

# **Wealth Management Group, LLC**

220 Beiser Boulevard

Dover, DE 19904

(302) 734-5826

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

March 4, 2022

This Brochure provides information about the qualifications and business practices of Wealth Management Group, LLC (“WMG”). If you have any questions about the contents of this Brochure, please contact us at (302) 734-5826. 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.

WMG 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 about which you determine to hire or retain an Adviser.

Additional information about WMG also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for WMG is 113051.

## Item 2 – Material Changes

This Item 2 of this Brochure will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes.

We do not have material changes for our current Brochure, however, please note that we have updated the Assets Under Management information of Item 4 in accordance with the filing of our Annual Updating Amendment on March 4, 2022.

Currently, our Brochure may be requested by contacting Judi Pflaumer, Chief Compliance Officer of WMG at (302) 734-5826.

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

(Brochure Date: 03/04/22)

(Date of Most Recent Annual Updating Amendment: 03/04/22)

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## Item 4 – Advisory Business

WMG is owned by 5 individual members (see [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) for WMG's Form ADV Part 1, Schedule A for a list of all individuals' names) and has been providing advisory services since 2001.

As of December 31, 2021, WMG managed approximately \$320,620,868 on a discretionary basis and none on a nondiscretionary basis. WMG also provided consulting services to participant-directed retirement account assets of approximately \$31,439,869.

### **Investment Management Services:**

WMG manages investment portfolios for individuals, pension and profit-sharing plans, trusts, charitable organizations, corporations and other business entities. WMG works with clients to determine investment objectives and investor risk profile and design a written Investment Policy Statement. The Investment Policy Statement will serve as a basis for approaching investment decisions. WMG uses investment and portfolio allocation software to evaluate alternative portfolio designs and will assist the client in selecting investment strategies that are consistent with the client's Investment Policy. WMG may evaluate the client's existing investments with respect to the client's Investment Policy and individual performance. WMG may work with a client to develop a transition plan in order to move from the client's existing allocation to the asset allocation recommended by WMG. WMG will monitor the performance of the assets as well as the asset allocation strategy and will hold regular review meetings with the client as necessary and produce quarterly performance reports for the client.

WMG will typically create a portfolio of no-load mutual funds, and may use model portfolios if the models match the client's investment policy. WMG will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. WMG primarily recommends portfolios consisting of passively managed asset class and index mutual funds. WMG primarily recommends mutual funds offered by Dimensional Fund Advisors (DFA). DFA sponsored mutual funds follow a passive asset class investment philosophy with low holdings turnover. WMG may also utilize other passively managed mutual funds, including mutual funds offered by Vanguard, Vericimetry and Bridgeway.

Client portfolios may also include some individual equity securities in situations where disposition of these securities would present an overriding tax implication or the client specifically requests they be retained for a personal reason. These situations will be specifically identified in the client's Investment Policy Statement (IPS).

WMG manages mutual fund and equity portfolios on a discretionary basis according to the investment policy selected by the client. A client may impose any reasonable restrictions on WMG's discretionary authority, including restrictions on the types of securities in which WMG may invest client's assets and on specific securities, which the client may believe to be appropriate.

WMG may also recommend fixed income portfolios to advisory clients, which consist of managed accounts of individual bonds. WMG will request discretionary authority from advisory clients to manage fixed income portfolios, including the discretion to retain a third-party fixed income manager. WMG will prepare a separate Fixed Income Investment Policy Statement for any client qualifying for separate fixed income portfolio services.

Pursuant to its discretionary authority, WMG will retain a fixed income securities manager. The fixed income securities manager will be provided with the discretionary authority to invest client assets in fixed income securities consistent with the client's Fixed Income Investment Policy Statement. The manager will also monitor the account for changes in credit ratings, security call provisions, and tax loss harvesting opportunities (to the extent that the manager is provided with cost basis information). The manager will obtain WMG's consent prior to the sale of any client securities.

On an ongoing basis, WMG will answer clients' inquiries regarding their accounts and review periodically with clients the performance of their accounts. WMG will periodically, and at least annually, review client's investment policy, risk profile and to discuss the re-balancing of each client's accounts to the extent appropriate. WMG will provide to investment manager any updated client financial information or account restrictions necessary for investment manager to provide sub-advisory services. Complete fixed income portfolios generally require a minimum investment of (\$400,000) although individual bonds may be purchased in smaller increments.

In addition to managing the client's investment portfolio, WMG will consult with clients on various financial areas including income and estate tax planning, business sale structures, college financial planning, retirement planning, insurance analysis, personal cash flow analysis, establishment and design of retirement plans and trust designs, among other things.

#### **Employee Benefit Retirement Plan Services:**

WMG also provides advisory services to participant-directed retirement plans through third-party administration services, which are online bundled service providers offering an opportunity for plan sponsors to provide their participants with daily account access, valuation, and investment education.

WMG will analyze the plan's current investment platform, and assist the plan in creating an investment policy statement defining the types of investments to be offered and the restrictions that may be imposed. WMG will recommend investment options to achieve the plan's objectives, provide participant education meetings, and monitor the performance of the plan's investment vehicles.

WMG will recommend changes in the plan's investment vehicles as may be appropriate from time to time. WMG generally will review the plan's investment vehicles and investment policy as necessary.

For certain retirement plans, WMG also works in coordination and support with Buckingham Strategic Partners. Buckingham Strategic Partners will assist WMG in the development of investment options that WMG may recommend to participant-directed retirement plan accounts. Retirement plan clients will

engage both WMG as the 3(21) fiduciary and Buckingham Strategic Partners. Buckingham Strategic Partners will act as the 3(38) fiduciary and provide to the client additional discretionary investment management services and will exercise discretionary authority to select the plan investments made available to the plans' participants by selecting and maintain the plans' investments according to the goals and investment objectives of the plan.

WMG will continue to work with plans to monitor plan investments, provide fiduciary plan advice including regular considerations of the goals and objectives of the plan, and provide participant education services to the plan.

### **Financial Planning Services:**

WMG also provides advice in the form of Financial Planning. Clients purchasing this service will receive a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern:

- Personal: Family records, budgeting, personal liability, estate information and financial goals.
- Tax & Cash Flow: Income tax and spending analysis and planning for past, current and future years. WMG may illustrate the impact of various investments on a client's current income tax and future tax liability.
- Death & Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.
- Retirement: Analysis of current strategies and investment plans to help the client achieve his or her retirement goals.
- Investments: Analysis of investment alternatives and their effect on a client's portfolio.

WMG gathers required information through in-depth personal interviews. Information gathered includes a client's current financial status, future goals and attitudes towards risk. Related documents supplied by the client are carefully reviewed, including a questionnaire completed by the client, and a written report is prepared. Should a client choose to implement the recommendations in the plan, WMG suggest the client work closely with his/her attorney, accountant or insurance agent. Implementation of financial plan recommendations is entirely at the client's discretion.

## **Item 5 – Fees and Compensation**

In certain circumstances, all fees, account minimums and their applications to family circumstances may be negotiable.

WMG has contracted with Buckingham Strategic Partners, for services including trade processing, collection of management fees, record maintenance, report preparation, marketing assistance, and

research. WMG has also contracted with Buckingham Strategic Partners for sub-advisory services with respect to clients' fixed income accounts. WMG pays a fee for Buckingham Strategic Partners services based on management fees paid to WMG on accounts that use Buckingham Strategic Partners. The fee paid by WMG to Buckingham Strategic Partners consists of a portion of the fee paid by clients to WMG and varies based on the total client assets participating in Buckingham Strategic Partners through WMG. These fees are not separately charged to advisory clients. Buckingham Strategic Partners also serves as a fixed income sub-advisor to WMG.

The specific manner in which fees are charged by WMG is established in a client's written agreement with WMG. Management fees shall apply to cash balances unless negotiated otherwise. For investment management & employee benefit plan services, clients will be invoiced in advance at the beginning of each calendar quarter based upon the value (market value based on independent third-party sources or fair market value in the absence of market value; client account balances on which WMG calculates fees may vary from account custodial statements based on independent valuations and other accounting variances, including mechanisms for including accrued interest in account statements) of the client's account at the end of the previous quarter. New accounts are charged a prorated fee for the remainder of the quarter in which the account is incepted (date of first trade).

For Investment Management and Employee Benefit Plan Services, WMG will request authority from the client to receive quarterly payments directly from the client's account held by an independent custodian. Clients may provide written limited authorization to WMG or its designated service provider, Buckingham Strategic Partners, to withdraw fees from the account. Clients will receive custodial statements showing the advisory fees debited from their account(s). Certain third-party administrators will calculate and debit WMG's fee and remit such fee to WMG.

A client agreement may be canceled at any time, by either party, for any reason upon receipt of 30 days written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded.

WMG's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third-party investment and other third parties such as fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. These fees will generally include a management fee and other fund expenses. All fees paid to WMG for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders.

Such charges, fees and commissions are exclusive of and in addition to WMG's fee, and WMG shall not receive any portion of these commissions, fees, and costs.

## **Advisory Fees**

### **Investment Management Services:**

The annual fee for investment management services will be charged as a percentage of assets under management, according to the schedule below:

<b>Assets Under Management</b>	<b>Annual Fee (%)</b>
Up to \$199,999***	1.50%
\$200,000 - \$999,999	1.00%
\$1,000,000 - \$1,999,999	0.90%
\$2,000,000 - \$2,999,999	0.80%
\$3,000,000 - \$3,999,999	0.70%
\$4,000,000 or greater	0.60%

All accounts for members of the client's family (husband, wife and dependent children) or related businesses may be assessed fees based on the total balance of all accounts.

### **Employee Benefit Retirement Plan Services:**

The annual fee for participant directed retirement plan services will be charged as a percentage of assets within the plan.

<b>Assets Under Management</b>	<b>Buckingham Strategic Partners' Annual Fee</b>	<b>WMG's Annual Fee</b>	<b>Total Fee</b>
On the first \$1,000,000	0.20%	0.70%	0.90%
On the next \$4,000,000	0.15%	0.45%	0.60%
On the next \$5,000,000	0.008%	0.25%	0.33%
On all amounts above \$10,000,000	0.05%	0.15%	0.20%

WMG and Buckingham Strategic Partners share this fee according to percentage negotiated between WMG and Buckingham Strategic Partners. Certain pre-existing employee benefit plan services clients may be on a different fee schedule.

### **Financial Planning Services:**

WMG charges fees for financial planning. The hourly fee is up to \$300/hr, depending on the nature and complexity of a client's financial situation. The fee is paid after the consultation.

WMG may also charge an hourly fee of up to \$300/hr for the review and evaluation of certain 529 Plans when the client's assets under management, excluding the balance of the 529 accounts, are below the WMG's minimum account threshold.

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

WMG does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as described above and are not charged on the basis of income or capital gains or capital appreciation of the funds or any portion of the funds of an advisory client.

## **Item 7 – Types of Clients**

WMG manages investment portfolios for individuals, pension and profit-sharing plans trusts, charitable organizations, corporations and other businesses entities.

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

### *Methods of Analysis and Investment Strategy*

WMG's services are based on long-term investment strategies incorporating the principles of Modern Portfolio Theory. WMG's investment approach is firmly rooted in the belief that markets are "efficient" over periods of time and that investors' long-term returns are determined principally by asset allocation decisions, rather than market timing or stock picking. WMG recommends diversified portfolios, principally through the use of passively managed, asset class mutual funds. WMG selects or recommends to clients portfolios of securities, principally broadly-traded open end mutual funds or conservative fixed income securities to implement this investment strategy.

Although all investments involve risk, WMG's investment advice seeks to limit risk through broad diversification among asset classes and, as appropriate for particular clients the investment directly in conservative fixed income securities to represent the fixed income class. WMG's investment philosophy is designed for investors who desire a buy and hold strategy. Frequent trading of securities increases brokerage and other transaction costs that WMG's strategy seeks to minimize.

In the implementation of investment plans, WMG therefore primarily uses mutual funds and, as appropriate, portfolios of conservative fixed income securities. WMG may also utilize Exchange Traded Funds (ETFs) to represent a market sector.

Clients may hold or retain other types of assets as well, and WMG may offer advice regarding those various assets as part of its services. Advice regarding such assets will generally not involve asset management services but may help to more generally assist the client.

WMG's strategies do not utilize securities that we believe would be classified as having any unusual risks, and we do not recommend frequent trading, which can increase brokerage and other costs and taxes.

WMG receives supporting research from Buckingham Strategic Partners and from other consultants, including economists affiliated with Dimensional Fund Advisors ("DFA"). WMG utilizes DFA mutual funds in client portfolios. DFA mutual funds follow a passive asset class investment philosophy with low holdings turnover. DFA provides historical market analysis, risk/return analysis, and continuing education to WMG.

### *Analysis of a Client's Financial Situation*

In the development of investment plans for clients, including the recommendation of an appropriate asset allocation, WMG relies on an analysis of the client's financial objectives, current and estimated future resources, and tolerance for risk. To derive a recommended asset allocation, WMG may use a Monte Carlo simulation, a standard statistical approach for dealing with uncertainty. As with any other methods used to make projections into the future, there are several risks associated with this method, which may result in the client not being able to achieve their financial goals. They include:

- The risk that expected future cash flows will not match those used in the analysis
- The risk that future rates of return will fall short of the estimates used in the simulation
- The risk that inflation will exceed the estimates used in the simulation
- For taxable clients, the risk that tax rates will be higher than was assumed in the analysis

### *Risk of Loss*

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

All investments present the risk of loss of principal – the risk that the value of securities (mutual funds, ETFs and individual bonds), when sold or otherwise disposed of, may be less than the price paid for the securities. Even when the value of the securities when sold is greater than the price paid, there is the risk that the appreciation will be less than inflation. In other words, the purchasing power of the proceeds may be less than the purchasing power of the original investment.

The mutual funds and ETFs utilized by WMG may include funds invested in domestic and international equities, including real estate investment trusts (REITs), corporate and government fixed income securities and commodities. Equity securities may include large capitalization, medium capitalization and small capitalization stocks. Mutual funds and ETF shares invested in fixed income securities are subject to the same interest rate, inflation and credit risks associated with the underlying bond holdings.

Among the riskiest mutual funds used in WMG's investment strategies funds are the U.S. and International small capitalization and small capitalization value funds, emerging markets funds, and commodity futures funds. Conservative fixed income securities have lower risk of loss of principal, but most bonds (with the exception of Treasury Inflation Protected Securities, or TIPS) present the risk of loss of purchasing power through lower expected return. This risk is greatest for longer-term bonds.

Certain funds utilized by WMG may contain international securities. Investing outside the United States involves additional risks, such as currency fluctuations, periods of illiquidity and price volatility. These risks may be greater with investments in developing countries.

More information about the risks of any particular market sector can be reviewed in representative mutual fund prospectuses managing assets within each applicable sector.

## **Item 9 – Disciplinary Information**

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

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

### Affiliated Accounting Firm

WMG's investment advisor reps are also engaged in professions other than giving financial planning and investment advice. CPA services are available to our clients for a separate fee. These professions take up most of their work weeks. Mr. Brown, while also a CPA, functions as the managing partner for Wealth Management Group, LLC and spends 20-30% of his time overseeing the operation.

Mr. Brown, Mr. Book, Mr. Vascik, Ms. Lawrence, Mrs. Pflaumer and Mrs. Zook are all members and/or employees of Raymond F. Book & Associates, P.A. a CPA firm (hereinafter RB&A). RB&A may recommend WMG to accounting clients in need of advisory services. WMG may recommend RB&A to advisory clients in need of accounting services. Accounting services provided by RB&A are separate and distinct from the advisory services of WMG, and are provided for separate and typical compensation. There are no referral fee arrangements between WMG and RB&A for these recommendations. No WMG client is obligated to use RB&A for any accounting services. In certain circumstances, WMG may pay RB&A for tax return preparation services for certain WMG clients who have also separately engaged RB&A.

### Buckingham Strategic Partners

As described above in Item 4, WMG may exercise discretionary authority provided by a client to select an independent third-party investment manager for the management of portfolios of individual fixed income securities. WMG selects Buckingham Strategic Partners for such fixed income management. WMG also contracts with Buckingham Strategic Partners for back-office services and assistance with portfolio modeling. WMG has a fiduciary duty to select qualified and appropriate managers in the client's best interest, and believes that Buckingham Strategic Partners effectively provides both the back-office services that assist with its overall investment advisory practice and fixed income portfolio management services. The management of WMG continuously makes this assessment. While WMG has a contract with Buckingham Strategic Partners governing a time period for back-office services, WMG has no such fixed commitment to the selection of Buckingham Strategic Partners for fixed income management services and may select another investment manager for clients upon reasonable notice to Buckingham Strategic Partners.

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

WMG has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. WMG's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients and sets forth WMG's practice of supervising the personal securities transactions of employees with access to client information.

Individuals associated with WMG may buy or sell securities for their personal accounts identical or different than those recommended to clients. It is the expressed policy of WMG that no person employed by the firm shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, WMG requires that anyone associated with this advisory practice with access to advisory recommendations provide annual securities holding reports and quarterly transaction reports to the firm's principal. WMG also requires such access persons to receive approval from the Chief Compliance Officer prior to investing in any IPO's or private placements (limited offerings).

WMG's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information and protecting the confidentiality of client information. WMG requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. Any individual not in observance of the above may be subject to discipline.

WMG will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

It is WMG's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. WMG will also not cross trades between client accounts. Principal transactions are

generally defined as transactions where an advisor, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated private fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment advisor in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an advisor is dually registered as a broker-dealer or has an affiliated broker-dealer.

## **Item 12 – Brokerage Practices**

WMG arranges for the execution of securities transactions with the assistance of Buckingham Strategic Partners. Through Buckingham Strategic Partners, WMG participates in the Schwab Advisor Services (“SAS”) program offered to independent investment advisors by Charles Schwab & Company, Inc., member FINRA/SIPC, the Fidelity Institutional Wealth Services (“FIWS”) program offered to independent investment advisors, sponsored by Fidelity Brokerage Services, LLC (“Fidelity”), member FINRA/SIPC, and the TD Ameritrade Institutional (“TDA”) services program offered to independent investment advisors by TD Ameritrade Institutional, a division of TD Ameritrade, Inc. (“TD Ameritrade”), member FINRA/SIPC. Schwab, Fidelity and TD Ameritrade are unaffiliated SEC-registered broker dealers and FINRA member broker dealers.

The Schwab, Fidelity and TD Ameritrade brokerage programs will generally be recommended to advisory clients for the execution of mutual fund and equity securities transactions. WMG regularly reviews these programs to ensure that its recommendations are consistent with its fiduciary duty. These trading platforms are essential to WMG's service arrangements and capabilities, and WMG may not accept clients who direct the use of other brokers. As part of these programs, WMG receives benefits that it would not receive if it did not offer investment advice (See the disclosure under Item 14 of this Brochure).

As WMG will not request the discretionary authority to determine the broker dealer to be used or the commission rates to be paid for mutual fund and equity securities transactions, clients must direct WMG as to the broker dealer to be used. In directing the use of a particular broker or dealer, it should be understood that WMG will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. Not all investment advisers require clients to direct the use of specific brokers.

WMG will not exercise authority to arrange client transactions in fixed income securities. Clients will provide this authority to a fixed income manager retained by WMG on client's behalf by designating the portfolio manager with trading authority over client's brokerage account. Clients will be provided with the Disclosure Brochure (Form ADV Part 2) of portfolio manager.

SAS, FIWS and TDA do not generally charge clients a custody fee and are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the broker or that settle into the clients' accounts at the brokers. Trading client accounts through other brokers may result in fees (including mark-ups and mark-downs) being charged by the custodial broker and an additional broker. While WMG will not arrange transactions through other brokers, the authority of the fixed income portfolio manager includes the ability to trade client fixed income assets through other brokers.

WMG does not have any arrangements to compensate any broker dealer for client referrals.

WMG does not maintain any client trade error gains. WMG makes client whole with respect to any trade error losses incurred by client caused by WMG. For clients utilizing TD Ameritrade for brokerage services, TD Ameritrade maintains a policy that any trade error gains will be donated by TD Ameritrade to charity.

WMG generally does not aggregate any client transactions in mutual fund or other securities. Client accounts are individually reviewed and managed, and transaction costs are not saved by aggregating orders in almost all circumstances in which WMG arranges transactions. Buckingham Strategic Partners, in the management of fixed income portfolios, will aggregate certain transactions among client accounts that it manages, in which case a WMG client's orders may be aggregated with an order for another client of Buckingham Strategic Partners who is not a WMG client. See Buckingham Strategic Partners Form ADV Part 2.

#### **Employee Benefit Retirement Plan Services:**

WMG does not arrange for the execution of securities transactions for 401k plans as a part of this service. Transactions are executed directly through employee plan participation.

#### **Financial Planning Services:**

WMG' financial planning practice, due to the nature of its business and client needs, does not include blocking trades, negotiating commissions with broker dealers or obtaining volume discounts, nor necessarily obtaining the best price. Clients will be required to select their own broker dealers and insurance companies for the implementation of financial planning recommendations. WMG may recommend any one of several brokers. WMG clients must independently evaluate these brokers before opening an account. The factors considered by WMG when making this recommendation are the broker's ability to provide professional services, WMG' experience with the broker, the broker's reputation, and the broker's financial strength, among other factors. WMG' financial planning clients may use any broker or dealer of their choice.

## Item 13 – Review of Accounts

### **Reviews:**

#### **Investment Management Services:**

Account assets are supervised continuously and formally reviewed quarterly, at a minimum, by the client's assigned investment advisor representative. The review process contains each of the following elements:

- a. assessing client goals and objectives;
- b. evaluating the employed strategy(ies);
- c. monitoring the portfolio(s); and
- d. addressing the need to rebalance.

Additional account reviews may be triggered by any of the following events:

- a. a specific client request;
- b. a change in client goals and objectives;
- c. an imbalance in a portfolio asset allocation; and
- d. market/economic conditions.

For fixed income portfolios, certain account review responsibilities are delegated to a third-party investment manager as described above in Item 4.

#### **Employee Benefit Retirement Plan Services:**

Retirement plan assets are reviewed quarterly, and according to the standards and situations described above for investment management accounts.

#### **Financial Planning Services:**

Clients with financial planning accounts can have their accounts reviewed at their discretion by their investment advisor rep. WMG suggests that this be done at a minimum of once per year. The review process contains these elements:

- A. Assess client goals & objectives; and
- B. Evaluate the strategy which has been employed

Financial planning reviews may be triggered by one or more of the following events:

- A. Specific client request
- B. Change in client goals & objectives; and

C. Imbalance of portfolio asset allocation.

### **Reports:**

#### **Investment Management:**

All clients will receive quarterly performance reports, prepared by Buckingham Strategic Partners and reviewed by WMG, that summarize the client's account and asset allocation. Clients will also receive at least quarterly statements from their account custodian, which will outline the client's current positions and current market value.

#### **Employee Benefit Retirement Plan Services**

Plan sponsors are provided with quarterly information and annual performance reviews from WMG. In addition, plan participant education information may also be provided to the Plan Sponsor or Administrator for distribution to the participants of the plan.

#### **Financial Planning Services:**

Financial Planning clients will receive reports as contracted for at the inception of the advisory relationship.

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

As indicated under the disclosure for Item 12, SAS, FIWS and TDA each respectively provide WMG with access to services, which are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them.

These services benefit WMG but may not benefit its clients' accounts. Many of the products and services assist WMG in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of WMG's fees from its clients' accounts, and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of WMG's accounts. Recommended brokers also make available to WMG other services intended to help WMG manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. WMG does not, however, enter into any commitments with the brokers for transaction levels in exchange for any services or products from brokers. While as a fiduciary, WMG endeavors to act in its clients' best interests, WMG's requirement that clients maintain their assets in accounts at SAS, FIWS or TDA may be based in part on the benefit to WMG of the availability of some of

the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the brokers, which may create a potential conflict of interest.

WMG also receives software from DFA, which WMG utilizes in forming assets allocation strategies and producing performance reports. DFA also provides continuing education for WMG personnel. These services are designed to assist WMG plan and design its services for business growth.

## **Item 15 – Custody**

Investment Management and Employee Benefit Plan Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. WMG urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Item 16 – Investment Discretion**

WMG requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold. For fixed income securities, this authority will include the discretion to retain a third-party money manager for fixed income accounts. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

When selecting securities and determining amounts, WMG observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to WMG in writing.

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

Proxy Voting: As a matter of firm policy and practice, WMG does not accept the authority to and does not vote proxies on behalf of advisory client. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients will receive applicable proxies directly from the issuer of securities held in clients' investment portfolios. WMG, however, may provide advice to clients regarding the clients' voting of proxies.

Class Actions, Bankruptcies and Other Legal Proceedings: Clients should note that WMG will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held or previously were held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct WMG to transmit copies of class action

notices to the client or a third party. Upon such direction, WMG will make commercially reasonable efforts to forward such notices in a timely manner.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about WMG's financial condition. WMG has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.