investment program. WFG evaluates a variety of information about each sub-adviser, which may include public disclosure documents, materials supplied by the sub-adviser themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the sub-adviser's investment strategies, past performance and risk results in relation to its clients' individual portfolio allocations and risk exposure. WFG also takes into consideration each independent manager's management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors. WFG continues to provide services relative to the discretionary selection of the sub-adviser. On an ongoing basis, the Firm monitors the performance of those accounts being managed by each sub-adviser. WFG seeks to ensure the

sub-adviser's strategies and target allocations remain aligned with its clients' investment objectives and overall best interests.

### **Financial Planning**

We can provide you with a Financial Plan that will include a review of your financial circumstances, financial goals and a written report based on an evaluation and analysis of information you provide. This information normally would cover a review of your personal financial situation, including but not limited to present and anticipated assets, liabilities, cash flow, financial goals, objectives, risk tolerance and time horizon. We may also create additional analyses and work with and advise you as to the rearrangement of cash flow in order to fund certain long-term objectives such as buying a house, planning for college, retirement, etc. The plan developed for you will usually include recommendations for a course of activity or specific actions to be taken by you. For example, recommendations may be made that you obtain insurance or revise existing coverage, establish an individual retirement account, increase or decrease funds held in savings accounts or invest funds in securities. We may refer you to an accountant or attorney for development of tax or estate plans. We do not render legal, tax or accounting advice or prepare any legal documents for you. Your personal attorney will be solely responsible for providing legal advice, legal opinions, legal determinations and legal documents. Your personal tax adviser or accountant will be solely responsible for any tax or accounting services provided to you. Implementation of financial plan recommendations is entirely at the client's discretion. Should you decide to use our money management services, there will be a separate agreement.

### **Services Limited to Specific Types of Investments**

WFG generally limits its investment advice to exchange traded funds ("ETFs"), stocks, bonds, options, mutual funds, and other public and private securities. WFG may use other securities as well to help diversify a portfolio when applicable.

### **Consulting Services**

In addition to financial planning, we can provide you with consultation on various financial topics to address your specific needs and objectives. We will analyze your current financial situation and investment goals and present strategies and recommendations to help you attain those goals. Consulting services, while similar to traditional financial planning, provide you with several distinct services which are listed below:

- Retirement Planning
- Business Succession Planning
- Charitable Planning
- Special Needs Planning
- Estate Planning
- Cash Flow Analysis
- Divorce Transition Planning
- Education Funding Planning

Consulting services, which are offered on a non-discretionary basis, can be narrow in scope and may not take into consideration all areas of a client's financial situation. Consulting services provided should not be construed as investment advice.

### **Client Tailored Services and Client Imposed Restrictions**

WFG offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk

tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

**Disclosures related to investment management and financial planning Insurance services:**

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. Each is appointed directly with one or more insurance companies for the placement of life insurance, fixed deferred annuities, fixed immediate annuities, disability insurance, and/or long-term care insurance products. WFG itself is not an insurance agency or broker. The insurance company pays WFG's employees who sell insurance services to a client a commission for the transaction. This compensation is separate and distinct from advisory fees paid to WFG for services as described in this brochure. Insurance commissions are not used to offset advisory fees as described under Item 5, below. Note that acting in a separate capacity, as an insurance agent is a conflict of interest if you decide to use one of our employees to implement financial plan recommendations.

**Fees and Compensation**

**General Fee Information**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. Fees paid to WFG are inclusive of all custodial and transaction costs paid to the client's custodian, brokers or other third- party consultants.

**Additional Fees and Expenses**

Fees paid to WFG are separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The client should review all fees charged by funds, brokers, WFG and others to fully understand the total amount of fees paid by the client for investment and financial- related services.

**Termination - Refund of Unearned Fees**

Either WFG or the client may terminate their Investment Advisory Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client, and any fees due to WFG from the client will be invoiced or deducted from the client's account prior to termination.

**Portfolio Management Fees**

The standard, maximum annual fee schedule, based on a percentage of assets under management, is as follows:

Assets Under Management	Annual Advisory Fee
\$0 - \$250,000	1.25%
\$250,001 - \$750,000	1.1%
\$750,001 - \$1,000,000	1%
\$1,000,001 and above	Negotiable

The Management Fee of Client assets shall be calculated and billed at the stated rates monthly in arrears as indicated in Schedule A to the Investment Management Agreement, based upon the total market value of the assets as to which investment advisory services are being rendered on the Effective Date of the

Investment Management Agreement and thereafter on the beginning or last trading day of each month.

WFG may, at its discretion, make exceptions to its fee arrangements or negotiate special fee arrangements where WFG deems it appropriate under the circumstances.

With client authorization and unless other arrangements are made, fees are normally debited directly from client account(s).

### **Financial Planning/Consulting Services**

Hourly fees range from \$150-\$350 per hour, and fixed fee services range from \$1,500 to \$50,000. These are negotiated fees based on the scope and complexity of the services provided. Clients may be invoiced directly, monthly in arrears for financial planning and/or consulting services charged on an hourly or flat fee basis.

## **Item 5 – Account Requirements and Types of Clients**

WFG serves individuals, small businesses, trusts, and estates. The minimum portfolio size is \$250,000 under certain circumstances and in its sole discretion, WFG may negotiate such minimum.

## **Item 6 – Portfolio Manager Selection and Evaluation**

WFG acts as the portfolio manager for its Wrap Fee Program accounts. WFG also offers non-wrap advisory services and may have a conflict of interest in recommending one over the other. Prospective and existing clients are advised to refer to WFG's Form ADV Part 3 for more information relating to the nature of the client relationship, including all fees and expenses.

### **Advisory Business**

WFG is a Registered Investment Adviser based in Mobile, Alabama and incorporated under the laws of the State of Alabama. WFG is registered with the Securities and Exchange Commission and is subject to its rules and regulations. Founded in 2020, WFG provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. WFG also provides financial planning consulting services including, but not limited to, risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation.

WFG provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with WFG. Managed Accounts are available to individuals, high net worth individuals and charitable organizations.

### **Asset Management**

WFG provides discretionary investment advisory services to some of its clients through various managed account programs. WFG will assist clients in determining the suitability of the Managed Account Programs for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. WFG and its IAR, as appropriate, will be

responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections
- Providing Wrap Fee Brochure (this document)

### **Performance-Based Fees and Side By Side Management**

WFG does not charge 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 capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

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

#### **Methods of Analysis**

WFG primarily employs equities and ETFs to implement its strategies. Bonds, options, and mutual funds may also be used where WFG feels appropriate.

ETFs and mutual funds are generally evaluated and selected based on a variety of factors, including, as applicable and without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

In selecting individual stocks, mutual funds, ETFs, and other securities for an account, WFG generally applies a combination of technical and fundamental analysis including, without limitation, the following factors:

- Financial strength ratios;
- Momentum Characteristics;
- Absolute Price Levels;
- Price-to-earnings ratios;
- Dividend yields;
- Growth rate-to-price earnings ratios; and
- Price trends
- Value Characteristics
- Broad Market Valuations

Both long-term and short-term investments in various combinations over time may be employed for a given client, depending upon the client's individual circumstances and/or market conditions.

**Long Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities’ short-term price fluctuations.

### **Investment Philosophy and Approach**

WFG’s primary objective is to participate in the market’s upside while attempting to avoid major market drawdowns. Devastating drawdowns in securities markets happen more often than anyone would like. The emotional effect of staying invested during those periods can be intolerable for some investors and may lead to irrational decisions driven by fear. For that reason, WFG incorporates a systematic approach using technical and fundamental indicators in an attempt to avoid severe market pull backs and reduce human error in portfolios. Potentially avoiding these situations is desirable and why WFG developed its investment methodology.

### **Risk of Loss**

All investment portfolios are subject to risks that clients should be prepared to bear. Accordingly, there can be no assurance that client investment portfolios will be able to fully meet their investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that client investment portfolios face.

*Management Risks.* While WFG manages client investment portfolios based on WFG’s experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that WFG allocates client assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that WFG’s specific investment choices could underperform their relevant indexes.

*Risks of Investments in Mutual Funds, ETFs and Other Investment Pools.* As described above, WFG may invest client portfolios in mutual funds, ETFs and other investment pools (“pooled investment funds”). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds’ success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

*Inverse Correlation Risk.* Inverse funds (including ETFs and ETNs) should lose value as the index or security tracked by such fund’s benchmark increases in value; a result that is the opposite from traditional funds. Successful use of inverse funds requires that the adviser correctly predict short term market movements. If a client invests in an inverse fund and markets rise, the client could lose money. Inverse funds may also employ leverage such that their returns are more than one times that of their benchmark.

*Equity Market Risks.* WFG will generally invest portions of client assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods



(e.g., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

*Fixed Income Risks.* WFG may invest portions of client assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

*Options Risk.* A small investment in options could have a potentially large impact on an investor's performance. The use of options involves risks different from, or possibly greater than, the risks associated with investing directly in the underlying assets. Derivatives can be highly volatile, illiquid and difficult to value, and there is the risk that a hedging technique will fail if changes in the value of a derivative held by an investor do not correlate with the securities being hedged.

*Foreign Securities Risks.* WFG may invest portions of client assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of client investment portfolios, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

### **Voting Client Securities**

As a policy and in accordance with WFG's client agreement, WFG does not vote proxies related to securities held in client accounts. The custodian of the account will normally provide proxy materials directly to the client. Clients may have proxy materials forwarded to WFG by indicating so on the Investment Advisory Agreement. This is only as a convenience to the Client, as Clients cannot "opt out" of receiving proxy materials from the custodian, however WFG will not vote them. Clients may contact WFG with questions relating to proxy procedures and proposals; however, WFG generally does not research particular proxy proposals.

## **Item 7 – Client Information Provided to Portfolio Managers**

WFG may directly provide the portfolio management services for the Wrap Fee Program accounts. As such, WFG receives all information provided by the Client through a formal Needs Analysis and consultation with the Client. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

## **Item 8 – Client Contact with Portfolio Managers**

There are no restrictions placed on WFG's clients' ability to contact and consult with their portfolio manager(s).

## **Item 9 – Additional Information**

### **Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of WFG or the integrity of WFG's management.

Billy Williams has one disclosure on record regarding an incident settled in October of 2008. A former client alleged to have received bad investment advice regarding a fund in their portfolio.

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

WFG may have Investment Advisor Representatives that are also independently licensed insurance agents or Registered Representatives of Broker- Dealer firms. From time to time, they may offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. WFG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of WFG in their capacity as insurance agent.

WFG does not receive payment from any other company for the referral of business.

### **Code of Ethics and Personal Trading**

WFG has adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. WFG's Code has several goals. First, the Code is designed to assist WFG in complying with applicable laws and regulations governing its investment advisory business. Under the Investment Advisers Act of 1940, WFG owes fiduciary duties to its clients. Pursuant to these fiduciary duties, the Code requires persons associated with WFG (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for WFG's associated persons. Under the Code's Professional Standards, WFG expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, WFG associated persons are not to take inappropriate advantage of their positions in relation to WFG clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, WFG's associated persons may invest in the same securities recommended to clients. Under its Code, WFG has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

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

WFG has adopted procedures to protect client interests when its associated persons invest in the same securities as those selected for or recommended to clients. In the event of any identified potential trading conflicts of interest, WFG's goal is to place client interests first.

Consistent with the foregoing, WFG maintains policies regarding participation in initial public offerings

("IPOs") and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If an WFG associated person wishes to participate in an IPO or invest in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Finally, if associated persons trade with client accounts (i.e., in a bundled or aggregated trade), and the trade is not filled in its entirety, the associated person's shares will be removed from the block, and the balance of shares will be allocated among client accounts in accordance with WFG's written policy.

### **Review of Accounts**

Managed portfolios are reviewed at least annually but may be reviewed more often if requested by the client, upon receipt of information material to the management of the portfolio, or at any time such review is deemed necessary or advisable by WFG. These factors generally include but are not limited to, the following: change in general client circumstances (marriage, divorce, retirement); or economic, political or market conditions. WFG's Members review all accounts.

For those clients to whom WFG provides separate financial planning, reviews are conducted on an as needed or agreed upon basis.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. Additional reports are available at the request of the client.

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

WFG receives an economic benefit from the Custodians in the form of support products and services it makes available to WFG name and other independent investment advisors whose clients maintain accounts at the Custodians. These products and services, how they benefit our firm, and the related conflicts of interest are described in below in **(Brokerage Practices)**. The availability of the Custodians' products and services to WFG is based solely on our participation in the Programs, and not on the provision of any particular investment advice. Neither the Custodians nor any other party is paid to refer clients to WFG.

WFG does not receive payment from any other company for the referral of business.

### **Financial Information**

WFG does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore has no disclosure required for this item.

## **Item 10 - Privacy Notice**

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 non-public 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 transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.