

## Item 1: Cover Page

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# **Wolf Group Capital Advisors** Form ADV Part 2A Investment Adviser Brochure

12701 Fair Lakes Circle, Suite 220  
Fairfax, VA 22033  
(703) 502-9500  
[www.wolfgroupcapital.com](http://www.wolfgroupcapital.com)

September 2022

This Brochure provides information about the qualifications and business practices of Wolf Group Capital Advisors (“we,” “us,” “our”). If you have any questions about the contents of this Brochure, please contact April Turch, Chief Compliance Officer, at (703) 502-9500 or [aturch@wolfgroupcapital.com](mailto:aturch@wolfgroupcapital.com).

Additional information about our Firm is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). 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.

## Item 2: Summary of Material Changes

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### **Annual Update**

In this Item of Wolf Group Capital Advisors' ("WGCA," "we," "us," "ours" or the "Firm") Form ADV 2, we are required to discuss any material changes that have been made to Form ADV since the last Annual Amendment, dated September 28, 2021.

### **Material Changes since the Last Update**

Since our last Annual Amendment filing, we have no material changes to report.

### **Full Brochure Available**

Our Form ADV may be requested at any time, without charge by contacting April Turch, Chief Compliance Officer, at (703) 502-9500 or [aturch@wolfgroupcapital.com](mailto:aturch@wolfgroupcapital.com).

Additional information about our Firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). 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.

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## Item 4: Advisory Business

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Wolf Group Capital Advisors is an investment adviser and provides investment advisory and financial planning services to individuals, high net worth individuals and trusts.

WGCA was founded in 1996 and is owned by Robert D. Len, Leonard S. Wolf, and Charles K. Verruggio.

### **Investment Advisory Services**

We provide investment advice and implement investment strategies for clients based on their individual circumstances. We manage accounts on a discretionary (which means selection of investments will be made for the client without obtaining consent from the client prior to making a purchase or sale for the account) or non-discretionary basis, depending on the client's preference.

Through personal discussions, we develop portfolios based upon a client's goals, objectives, investment time horizon and risk tolerance, as well as their core financial-related values. We develop a brief written investment policy statement, including a detailed asset allocation, describing the investment goals and investment strategy.

We use asset allocations or spreading investments among a number of asset classes and sectors (domestic stocks vs. foreign stocks; value vs. growth; large-cap stocks vs. small-cap stocks; corporate bonds vs. government securities) for client accounts. The types of securities purchased for client portfolios may include stocks, bonds, exchange traded funds and mutual funds. We may also use alternative investments where applicable, based upon a client's investment strategy. After reviewing the asset allocation with the client, the investment strategy will be implemented. Investment strategies generally include long-term and short-term purchases depending upon the individual needs of the client.

### **Financial Planning**

We offer financial planning to clients, which includes an initial meeting with the prospective client to determine the scope of the service desired. Subsequently, a proposal is developed summarizing the issues to be addressed, the analysis to be performed and the fee for the financial planning engagement. The proposal also includes a list of information and items that we require to complete the financial plan. Financial planning may be provided as part of our investment advisory services, or as a standalone service for a fixed-fee, or as a monthly subscription service.

Financial planning may include a review of all aspects of a client's current financial situation, including, but not limited to the following components; cash management, insurance planning, education planning, charitable giving, retirement planning, estate tax planning, and capital needs.

Financial plan recommendations are not limited to any specific product or service offered by a broker/ dealer or insurance company. With respect to estate planning, we work closely with attorneys qualified to assist clients in the development of wills and trusts. For insurance plans, we work closely with qualified internal and external insurance professionals.

### **Third-Party Asset Management Programs**

In addition to managing client accounts directly, in certain circumstances, we will recommend that a client engage (for all or a portion of its portfolio) a Third-Party Asset Management Program to provide additional services or expertise that we believe will be beneficial to the client. These services will be outlined in a separately executed discretionary asset management agreement with the Third-Party Asset Manager and will be provided for a fee that is separate and distinct from fees we charge you.

Our Investment Advisor Representatives (IARs) will provide personal advisory services to clients in the selection of a particular Third-Party Asset Manager. Factors considered in the selection of a Third-Party Asset Managers include but may not be limited to i) each individual IAR's preference for a particular Third-Party Asset Manager; ii) the client's risk tolerance, goals, and objectives, as well as investment experience; and iii) the size of the client's assets available for investment.

In order to assist in the selection of a Third-Party Asset Manager, the IAR will typically gather information from the client about the client's financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

Our IARs will periodically review reports provided to the client. An IAR will contact the client periodically, as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the Third-Party Asset Manager managing the account as warranted, and to assist the client in understanding and evaluating the services provided by the Third-Party Asset Manager. Clients will be expected to notify their IAR of any changes in their financial situation, investment objectives, or account restrictions. We will communicate any changes to your investment objectives to the Third-Party Asset Manager managing your account(s).

We will provide you with a complete description of the programs and services (including fees to be charged and other contractual information) provided by the Third-Party Asset Manager, as well as the Third-Party Asset Manager's Form ADV, investment advisory contracts, and account opening documents.

### **Tailored Relationships**

We tailor investment advisory services to the individual needs of the client. The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Our clients are allowed to impose restrictions on the investments in their account. We may accept any

reasonable limitation or restriction to discretionary authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to us in writing.

### **Fiduciary Statement**

Our Firm and our employees are fiduciaries who must take into consideration the best interests of our clients. We will act with competence, dignity, integrity, and in an ethical manner, when dealing with clients. We will use reasonable care and exercise independent professional judgement when conducting investment analysis, making investment recommendations, trading, promoting our services, and engaging in other professional activities.

As a fiduciary, we have the obligation to deal fairly with our clients. We have the following responsibilities when working with a client:

- To render impartial advice;
- To make appropriate recommendations based on the client's needs, financial circumstances and investment objectives;
- To exercise a high degree of care and diligence to ensure that information is presented in an accurate manner and not in a way to mislead;
- To have reasonable basis, information, and understanding of the facts in order to provide appropriate recommendations and representations;
- Disclose any material conflict of interest in writing; and
- Treat clients fairly and equitably.

### **Wrap Fee Programs**

We act as a sponsor and portfolio manager to one wrap-fee program and as a portfolio manager to another wrap-fee program. A "wrap-fee" program is one that provides the client with advisory and brokerage execution services for an all-inclusive fee. The client is not charged separate fees for the respective components of the total service.

### ***Sponsor and Portfolio Manager***

We are both the sponsor and portfolio manager of a Separate Account Strategy Wrap Program (the WGCA Program). The WGCA Program is no longer offered to new clients.

We provide investment supervisory services through the WGCA Program, defined as giving continuous advice to a client or making investments for a client based on the individual needs of the client. Our Firm, through our qualified Investment Adviser Representatives (IARs), will continuously manage client portfolios based on the individual needs of the client. All IARs hold all required licenses and/or qualifications. At the time of a client's initial investment in the program, an IAR will assist the client in determining the client's current financial situation, financial goals and objectives, and attitudes toward risk. This determination will allow the IAR to review the client's situation and determine an appropriate asset allocation. Account supervision is guided by the stated objectives of the client. The WGCA Program may cost the client more or less than purchasing such services separately.

More detail on the Separate Account Strategy Wrap Program may be found in Form ADV Part 2A Appendix 1, available upon request.

***Portfolio Manager for Future Ready Wrap Fee Program***

We offer portfolio management services to new clients in the accumulation stage, through a Wrap Fee Program sponsored by a broker/dealer. We make the investment selections and create portfolio models for this program. Clients should refer to the broker/dealers Wrap Fee Program Brochure (Form ADV Part 2A Appendix 1) for more detailed information about the services offered in the program.

**Client Assets**

As of June 30, 2022, we managed \$372,810,806 in assets. \$366,858,589 managed on a discretionary basis, and \$5,952,217 managed on a non-discretionary basis.

## Item 5: Fees and Compensation

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We base our fees on a percentage of assets under management, hourly charges, and fixed fees, as described below.

### **Compensation – Investment Advisory Services**

The annual fees for investment advisory services are as follows:

| <b>Assets Under Management</b> | <b>Annual Fee</b> |
|--------------------------------|-------------------|
| First \$499,999                | 1.50%             |
| Next \$500,000                 | 0.95%             |
| Next \$1,500,000               | 0.85%             |
| Next \$2,500,000               | 0.70%             |
| Next \$5,000,000               | 0.60%             |
| Next \$15,000,000              | 0.50%             |
| Assets Above \$25,000,000      | 0.45%             |

The initial fee is calculated based upon the fair market value when the account is established and prorated to the end of the current quarter. Thereafter, the fee is calculated quarterly in advance based upon the prior quarter-end account fair market values. Fees are prorated for cash flows greater than \$250,000 during each quarter. Fees may be prorated for the initial quarter.

Investment advisory fees are typically debited directly from client accounts. Clients receive a billing invoice that provides the agreed fee percentage, the portfolio value on which the fee is calculated, and the amount of the quarterly fee.

### **Compensation – Standalone Financial Planning**

For our standalone Financial Planning services, Clients will pay a fixed fee, depending upon the complexity of the client's overall financial situation and the estimated number of hours to complete. The Firm and the client agree upon fees prior to the engagement of our services. Fees are negotiable and are fully disclosed in the client agreement. Total costs for financial plans may range from \$3,500 to \$7,500 or higher. There is no "typical" plan, as services are customized to the particular needs of the client. An initial deposit equal to one-half of the agreed upon fee is payable at the time of entering into an agreement, with the remaining balance due upon presentation of a completed plan to the client.

### **Compensation – Future Ready Subscription-Based Financial Planning**

For our subscription-based Financial Planning services, Clients will be invoiced monthly, for a fixed fee of \$100, to be monthly, in arrears, until assets have accumulated over \$350,000 in assets; At which point, Clients will be eligible for our full-service investment management services, which includes full-scope financial planning. The fee for subscription-based financial planning services provides you with access to an advisor for advice on a number of topics, such



as, insurance, taxes, retirement needs, investments, estate planning, etc. A full projection, based on your goals, needs objectives, retirement needs, estate planning, etc., is available for an additional fee.

#### **Compensation – Future Ready Portfolio Management Wrap Fee Program**

For the Wrap Fee Program where we act as the Portfolio Manager only, Clients will pay a fee of 1.30%, based on the market value of assets in the account, to be billed monthly in arrears based on an average daily balance.

In addition to our fees, clients pay the broker-dealer an annual wrap fee program fee of up to 0.20% based upon the market value of assets in the account, collected quarterly in arrears based on an average daily balance.

#### **Compensation – Third-Party Asset Management Programs**

For Clients enrolled in a Third-Party Asset Management Program, fees will be calculated as one-fourth of the stated annualized percentage applied to the average daily market value held during the period, deducted directly from the Client's account quarterly, in arrears. These fees are separate and distinct from fees charges to you by us for our services and are paid directly to the Third-Party Asset Manager. Fees will be prorated for services provided during any period of less than three consecutive months.

Fees for these programs are as follows:

| <b>Strategy Name</b>           | <b>Minimum Account Size</b> | <b>Annual Third-Party Asset Management Fee</b> |
|--------------------------------|-----------------------------|--|
| Personalized DI All Cap SMA    | \$250,000                   | 0.28%  |
| Personalized DI Large Cap SMA  | \$100,000                   | 0.28%  |
| Personalized Large Cap SMA     | \$80,000                    | 0.40%  |
| Personalized Small/Mid Cap SMA | \$60,000                    | 0.50%  |
| Personalized International SMA | \$60,000                    | 0.45%  |
| Personalized Core Equity SMA   | \$500,000                   | 0.40%  |

#### **Advice on Matters Not Involving Securities**

We may also provide advice on issues which do not involve advice related to securities. Fees are billed at an hourly rate of \$150 - \$450 and are negotiable and agreed upon between the client and the Firm prior to the start of the project. Such matters include, but are not limited to the following: budgeting, mortgage, asset acquisition, credit management, planning for various life events, e.g., marriage, divorce, children, etc.

#### **Other Fees**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the

purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

### **Agreement Terms**

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

For financial planning engagements, once the process begins, a portion of the initial deposit may or may not be refunded, with determination based upon the time spent and services rendered by us up to the time of termination.

### **Cash Balances**

Some of your assets may be held as cash and remain uninvested. Holding a portion of your assets in cash and cash alternatives, i.e., money market fund shares, may be based on your desire to have an allocation to cash as an asset class, to support a phased market entrance strategy, to facilitate transaction execution, to have available funds for withdrawal needs or to pay fees or to provide for asset protection during periods of volatile market conditions. Your cash and cash equivalents will be subject to our investment advisory fees unless otherwise agreed upon. You may experience negative performance on the cash portion of your portfolio if the investment advisory fees charged are higher than the returns you receive from your cash.

### **General Information on Compensation and Other Fees**

In certain circumstances, fees, account minimums and payment terms are negotiable depending on client's unique situation – such as the size of the aggregate related party portfolio size, family holdings, low-cost basis securities, or certain passively advised investments and pre-existing relationships with clients. Certain clients may pay more or less than others depending on the amount of assets, type of portfolio, or the time involved, the degree of responsibility assumed, complexity of the engagement, special skills needed to solve problems, the application of experience and knowledge of the client's situation. Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

Our fees for non-wrap accounts 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, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Our fees for wrap accounts include brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. See disclosure in the Form ADV Part 2A Appendix 1 for more information.

Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive our services which are designed, among other things, to assist the client in determining which mutual funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by WGCA to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

We do not receive any portion of these commissions, fees, and costs.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

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Neither we, nor any of our employees accepts performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

We do not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

## Item 7: Types of Clients

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As described in Item 4, our clients include individuals, high net individuals and trusts.

### **Account Minimums**

We require a minimum account of \$500,000 for investment management services. At our exclusive discretion, we may grant waivers or exceptions from the minimum account requirement.

Clients who have less than \$350,00 in assets qualify for participation in our Future Ready Portfolio Management Wrap Fee Program and Subscription-Based Financial Planning services.

We may group certain related client accounts for the purposes of achieving the minimum account size.

Clients enrolled in a Third-Party Asset Management Program must have a minimum account size of \$60,000 - \$500,000, depending on the investment strategy selected.

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

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### **Methods of Analysis and Investment Strategies**

We may assist clients in formulating investment objectives and guidelines, and in writing investment policy statements. Client accounts are generally given an asset management questionnaire which assists in understanding the client's needs and risk tolerance levels to make portfolio recommendations for each client account.

The recommended portfolio asset mix is then determined that might best achieve the client's long-term risk/reward goals. We will recommend an appropriate asset allocation model from a defined selection of investments selected from a broad universe of opportunities, each consisting of a diversified mix of asset classes (each a "Model"). The investments that make up the asset allocation of the Models may be in the form of individual securities (stocks and bonds), separate accounts, mutual or exchange traded funds or private investment vehicles. Actual client portfolios may deviate from Our policy models because of factors such as individual preferences, legacy investment positions or rebalancing timing. Models and client portfolios undergo dynamic asset allocation and rebalancing as deemed necessary to maintain the stated objectives.

We use a combination of fundamental and quantitative research in formulating investment advice, both in determining an asset allocation as well as individual security selection. Individual security selection is primarily driven by combining internal and external research, and investments are approved by the members of the Investment Committee. The selection included in each model is expected to help the client achieve his or her investment objective.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Investment strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Before recommending external Portfolio Managers, we will conduct due diligence that it deems reasonable and appropriate based on the facts and circumstances applicable to each Portfolio Manager. When conducting due diligence, we will exercise our professional judgment. When conducting due diligence, and making an assessment regarding an investment, we will rely on the resources reasonably available.

We generally provide investment advice on Portfolio Managers that invest in a wide variety of U.S. and foreign investment products.

We reserve the right to advise clients on any other type of investment that it deems appropriate based on the client's stated goals and objectives. We may also provide advice on

any type of investment held in a client's portfolio at the inception of the advisory relationship or on any investment on which the client requests advice.

### **Risk of Loss**

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

**All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends and other distributions), and the loss of future earnings. Although we manage assets in a manner consistent with your investment objectives and risk tolerance, there can be no guarantee that our efforts will be successful. You should be prepared to bear the following risks of loss:**

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar today, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Cybersecurity Risk:** A breach in cyber security refers to both intentional and unintentional events that may cause an account to lose proprietary information, suffer

data corruption, or lose operational capacity. This in turn could cause an account to incur regulatory penalties, reputational damage, and additional compliance costs associated with corrective measures, and/or financial loss.

- **Pandemic Risk:** Large-scale outbreaks of infectious disease can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

#### **Investment Risk Associated with External Portfolio Managers**

The ability of the underlying Portfolio Managers to correctly assess the future course of price movements of stocks, bonds and other financial instruments and markets will significantly affect the success of a client account. There can be no assurance that we or External Portfolio Managers will accurately predict such movements.



## Item 9: Disciplinary Information

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our Firm or the integrity of our management. We have no legal or disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

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### **Financial Industry Activities – Broker-Dealers**

We are not registered as a broker-dealer, and none of our employees are registered representatives of a broker-dealer.

### **Financial Industry Activities – Futures and Commodities**

Neither we nor any of our employees is registered as (or associated with) a futures commissions merchant, commodity pool operator, or a commodity trading advisor.

### **Financial Industry Affiliations – Accountant or Accounting Firm**

Robert D. Len and Leonard S. Wolf are owners and officers of The Wolf Group (TWG), an accounting firm which provides tax planning advice and compliance services to individuals and business entities. Fees charged by TWG are separate and distinct from the advisory fees charged by us. Our clients are not obligated to use the services of TWG.

TWG has formed a wholly owned subsidiary called Wolf Group Business Services (WGBS.) WGBS is not currently operational; WGBS will provide corporate tax planning and compliance services to business entities with international interests. Robert D. Len and Leonard S. Wolf are the officers of WGBS.

### **Financial Industry Affiliations – Insurance Broker or Agent**

Our Investment Adviser Representatives (IARs) may be appointed with several insurance companies IAR's are able to receive separate compensation for referrals for policies implemented through various insurance companies, and/or commissions for the sale of traditional life and long-term care policies.

### **Other Investment Advisors**

As noted, above, we may recommend other investment advisers (Third-Party Asset Managers) to clients, but we do not receive compensation from those recommendations.

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

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Our employees must comply with a Code of Ethics (Code), which describes our high standard of business conduct, and fiduciary duty to our clients. The Code's key provisions include:

- Statement of General Principles
- Policy on and reporting of Personal Securities Transactions
- A prohibition on Insider Trading
- Restrictions on the acceptance of significant gifts
- Procedures to detect and deter misconduct and violations
- Requirement to maintain confidentiality of client information

April Turch, Chief Compliance Officer reviews all employee trades each quarter. These reviews ensure that personal trading does not affect the markets, and that our clients receive preferential treatment.

Our employees must acknowledge the terms of the Code of Ethics at least annually. Any individual not in compliance with the Code of Ethics may be subject to termination.

Clients and prospective clients can obtain a copy of Our Code of Ethics by contacting April Turch at (703) 502-9500.

The Wolf Group, the affiliated accounting firm, has a policy that it will not provide accounting or audit services for any publicly traded or private company that issues securities. This policy is to ensure that there are no potential conflicts of interest or misuse of information.

### **Participation or Interest in Client Transactions – Personal Securities Transactions**

We and our employees may buy or sell securities identical to those recommended to clients for their personal accounts. The Code of Ethics, described above, is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities, primarily mutual funds, have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Our clients. In addition, the Code requires pre-clearance of certain transactions. Employee trading is continually monitored under the Code of Ethics and designed to reasonably prevent conflicts of interest between the Firm and our clients.

### **Other Conflicts of Interest**

Directors, officers and employees have a duty to act in the best interests of our clients at all times. As part of this duty, directors, officers and employees are prohibited from engaging in any transaction which involves an improper conflict of interest.

A “conflict of interest” exists when a person’s private interests interfere in any way with our interests. A conflict situation can arise when a director, officer or employee takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest may also arise when a director, officer or employee, or members of his or her family, receives improper personal benefits as a result of his or her position in the Firm. Loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest.

It is almost always a conflict of interest for an employee to work simultaneously for a competitor, customer or supplier. Employees are not allowed to work for a competitor as a consultant or board member. Our policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf.

Conflicts of interest are prohibited unless they have been approved by the Firm. Wherever a conflict of interest arises, the employee involved must promptly disclose the circumstances of the conflict to the Chief Compliance Officer.

#### **Participation or Interest in Client Transactions – Material Financial Interest**

Neither we nor our employees recommend to clients or buy or sell for client accounts, securities in which they have a material financial interest.

#### **Participation or Interest in Client Transactions – Principal/Agency Cross**

It is our policy that we will not affect any principal or agency cross securities transactions for client accounts.

## Item 12: Brokerage Practices

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### **Research and Other Soft Dollar Benefits**

We do not receive formal soft dollar benefits other than execution from broker/dealers in connection with client securities transactions. See disclosure below in “Directed Brokerage – Other Economic Benefits.”

### **Brokerage for Client Referrals**

We do not receive client referrals from broker/dealers.

### **Client Directed Brokerage**

While not routine, the client may direct us to use a particular broker-dealer to execute some or all transactions for the client. This brokerage direction must be requested by the client in writing. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to “batch” client transactions for execution through other broker-dealers with orders for other accounts managed by WGC. By directing brokerage, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Not all advisers require or allow their clients to direct brokerage. Subject to our duty of best execution, we may decline a client’s request to direct brokerage if, in Our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

If the client requests that we arrange for the execution of securities brokerage transactions for the client’s account, we shall direct such transactions through broker-dealers that we reasonably believe will provide best execution. We periodically and systematically review our policies and procedures regarding recommending broker-dealers to our client in light of our duty to obtain best execution.

### **WGC Brokerage Selection and Economic Benefits**

We generally recommend either TD Ameritrade, a division of TD Ameritrade, Inc. or Schwab Institutional, both members FINRA/SIPC (Selected Broker/Dealers). Each firm is a widely recognized independent, and unaffiliated FINRA member broker-dealer. Selected Broker/Dealers offer independent investment advisers program services which include custody of securities, trade execution, clearance and settlement of transactions.

The primary factors considered in our decision to recommend Selected Broker/Dealers include financial strength and the quality of the products and services it offers to clients.

We have determined that the Selected Broker/Dealers currently offer the best overall value to us and our clients for the customer service, brokerage, research services and technology they provide. We believe these qualities make these firms superior to most non-service oriented, deep-discount and internet/web-based brokers that may otherwise be available to the public.

We receive economic benefits from each Selected Broker/Dealer, which include the following products and services (provided without cost or at a discount): receipt of a duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading ( which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to WGCA by third party vendors.

Some of the products and services made available by Selected Broker/Dealers may benefit us but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at Selected Broker/Dealers. Other services made available by Selected Broker/Dealers are intended to help us manage and further develop our business enterprise. The benefits received by us, or our employees do not depend on the amount of brokerage transactions directed to Selected Broker/Dealers. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our Firm and our employees in and of itself creates a potential conflict of interest and may indirectly influence our choice of Selected Broker/Dealers for custody and brokerage services.

A client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where we determine, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. While we will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

#### **Directed Brokerage – Wrap Fee Programs**

As disclosed in Item 4, clients may participate in the Separate Account Strategy Wrap Program. For Wrap Fee accounts, we receive investment advisory fees, which cover both investment advice and transaction costs. More detail on the Program may be found in Form ADV Part 2A Appendix 1.

Transactions are affected net, i.e., without commission and a portion of the investment advisory fee is generally considered to be in lieu of commissions. Trades are generally expected to be executed only with the Selected Broker/Dealer with which the client has entered into the wrap fee arrangement.

We may not, therefore, be free to seek best price and execution by placing transactions with other broker dealers. Our experience indicates that certain broker dealers under clients' wrap fee agreements generally offer best price for transactions in listed equity securities, but no assurance can be given that such will continue to be the case with those or other broker dealers which may offer wrap fee arrangements, nor with respect to transactions in other types of securities. The client may wish to ensure that the broker dealer offering the wrap-fee arrangement can provide adequate price and execution of most or all transactions. The client should also consider that depending on the wrap-fee charged by the broker dealer, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided under the arrangement, and other factors, the wrap-fee may or may not exceed the aggregate cost of such services were they to be provided separately and if we were free to negotiate commissions and seek best price and execution of transactions for the client's account.

### **Trade Aggregation**

Trade aggregation is the act of trading a large block of a security in a single order. Shares of a purchased security are then allocated to the appropriate accounts in the appropriate proportion. The main purposes of order aggregation are (i) for ease of trading and (ii) to obtain a lower transaction cost associated with trading a larger quantity.

We may block trades, the purchase or sale of a security from a client's portfolio if a reason to purchase or sell the security from all client portfolios at the same time presents itself.

As a result of not typically aggregating trades, clients purchasing securities around the same time may receive a less favorable price than other clients. In addition, not aggregating trades may result in higher transaction costs, as a client will not benefit from lower transaction cost which might be achieved if the trade was aggregated.

Accounts for our Firm or our employees will not be included in a block trade with client accounts.

## Item 13: Review of Accounts

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Our Investment Policy Committee is comprised of Robert D. Len, Managing Director, Charles K. Verruggio, Chief Investment Officer and Senior Financial Advisor, Sean Fitzgerald, Associate Operations Manager, and Cesar Ortega, Associate Portfolio Manager. The Committee meets regularly to discuss overall firm investment philosophy to consistently apply to client accounts, regardless of the client service manager. Our Investment Policy Committee evaluates our global Client holdings at least twice a year, updating our models and re-balancing Client accounts, as necessary.

Each client is assigned a client service manager. The client service manager has the responsibility for communicating with the client, updating changes to the client's situation and regularly reviewing the client's portfolio including the asset allocation and the specific assets included in the account. The client review includes comparing the portfolio with the goals and objectives as outlined by the investment policy statement, reviewing changes to the client's investment circumstances, evaluating the specific holdings, re-balancing the portfolio and communicating the current status of the portfolio and any recommended actions to the client.

### **Review Triggers**

Other conditions that may trigger a detailed review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's personal situation.

### **Reporting**

Each month, the custodian provides clients with an account statement for each client account, which includes individual holdings, deposits and withdrawals, accrued income, dividends, and performance. In addition, the custodian provides clients with trade confirmations for each position bought and sold.

### **Financial Planning – Reviews and Reporting**

The initial financial plan is included as a component of the financial planning service. Clients may receive updated financial plans for a separate fee.



## Item 14: Client Referrals and Other Compensation

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### **Other Compensation**

We do not receive any formal economic benefits (other than normal compensation) from any firm or individual for providing investment advice.

### **Other Compensation – Brokerage Arrangements**

See disclosure in Item 12 regarding compensation, including economic benefits received in connection with giving advice to clients.

### **Compensation – Client Referrals – Solicitation Arrangement**

We pay cash referral fees to independent, unaffiliated companies (“Solicitor”(s), “Promoter”(s)) who refer prospective clients to the Firm. The referral fees represent a share of the investment advisory fee charged by us to our clients, but do not result in higher costs to you. There will be a written agreement between us and the Solicitor, which clearly defines the duties and responsibilities of the solicitor under this arrangement. In addition, each Solicitor is required to provide a written disclosure document, which explains to the prospective client the terms under which the Solicitor is working with us and the fact that the Solicitor is being compensated for the referral activities. The Solicitor is also required to furnish a copy of our Form ADV Part 2 to the prospective client and obtain a written acknowledgement from the client that both the Solicitor's/Promoter's and our disclosure documents have been received.

## Item 15: Custody

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### **Custody – Fee Debiting**

The client agreement authorizes us to deduct advisory fees directly from the client's account at the custodian. We send the amount of the quarterly fee to the custodian. With the exception of the ability to debit client accounts for advisory fees, we do not and will not have custody of clients' funds or securities. Client assets shall be held in the custody of a bank, trust company or brokerage firm agreed upon by the client and WGCA.

The custodian is advised in writing of the limitation of Our access to the account. The custodian sends a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of advisory fees paid directly to the Firm.

### **Custody – First Party Money Transfers**

Clients may provide us with written ongoing authorization to wire money between the client's accounts held with the qualified custodian directly to an outside financial institution (i.e., a client's bank account). A copy of this authorization is provided to the qualified custodian. The authorization includes the client's name and account number(s) at the outside financial institution(s) as required.

### **Custody – Third Party Money Transfers**

Clients may provide us with a standing letter of authorization (or similar asset transfer authorization) which allows us to disburse funds on behalf of clients to third parties. We ensure that the following conditions are in place when we are deemed to have custody via third party money movement:

1. The client provides a Written Authorization to the custodian that includes all appropriate information as to how the transfer should be directed;
2. The Written Authorization includes instruction to direct transfers to the third party either on a specified schedule or from time to time;
3. Appropriate verification is performed by the custodian, along with a transfer of funds notice to the client promptly after each transfer;
4. The client may terminate or change the instruction to the custodian;
5. We have no authority or ability to designate or change any information about the third party contained in the instruction;
6. We maintain records showing that the third party is not a related party of the Firm or located at the same address as ours; and
7. The custodian sends the client a written initial notice confirming the instruction and an annual written confirmation thereafter.

### **Custody – Account Statements**

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets.

Clients are urged to carefully review such statements and compare such official custodial records to the reports that we provide. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16: Investment Discretion

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We may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows us to execute trades on behalf of our clients.

When such limited powers exist between our Firm and our client, we have the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, we may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions placed on accounts must be presented to us in writing.

If we have not been given discretionary authority, we consult with the client prior to each trade.

## **Item 17: Voting Client Securities**

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We do not have any authority to and does not vote proxies on behalf of clients. Clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios.

If requested, we may provide advice to clients regarding proxy votes. If any conflict of interest exists, it will be disclosed to the client. Clients may contact April Turch, Chief Compliance Officer, at (703) 502-9500 for information about proxy voting.

## Item 18: Financial Information

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We do not require prepayment of fees of both more than \$1,200 per client, **and** more than six months in advance; and therefore, is not required to provide a balance sheet to clients.

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

**Wolf Group Capital Advisors**  
**Form ADV Part 2B**  
**Investment Adviser Brochure Supplement**

12701 Fair Lakes Circle, Suite 220  
Fairfax, VA 22033  
(703) 502-9500  
[aturch@wolfgroupcapital.com](mailto:aturch@wolfgroupcapital.com)  
[www.wolfgroupcapital.com](http://www.wolfgroupcapital.com)

**Supervisor's Name: April Turch**

**Supervisor of:**  
Robert D. Len  
Leonard S. Wolf  
Charles K. Verruggio  
Catherine Lee  
April Turch  
Kevin R. Ostergaard  
Sean W. Fitzgerald  
Cesar A. Ortega  
Dylan T. Farnella

September 2022

This Brochure Supplement provides information about the Firm's ("we," "us," "our") employees that supplements our Brochure. You should have received a copy of that Brochure. Please contact April Turch, Chief Compliance Officer, at (703) 502-9500 or [aturch@wolfgroupcapital.com](mailto:aturch@wolfgroupcapital.com) if you did not receive our Brochure or if you have any questions about the contents of this Supplement.

Additional information about our employee(s) referenced above is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You may search this site using a unique identifying number, known as a CRD number for each employee.

## Item 2: Educational Background and Business Experience

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### **Education and Business Background**

We require that portfolio managers, financial planners, and persons associated with our Firm involved in providing investment advice to clients possess, minimally, a college degree and appropriate business experience. Investment adviser representatives must be properly licensed and registered in the appropriate jurisdictions. Continuing education in the employee's field of expertise is encouraged. Employees are required to have exemplary personal and regulatory backgrounds and read and uphold our policies and procedures.

### **Supervised Persons**

***Robert D. Len***

Born 1963

**CRD #: 2847676**

### **Business Background:**

Wolf Group Capital Advisors  
Managing Director

1996 to Present

The Wolf Group, PC  
Director

1988 to Present

### **Formal Education after High School:**

University of Virginia, McIntire School of Commerce  
Bachelor of Science in Commerce and Accounting

Georgetown University  
Master of Science, Taxation

### **Professional Designations:**

Certified Public Accountant/Personal Financial Specialist (CPA/PFS)

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***Leonard S. Wolf***

Born 1955

**CRD #: 2843340**

### **Business Background:**

Wolf Group Capital Advisors  
Director

1996 to Present

The Wolf Group, PC  
Managing Director

1983 to Present

### **Formal Education after High School:**

Pennsylvania State University



Bachelor of Science, Accounting

**Professional Designations:**

Certified Public Accountant (CPA)

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***Charles K. Verruggio***

Born 1978

**CRD #: 4203594**

**Business Background:**

Wolf Group Capital Advisors

2020 to Present

Chief Investment Officer and Senior Financial Advisor

Wolf Group Capital Advisors

2012 to 2020

Vice President and Financial Advisor

Allegheny Financial Group

2010 to 2012

Financial Analyst

**Formal Education after High School:**

University of Pittsburgh

Bachelor of Science, Psychology and Business

Carnegie Mellon University

Master of Business Administration, Finance and Accounting

**Professional Designations:**

N/A

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***Catherine Lee***

Born 1970

**CRD #: 3115712**

**Business Background:**

Wolf Group Capital Advisors

2018 to Present

Chief Operating Officer

Stena AB

Strategy Advisor, Stena Rederi

2018 to 2022

Business Development Director, Stena Rederi

2016 to 2018

Change Director, Stena Line

2015 to 2016

Self-Employed

Strategy Consultant and Leadership Coach

2012 to Present

**Formal Education after High School:**

Columbia University  
Master of International Affairs, International Finance and Business

Middlebury College  
Bachelor of Arts, International Politics and Economics

**Professional Designations:**

N/A

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***April Turch***  
**CRD #: 3233895**

Born 1972

**Business Background:**

Wolf Group Capital Advisors  
Chief Compliance Officer

2015 to Present

Focus Wealth Management, LTD  
Director of Operations

2011 to 2015

**Formal Education after High School:**

George Mason University  
Bachelor of Science, Finance

Georgetown University  
Certificate, Financial Planning

**Professional Designations:**

N/A

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***Kevin R. Ostergaard***  
**CRD #: 6375261**

Born 1991

**Business Background:**

Wolf Group Capital Advisors  
Financial Advisor

2021 to Present

Wolf Group Capital Advisors  
Associate Financial Advisor

2019 to Present

Edelman Financial Services  
Financial Planning Analyst

2016 to 2019

Financial Advantage Associates

2014 to 2016

Financial Advisor

**Formal Education after High School:**

University of Maryland

Bachelor of Arts, Economics

Georgetown University

Certificate, Financial Planning

**Professional Designations:**

CERTIFIED FINANCIAL PLANNER™ (CFP®)

Chartered Financial Consultant (ChFC)

Certified Investment Management Analyst (CIMA)

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***Sean W. Fitzgerald***

Born 1986

**CRD #: 5699967**

**Business Background:**

Wolf Group Capital Advisors

Client Service and Operations Manager

2022 to Present

Associate Operations Manager

2017 to 2022

JP Morgan Chase

2014 to 2016

Associate

Morgan Stanley

2009 to 2014

Analyst/Associate

**Formal Education after High School:**

Loyola University Maryland

Bachelor of Arts, Business and International Studies

**Professional Designations:**

N/A

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***Cesar A. Ortega***

Born 1994

**CRD #: 6600159**

**Business Background:**

Wolf Group Capital Advisors

2020 to Present

Associate Portfolio Manager

Wade Financial Advisory

2019 to 2020

Portfolio Management Associate

|                                     |              |
|-------------------------------------|--------------|
| Cresta Advisors<br>Client Associate | 2017 to 2019 |
|-------------------------------------|--------------|

**Formal Education after High School:**

Texas A&M University  
Bachelor of Business Administration, Finance

**Professional Designations:**

N/A

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***Dylan T. Farnella***

Born 1997

**CRD #: 6960196**

**Business Background:**

Wolf Group Capital Advisors  
Associate Financial Advisor

2022 to Present

Equitable Advisors, LLC  
Financial Advisor, Insurance Agent

2019 to 2022

Wealth Management Intern

Potamac Abatement, Inc.  
Accounting Assistant

2019 to 2019

Axa Advisors, LLC/Omar Jennings  
Salesforce Intern

2018 to 2018

**Formal Education after High School:**

High Point University  
Bachelor of Science in Political Science and Economics

**Professional Designations:**

N/A

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**Professional Certifications**

Our Supervised Persons maintain professional designations, which required the following minimum requirements:

***Certified Financial Planner™ (CFP®)***

|                  |  |
|------------------|--|
| <b>Issued By</b> | Certified Financial Planner Board of Standards, Inc. |
|------------------|--|

|                      |   |
|----------------------|---|
| <b>Prerequisites</b> | Candidate must meet the following requirements: |
|----------------------|---|

|  |   |
|--|---|
|  | <ul style="list-style-type: none"> <li>• A bachelor's degree (or higher) from an accredited college or university, and</li> <li>• 3 years of full-time personal financial planning experience</li> </ul>  |
| <b>Education Requirements</b>            | <p>Candidate must complete a CFP®-board registered program, or hold one of the following:</p> <ul style="list-style-type: none"> <li>• CPA</li> <li>• ChFC</li> <li>• Chartered Life Underwriter (CLU)</li> <li>• CFA</li> <li>• Ph.D. in business or economics</li> <li>• Doctor of Business Administration</li> <li>• Attorney's License</li> </ul> |
| <b>Exam Type</b>                         | CFP® Certification Examination  |
| <b>Continuing Education Requirements</b> | 30 hours every 2 years  |

### ***Chartered Financial Consultant (ChFC)***

|  |   |
|--|---|
| <b>Issued By</b>                         | The American College  |
| <b>Prerequisites</b>                     | <p>Candidate must meet the following requirements:</p> <ul style="list-style-type: none"> <li>• 3 years of full-time business experience within the five years preceding the awarding of the designation</li> </ul> |
| <b>Education Requirements</b>            | 6 core and 2 elective courses   |
| <b>Exam Type</b>                         | Final proctored exam for each course  |
| <b>Continuing Education Requirements</b> | 30 CE credits every 2 years   |

### ***Certified Investment Management Analyst (CIMA)***

|  |   |
|--|---|
| <b>Issued By</b>                         | Investment Management Consultants Association (IMCA)  |
| <b>Prerequisites</b>                     | <p>Candidate must meet the following requirements:</p> <ul style="list-style-type: none"> <li>• 3 years of full-time financial services experience</li> <li>• Pass Qualification Examination</li> <li>• Schedule into and complete education program with Registered Education Provider</li> <li>• Pass online Certification Examination</li> <li>• Sign licensing agreement and agree to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks</li> </ul> |
| <b>Education Requirements</b>            | Schedule into and complete education program with Registered Education Provider   |
| <b>Exam Type</b>                         | Qualification and Certification Examinations  |
| <b>Continuing Education Requirements</b> | 40 hours every 2 years, including 2 ethics hours  |

### ***Certified Public Accountant (CPA)***

|  |   |
|--|---|
| <b>Issued By</b>                         | State Boards of Accountancy   |
| <b>Prerequisites</b>                     | Candidate must meet the following requirements: <ul style="list-style-type: none"><li>• Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);</li><li>• Successful passing of the Uniform CPA Examination</li></ul> |
| <b>Education Requirements</b>            | At minimum, a college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting)   |
| <b>Exam Type</b>                         | Uniform CPA Examination   |
| <b>Continuing Education Requirements</b> | Completion of 40 hours of continuing professional education each year (or 80 hours over a two-year period) in order to maintain a CPA license   |

### ***Personal Financial Specialist (PFS)***

|  |   |
|--|---|
| <b>Issued By</b>                         | American Institute of Certified Public Accountants (AICPA)  |
| <b>Prerequisites</b>                     | Candidate must meet the following requirements: <ul style="list-style-type: none"><li>• Must hold an unrevoked CPA license;</li><li>• Fulfill 3,000 hours of personal financial planning business experience;</li><li>• Complete 80 hours of personal financial planning continuing professional education credits;</li><li>• Pass a comprehensive financial planning exam (PFS Exam); and</li><li>• Be an active member of the AICPA</li></ul> |
| <b>Education Requirements</b>            | Must meet minimum education requirements for CPA.   |
| <b>Exam Type</b>                         | PFS Exam  |
| <b>Continuing Education Requirements</b> | Completion of 60 hours of financial planning continuing professional education credits every three years  |

## **Item 3: Disciplinary Information**

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Neither we nor any of our employees have been involved in any activities resulting in a disciplinary disclosure.

## **Item 4: Other Business Activities**

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Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above. These Outside Business Activities do not create a material conflict of interest with clients.

As disclosed in Form ADV Part 2A Item 5 – Fees and Compensation, neither we nor any of our employees receive commissions, bonuses or other compensation based on the sale of securities. However, we may receive compensation from various insurance companies for policies implemented through client referrals.

As disclosed in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations, Robert D. Len and Leonard S. Wolf are owners and officers of The Wolf Group (TWG), an accounting firm which provides tax planning advice and compliance services to individuals and business entities. Fees charged by TWG are separate and distinct from the advisory fees charged by our Firm. Our clients are not obligated to use the services of TWG.

TWG has formed a wholly owned subsidiary called Wolf Group Business Services (WGBS.) WGBS is not currently operational; WGBS will provide corporate tax planning and compliance services to business entities with international interests. Robert D. Len and Leonard S. Wolf are the officers of WGBS.

As disclosed in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations, Our Investment Adviser Representatives (IARs) may be appointed with several insurance companies IAR's are able to receive separate compensation for referrals for policies implemented through various insurance companies, and/or commissions for the sale of traditional life and long-term care policies.

## **Item 5: Additional Compensation**

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No employees receive any economic benefit outside of regular salaries or bonuses related to amount of sales, client referrals or new accounts.

## **Item 6: Supervision**

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Robert D. Len, Managing Director and April Turch, Chief Compliance Officer are responsible for supervising our advisory activities and managing our team of Supervised Persons. Supervision is done by holding regular staff, investment, and other ad hoc meetings. Robert D. Len and April Turch regularly review client reports, emails, and trading, as well as employees' personal securities transaction and holdings reports.

Robert D. Len and April Turch can be reached at (703) 502-9500.