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CRD No. 104976

Wrap Fee Program Brochure
(Part 2A of SEC Form ADV)

Revision Date: February 26, 2021

This Wrap Fee Program Brochure provides information about the qualifications and business practices of WCM, Inc. If you have any questions about the contents of this brochure, please contact us at (612) 341-2218 and/or clientservices@wcmi-email.com. 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.

WCM, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. Oral and written communications from an adviser provide you with information to assist you in determining whether to hire or retain such adviser. Additional information about WCM, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

We may update this Brochure at any time but are required to promptly provide clients with a copy whenever any information in the Brochure becomes materially inaccurate.

The material changes made to this brochure since the last Wrap Fee Program Brochure and Supplements dated February 29, 2020 are as follows:

- Item 4: The owners of WCM Inc. are Brian Kertz and Linda Wilke. Rose Hanson is no longer an owner of WCM Inc. effective February 26, 2021.
- Appendix B, Item 2: Brian Kertz is named the Chief Compliance Officer (CCO) effective February 26, 2021 after the previous CCO, Rose Hanson, redeemed her shares of ownership to WCM Inc.
- Appendix B, Item 6: Linda Wilke will supervise Brian Kertz' investment advisory activities.
- Appendix D has been removed. Rose Hanson is no longer an officer of WCM Inc.

To obtain a copy of our Brochure and Brochure Supplements contact Brian Kertz or Linda Wilke at 612-341-2218 or clientservices@wcmi-email.com.

Additional information about WCM, Inc. is also available on the SEC's website www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with WCM, Inc. who are registered, or are required to be registered, as investment adviser representatives of WCM, Inc.

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Item 4 – Services, Fees and Compensation

Description of the Advisory Firm

WCM, Inc. d/b/a WCMI is an investment advisory firm registered with the Securities and Exchange Commission (“SEC”), the State of Minnesota and certain other states. The firm was founded in 1984 and the principal owners are Brian Kertz and Linda Wilke.

WCMI conducts securities transactions for clients through Fidelity Brokerage Services LLC (“FBS”). Custody of client assets and execution of securities transactions are provided by an affiliate of FBS, National Financial Services LLC (“NFS”) (collectively “Fidelity”), or another custodian if a client so elects to custody their assets elsewhere.

Types of Advisory Services

WCMI offers investment advisory services as a Wrap Fee Program. WCMI manages client accounts for an all-inclusive fee that includes portfolio management services, custodial services and the execution of securities transactions. Under this program, WCMI provides continuous personal service to sizeable investors with individualized, ongoing management of their assets. Management is on a discretionary basis; selection of securities and timing of transactions are completed without prior approval by clients.

Fee Schedule

Management fees are billed quarterly based on the fair market value at the end of the previous quarter and are payable in advance. Clients may elect to be billed directly for fees or authorize WCMI to debit fees from their account(s).

Annual fees for managed accounts are as follows:

2.00% of the first	\$ 500,000
1.50% on the next	\$ 500,000
1.00% of the amount over	\$ 1,000,000

These terms are negotiable, generally for multi-million-dollar accounts. Management fees may be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals).

Either WCMI or the client shall have the right, on giving a 10-day notice to the other, to terminate this agreement. In the event of such termination, all fees due and accrued as of the end of any particular quarter or interim period shall be paid to WCMI at the time of termination or refunded by WCMI if paid in advance.

Fees that are collected in advance will be refunded based on the prorated amount of work completed (after the 10-day notice period has expired) and the total days during the billing period.

Clients may pay lower fees for comparable services from other sources and may pay more or less for WCMI's Wrap Fee Program than purchasing these services separately.

Additional Fees or Expenses

In addition to the asset-based fees, clients may pay additional fees or charges which may include, but are not limited to, electronic fund and wire transfer fees; outgoing ACAT transfer fees; charges imposed by custodians, such as annual fees on non-managed securities; SEC fees on securities trades; other charges mandated by law; and certain fees in connection with the establishment, administration or termination of retirement, profit sharing plans or trust accounts.

Client cash balances are invested in money market mutual funds and/or an interest-bearing cash position. Most clients also own some mutual funds and/or exchange-traded funds ("ETFs"), which may charge and deduct operating expenses and management fees from assets. Such charges are described in detail in the prospectus. Our managed account clients incur such fees to the extent their assets are invested in mutual funds or ETFs. Some mutual funds also levy front-end loads (sales charges). Some mutual funds may charge a back-end load if liquidated within a short period of time after purchase. Such fees may be passed on to the client if the liquidation is at the direction of the client.

WCMI does not mark-up prices of securities sold to clients. Clients wishing to self-direct trades in their account pay the direct costs charged by our custodian and such assets are excluded from the fee basis calculation.

Compensation for Wrap Fee Program

WCMI's sole business is to provide managed account services to its wrap fee program clients. Therefore, its sole source of revenue is from its wrap fee program.

Item 5 – Account Requirements and Types of Clients

WCMI's minimum account size is \$500,000, which may be waived for existing clients, for referrals from existing clients or at the portfolio manager's discretion. WCMI may aggregate portfolios of a client's family members to meet the minimum portfolio size.

WCMI provides portfolio management services for a broad range of investors, including but not limited to, individuals, business owners, corporations, their executives and/or employees, trust accounts, retirement accounts, pension and profit-sharing plans and other U.S. institutions.

Item 6 – Portfolio Manager Selection and Evaluation

Advisory Business

WCMI does not utilize outside advisers or third-party managers. All assets are managed by Margaret Jones and Brian Kertz.

Client Tailored Services

Portfolio Review. The account management process begins with in-depth interviews and review of the client's current financial status focusing primarily on income, net worth, risk tolerance, investment time horizon, investment objectives and tax status.

Asset Allocation Strategy Formulation. A major asset allocation strategy is mapped out integrating the client's objectives with the firm's assessment of current market conditions. Recommended percentages for allocation among cash, bonds, and stocks are made. Plans for deployment of the client's existing assets into these specific categories are developed and implemented.

Investment Strategy Formulation. Specific investment recommendations depend on the client's individual circumstances, including:

- Diversification by type and quantity of investment
- Needs for liquidity
- Optimizing return by balancing risk and reward
- Tax impact of investments, with economic benefit of key importance
- Current needs for income and capital preservation
- Protection against inflation
- Desire for long-term growth
- Risk tolerance
- Protection strategy for down markets.

Monitoring and review. Managed Accounts are continually reviewed in terms of performance of existing investments as well as for emerging investment opportunities. WCMI maintains close contact with clients focusing on their individual needs and objectives. WCMI generates quarterly reports showing current investment assets relative to cost basis, percentage allocation and performance relative to market indices. Clients also receive confirmations of all transactions and at least quarterly statements from their custodian.

Performance-Based Fees and Side-By-Side Management. WCMI does not accept any performance-based fees (fees based on a share of capital gains and/or capital appreciation, either realized or unrealized).

Methods of Analysis and Investment Strategies

WCMI can invest in most types of securities, but does not trade futures, options or other derivatives. Primary holdings are in stocks, bonds, and mutual funds, with the majority of assets in stocks. Stocks and bonds are chosen in-house, emphasizing fundamental, bottom-up research. Mutual funds are used to enhance portfolio diversification, to invest in areas such as international markets that are not easily accessible to individual investors, and to place client funds with top-rated managers with varying styles. General advice can be provided on virtually all types of securities, including publicly traded debt and equity, investment company shares (mutual funds) and limited partnerships.

WCMI uses fundamental and technical analysis in selecting investments for clients. Key factors include general economic, financial and industry trends. This information is gathered from business, financial and investment periodicals, objective analytical services, and discussions with broker-dealers and investment product wholesalers. Research includes determining sources and risks of the cash flows from the investment; capability, past performance, and integrity of management; and fit of investment objectives with those of the client. Particular emphasis is placed on the use of leverage, relative P/E ratio, position in industry and industry outlook when evaluating a specific security. Sales growth, market growth, depth of management, gross margins and market capitalization are also assessed. Prospectuses, offering documents, annual reports, analysis by rating services, and sales material from wholesalers are reviewed for specific investments. Moody's, Standard and Poor's, and other bond ratings are reviewed. The analysis of volatility, volume and charts is especially employed when decisions to buy or sell are considered.

For mutual funds, past performance is reviewed and rating service rankings are employed. Fund portfolios are heavily scrutinized. Internal rates of return are compared to similar alternatives and overall market performance. Mutual fund performance is monitored via rankings by magazines, Lipper Analytical Services, Morningstar, Value Line and other fund rating services.

Long-term purchases are generally recommended, but some shorter-term trading is used depending on market conditions and specific stocks.

Investing in securities involves risk of loss that clients should be prepared to bear.

Material Risks

WCMI's investment strategy seeks to limit risk through diversification in securities while realizing a satisfactory return. Frequent trading, when done, can affect investment performance, particularly through taxes.

Risks of Specific Securities Utilized

All investments contain risk and may lose value. Investing in the stock or bond market is subject to certain risks including market, economic, interest rate, issuer, credit, and inflation risk. The credit quality of a particular security or group of securities does not ensure the stability or safety of the overall portfolio.

There is no guarantee that WCMI's investment strategy will work under all market conditions and each investor should evaluate their ability to invest for the long-term, especially during periods of downturn in the markets. Diversification does not ensure against loss. Past performance is not a guarantee of future returns.

Voting Client Securities

WCMI does not vote proxies on behalf of advisory clients. However, WCMI may, at a client's request, provide advice regarding voting of proxies.

Aggregating (Block) Trading for Multiple Client Accounts

All client accounts are traded separately, but if buying or selling a position across many accounts, WCMI will enter a block trade and each client will then receive the overall average price. If a limit order is entered for the total number of shares and partial fill(s) are received, WCMI will allocate the shares to the accounts on a rotating basis, keeping required documentation on the allocation process.

Item 7 – Client Information Provided to Portfolio Managers

WCMI will collect and maintain client information as part of the new account process. The data collected is in addition to the information completed on the custodian's new account application and includes the client's stated goals and objectives, risk tolerance, time horizon, financial horizon, and other various suitability factors. WCMI regularly reminds clients to report any changes to their investment objectives and risk tolerance.

WCMI reviews the client's financial status and investment objectives on an ongoing basis and makes any adjustments to the client's portfolio as deemed necessary.

Item 8 – Client Contact with Portfolio Managers

Client contact with Margaret Jones, Brian Kertz and WCMI is not restricted. Clients are encouraged to contact Margaret Jones or Brian Kertz with any portfolio management questions or to contact WCMI with any service requests or questions they may have.

Item 9 – Additional Information

Disciplinary Information

Neither WCMI nor its management persons have ever been involved in a legal or disciplinary event that would be considered material to a client's or prospective client's evaluation of our advisory business or the integrity of its management.

Other Financial Industry Activities and Affiliations

Neither WCMI nor its management persons are registered as a broker-dealer, broker-dealer representatives, or as a Futures Commission Merchant, Commodity Pool Operator or a Commodity Trading Advisor.

Code of Ethics

WCMI has adopted a Code of Ethics Policy for all employees of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics Policy includes provisions relating to the confidentiality of client information; provisions stating that our firm and our advisors give advice that is in a client's (or potential client's) best interest and charge no more than a reasonable compensation; a prohibition on insider trading and rumor mongering; restrictions on the acceptance of significant gifts; and timing limitations on personal securities trading, among other things.

Each WCMI employee shall comply with all applicable federal and state laws and all rules and regulations of any governmental agency or self-regulatory organization governing the actions of WCMI, its officers and employees. A copy of WCMI's Code of Ethics Policy is mailed to clients annually and is available upon request.

Recommendations Involving Material Financial Interests

WCMI does not recommend to clients, nor buys or sells for client accounts, securities in which a principal of WCMI has a material financial interest. If at any time a principal of

WCMI wishes to buy or sell securities in a client's account where they have a material financial interest, this relationship shall be disclosed in advance in writing to clients.

Investing Personal Money in the Same Securities as Clients

WCMI management encourages employees to invest in the securities it recommends to clients as long as their orders are entered after discretionary clients' orders. WCMI's trading volume is not large enough to cause movement in securities' prices.

Review of Accounts

WCMI's Investment Strategists and Money Managers, Margaret Jones and Brian Kertz, continuously monitor investments under management. Ms. Jones and Mr. Kertz both monitor clients' holdings on a daily basis and do a formal account review monthly.

In addition, all trade activity is reviewed daily by a supervisory principal, with a cumulative account activity review done weekly. Monthly review and reconciliation of portfolio holdings against custodian's statements are completed by Brian Kertz.

Managed accounts are also reviewed at least quarterly by Ms. Jones and Mr. Kertz with communications to monitor changes in client financial status or objectives and refine investment strategies and formulate plans for the coming months.

Non-periodic reviews may be triggered by market, economic or political events, or by changes in a client's financial situation, such as retirement, termination of employment, inheritance or changes in current income needs.

Content and Frequency of Reports Provided to Clients

WCMI provides clients with written reports on a quarterly basis that includes (i) an account performance report which is calculated by a professional investment portfolio software program, and (ii) an account appraisal report with a summary of assets in the account with the price of all securities as of the previous quarter end. Such reports also reflect the current investment assets relative to cost basis (or end of day value on date of arrival when purchased elsewhere and retained in account), percentage allocation and performance relative to market indices.

Clients also receive confirmations of all transactions and monthly statements from their custodian when accounts have had activity during that month, otherwise quarterly. Clients should carefully review these statements for accuracy. WCMI also urges clients to compare their quarterly appraisal report provided by WCMI to their custodian's account statement for accuracy.

Client Referrals and Other Compensation

WCMI does not receive any compensation, including sales awards or other prizes, either directly or indirectly, from any third party for advice rendered to WCMI clients. WCMI does not compensate, either directly or indirectly, any person who is not an employee for client referrals.

WCMI does not have any soft dollar arrangements with other firms that could cause conflicts of interest.

Financial Information

WCMI does not receive fees of more than \$500 six months or more in advance and is not required to provide a balance sheet or other financial information to clients. WCMI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has never been the subject of a bankruptcy proceeding.

Investment Discretion and Custody

WCMI accepts discretionary authority to manage securities accounts on behalf of clients. Clients may impose restrictions on investing in certain securities or types of securities. However, if the restrictions prevent WCMI from properly servicing the client account or if the restrictions would require WCMI to deviate from its standard management services, WCMI reserves the right to terminate the relationship. Clients sign a Power of Attorney form giving WCMI discretionary authority to make the following determinations without obtaining further consent from the client:

1. which securities are to be bought and sold;
2. size of transactions;
3. when securities are to be bought and sold;
4. commission rates for transactions. (No commissions are charged on regular Managed Account transactions).

WCMI does not maintain custody of clients' assets except to the extent that it has limited authority to disburse funds to one or more third parties from a client's account held at Fidelity at the client's direction. Such clients have a signed Standing Letter of Instruction ("SLOI") on file with Fidelity authorizing the money movement. WCMI has no authority, or ability, to amend such SLOI.

WCMI recommends that clients use Fidelity for custody and brokerage services. Although WCMI recommends that clients establish this relationship, clients may, if they wish, choose another broker-dealer or custodian. This may cause the client to receive less favorable execution of transactions and to pay higher fees than if they use Fidelity.

In evaluating whether to recommend that clients custody their assets at Fidelity, WCMI

considers a wide range of factors, including:

- Combination of transaction execution services and asset custody services;
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.);
- Available investment products, i.e. stocks, bonds, mutual funds, exchange-traded funds (“ETFs”), etc.;
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services; and,
- Reputation, financial strength, security and stability.

Fidelity also makes available to WCMI other products and services that benefits us but may not directly benefit our clients or their accounts. These products and services assist us in managing and administering our clients’ accounts. They include, but are not limited to, investment research; marketing consulting and support; and consulting on technology, compliance, legal and business needs. Fidelity may also discount or waive its fees for some of these services or pay all or part of a third-party’s fees. The availability of these services from Fidelity benefits us because we do not have to purchase them. This is a potential conflict of interest. We believe, however, that our selection of Fidelity as custodian and broker is in the best interests of our clients.

WCMI is independently owned and operated and is not affiliated with Fidelity Investments, Inc.

Appendix A

Margaret Florence Jones
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(612) 341-2218

CRD No. 1433814

Wrap Fee Program Brochure Supplement
(Part 2B of SEC Form ADV)

Revision Date: February 26, 2021

This Brochure Supplement provides information about Margaret Florence Jones that supplements the WCMi Brochure. You should have received a copy of that Brochure. Please contact us at (612) 341-2218 or email us at clientservices@wcmi-email.com if you did not receive WCMi's Brochure or if you have any questions about the content of this Supplement.

Additional information about Margaret Florence Jones is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

MARGARET FLORENCE JONES is an Investment Strategist and Money Manager for WCM, Inc. (d/b/a WCMI). Margaret previously held the position of CEO until 2014, when she sold the company to the three key individuals of the firm. Margaret has been the investment strategist and money manager for the company since joining the firm in 1990.

Margaret's professional experience includes over thirty years in the investment industry, including four years as a financial consultant with Merrill Lynch, Pierce, Fenner & Smith, Inc. Her professional background also includes experience as a business consultant with Keith-Stevens Inc. developing and implementing strategic and tactical plans for Fortune 500 firms; eight years as executive vice president and co-owner of Professional Travel Consultants Inc. (d/b/a PTC Inc.), an international marketing firm; and an international negotiator for Carlson Companies and E. F. McDonald Company.

Margaret, born in 1944, holds a BA from the College of St. Catherine with double concentrations in business administration and marketing, with a minor in economics.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised and/or supervisory person providing investment advice. Margaret has not been involved in any legal or disciplinary event that would be considered material to a client's or perspective client's evaluation of our advisory business or the integrity of its management.

Item 4 – Other Business Activities

Margaret is not actively engaged in any investment-related business for compensation outside of WCMI nor does she receive incentive compensation or economic benefits for providing advisory services to anyone other than clients of WCMI or to recommend certain securities or investment products.

Item 5 – Additional Compensation

Margaret does not receive compensation or economic benefits (including sales awards or prizes) from someone who is not a client for providing advisory services.

Item 6 – Supervision

Brian Kertz, as the Chief Compliance Officer (CCO), monitors Margaret Jones' investment advisory activities and adherence to WCMI's Compliance Program and Code of Ethics Policy. In addition, Brian Kertz performs prompt reviews of all trading activity, new account establishment, correspondence, monthly client statements, and a timely review of reconciliations of account holdings against client objectives, risk tolerance and asset allocation.

In addition to the ongoing supervisory / principal review, Brian Kertz conducts daily transactional reviews and weekly cumulative account activity reviews. Brian Kertz also conducts monthly inspections of all firm activities, including the monthly review of client brokerage statements or transactions, and an annual review of Margaret's personal investment holdings reports.

Brian Kertz conducts monthly reviews and reconciliation of portfolio holdings against custodian's statements, and monitor and verify the calculation of advisory fees on a quarterly basis. Advisory clients may contact Brian Kertz directly.

Brian Kertz, Chief Executive Officer

(612) 341-2218

Appendix B

Brian H. Kertz
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CRD No. 2464023

Wrap Fee Program Brochure Supplement
(Part 2B of SEC Form ADV)

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This Brochure Supplement provides information about Brian H. Kertz that supplements the WCMi Brochure. You should have received a copy of that Brochure. Please contact us at (612) 341-2218 or email us at clientservices@wcmi-email.com if you did not receive WCMi's Brochure or if you have any questions about the content of this Supplement.

Additional information about Brian H. Kertz is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

BRIAN H. KERTZ is the Chief Executive Officer, Chief Compliance Officer, Investment Strategist and Money Manager for WCM, Inc. (d/b/a WCMI). Brian has held the position of CEO since 2014, when Margaret Jones, the previous CEO, sold the company to the three key employees. Brian has held the position of CCO since 2021 when Rose Hanson, the previous CCO, sold the company to Brian Kertz and Linda Wilke.

Brian's professional experience includes over twenty-five years in the investment industry. He cut his teeth in the business as a securities trader for Cetera Financial Institutions trading stocks, stock options, mutual funds and precious metals. Then, as a Senior Trader at Securian Financial Services, he provided new hire training to registered representatives while overseeing the trade desk staff and day-to-day activities. In this role, he also supervised registered investment adviser trading and acted as the trading department expert for the investment advisory department while assisting them in the implementation of internal processes, policies and procedures. Prior to becoming CEO of WCMI, Brian acted in various capacities at WCMI including operations manager, client relationship manager and most recently co-portfolio manager.

Brian, born in 1969, graduated from St. Cloud State University with a BS in Finance and Economics.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised and/or supervisory person providing investment advice. Brian has not been involved in any legal or disciplinary event that would be considered material to a client's or prospective client's evaluation of our advisory business or the integrity of its management.

Item 4 – Other Business Activities

Brian is not actively engaged in any investment-related business for compensation outside of WCMI nor does he receive incentive compensation or economic benefits for providing advisory services to anyone other than clients of WCMI or to recommend certain securities or investment products.

Item 5 – Additional Compensation

Brian does not receive compensation or economic benefits (including sales awards or prizes) from someone who is not a client for providing advisory services.

Item 6 – Supervision

Linda Wilke, as the Chief Financial Officer (CFO) and an owner of WCM Inc., monitors Brian Kertz' investment advisory activities and adherence to WCMI's Compliance Program and Code of Ethics Policy. In addition, Linda Wilke performs prompt reviews of all trading activity, new account establishment, correspondence, monthly client statements, and a timely review of reconciliations of account holdings against client objectives, risk tolerance and asset allocation.

Ms. Wilke also conducts monthly inspections of all firm activities and an annual review of Brian's personal investment holdings reports.

Advisory clients may contact either Linda Wilke directly.

Linda Wilke, Chief Financial Officer

(612) 341-2218

Appendix C

Linda Sue Wilke
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CRD No. 2151254

Wrap Fee Program Brochure Supplement
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This Brochure Supplement provides information about Linda S. Wilke that supplements the WCM Brochure. You should have received a copy of that Brochure. Please contact us at (612) 341-2218 or email us at clientservices@wcmi-email.com if you did not receive WCM's Brochure or if you have any questions about the content of this Supplement.

Additional information about Linda S. Wilke is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

LINDA SUE WILKE is the Chief Financial Officer for WCM, Inc. (d/b/a WCMI). Linda has held the position of CFO since 2014, when Margaret Jones, the previous CFO, sold the company to the three key employees. As of February 26, 2021, the owners of WCMI are Brian Kertz and Linda Wilke.

Linda's professional experience includes over twenty years in the investment industry. Prior to becoming CFO of WCMI, Linda was the Financial Operations Manager with WCMI. Linda also acted in various capacities at WCMI including maintaining financial books and records, preparing and reporting required financial reports to the required governing bodies; facilitating state registration; assisting in compliance matters; and assisting with audits from outside and internal examiners.

Linda, born in 1968, graduated from St. Catherine University with a BA in Business Administration with a concentration in Accounting.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of each supervised and/or supervisory person providing investment advice. Linda has not been involved in any legal or disciplinary event that would be considered material to a client's or prospective client's evaluation of our advisory business or the integrity of its management.

Item 4 – Other Business Activities

Linda is not actively engaged in any investment-related business for compensation outside of WCMI nor does she receive incentive compensation or economic benefits for providing advisory services to anyone other than clients of WCMI or to recommend certain securities or investment products.

Item 5 – Additional Compensation

Linda does not receive compensation or economic benefits (including sales awards or prizes) from someone who is not a client for providing advisory services.

Item 6 – Supervision

Brian Kertz, as the Chief Compliance Officer (CCO), monitors Linda Wilke's investment advisory activities and adherence to WCMI's Compliance Program and Code of Ethics Policy. Ms. Wilke does not provide investment advice to clients; therefore, supervision of such activities is not required. Brian Kertz performs prompt reviews of Linda's correspondence, monthly account statements and firm regulatory financial reporting and supporting documents.

In addition to the ongoing supervisory / principal review, Brian Kertz conducts a monthly review of Linda's personal investment activity and an annual review of Linda's personal investment holdings. Ms. Wilke maintains regulatory registrations in accordance with federal and state regulations and company policies and procedures.

Advisory clients may contact Brian Kertz directly.

Brian Kertz, Chief Executive Officer

(612) 341-2218