

# West Advisors, Incorporated

Item 1  
Cover Page of Form ADV Part 2  
Firm Brochure  
Part 2B Supplement Attached

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This brochure provides information about the qualifications and business practices of West Advisors, Incorporated. In this brochure, when we say “we”, “our” or “us”, we mean West Advisors, Incorporated. Any time we refer to ourselves as a “registered investment adviser” or indicate that we are “registered”, it does not imply a certain level of skill or training.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. You can obtain additional information about us on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our identification number (CRD #) with the SEC is 157236.

If you have any questions about the contents of this brochure, please contact us.

## **Item 2: Summary of Material Changes**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

During the first quarter of 2023, we hired independent consultant, Susan E. Mitchell, (“Sue”) to handle regulatory compliance items. She has over 35 years of experience in the financial industry and has served as chief compliance officer to firms in the Midwest. As an independent consultant, Sue provides similar services to other registered investment advisory firms in the Midwest.

We suggest that you read all of this document. If you have any questions about the information in this brochure, please contact us.

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## **Item 4: Advisory Business**

### **Our Firm**

David West, CFA, MBA formed West Advisors, Incorporated in 2003. Our firm became a registered investment advisor in 2011. David West is the sole owner of West Advisors, Inc.

### **Our Advisory Services**

We will meet with a prospective client to discuss their circumstances, their needs and which of our services they might want to use before we agree to provide advisory services for a client.

We use a written agreement with each client to define the type and scope of advisory services we will provide, to specify our fees for those services and to define other important terms of our advisory services. Either we or our client may terminate our agreement at any time without penalty by providing written notice to the other party.

In our advisory service agreements we specify that we act as a fiduciary to our client. As a fiduciary, we are legally required to put our client's interest ahead of our own.

We offer the following advisory services to clients:

1. Personal Financial Consulting – We provide consulting services to help our clients:
  - a Define their financial goals
  - b Understand their present financial circumstances
  - c Evaluate the likelihood their present course of action will meet their future goals
  - d Identify different courses of action to improve the likelihood they will meet their future goals

Financial consulting involves making assumptions about a client's future investment returns and future cash flows in order to simulate a client's future financial situation. A financial plan cannot predict the future and does not guarantee any particular future financial result. This inherent limitation of personal financial planning is discussed thoroughly with each client.

Our personal financial consulting service generally consists of the following components, although we will modify these services to fit the needs and requests of a client:

- A. *Gather Client Data and Help the Client Define their Goals* – Our clients will specify the financial issues they would like us to analyze. Generally, those financial issues include:
  1. Net worth
  2. Annual cash flow
  3. Expected spending needs
  4. Retirement needs and abilities
  5. Comparison of current and suggested investment asset allocation, based on the client's investment and risk profile

6. Projection of client's simulated cash flow over client's chosen time horizon under varying scenarios, showing, the sensitivity of the projection to the differing inputs.

*B. Define Responsibilities for Implementing and Monitoring the Investment Plan* – Generally, we assume the responsibility for implementing and monitoring their investment plan, although the client may retain specified implementation or monitoring responsibilities.

2. *Discretionary Investment Management* – In this advisory service, we manage our client's specified investment accounts according to our client's specified investment objectives. We can manage investment accounts a client may hold in various capacities – for example, as account owner, as a participant in an employer sponsored retirement plan, as an IRA owner, as a personal representative of an estate, as a custodian for a uniform transfer to minor account, or in instances where a client is a trustee of a trust.

As of December 31, 2022, we were providing discretionary investment management to one (1) client and our client assets under management were approximately three hundred seventy-six thousand, six hundred seventy-two dollars (\$376,672).

Our discretionary investment management service generally consists of the following components, although we will modify these services to fit the needs and requests of a client.

- a. *Develop an Investment Strategy*- We work with our client to develop a strategic mix of assets based on our client's investment objectives, personal circumstances, risk tolerance and any restrictions our client has placed on allowable investments.
- b. *Develop an Investment Policy Statement* – At client's request, we expand our client's Investment Strategy into a written investment policy statement that will specify more exhaustively how the client's funds are to be invested and what limitations we must follow when we invest the client's funds. Policy statements further specify market-based benchmarks against which individual investment managers or vehicles will be measured, as well as total portfolio benchmarks.
- c. *Recommend a Custodian and Broker* – We will recommend a custodian to hold our client's investment accounts and we will recommend a broker to execute security transactions for our client. Our clients are not obligated to accept our recommendation of a custodian or broker. In our investment management agreement with each client, the client will either direct us to use our recommended custodian and broker or the client will otherwise specify the custodian and broker we must use. Please see Item 12 – Brokerage Practices, and Item 15 – Custody, for additional information.
- d. *Exercise Discretionary Investment Management* – We will invest our client's investment funds using our own discretion and manage the funds on a continuous and regular basis, but subject to the guidelines specified by the client.

- e. Review Investment Accounts – We will formally review our clients’ investment accounts on a monthly basis for existing clients, at the time we begin managing funds for a new client, upon request of a client, or when we consider it necessary to do so because of market or other circumstances. Please see Item – 8 Methods of Analysis, Investment Strategies and Risk of Loss and Item 13 – Review of Accounts, where we further describe our review.
  - f. Report on Investment Accounts – We issue a written report on our client’s investment accounts each calendar quarter. We deliver this report to clients in a digital or paper format depending on the client’s preference.
3. *Non-Discretionary Investment Management* – In this advisory service, we provide advice to our clients on their specified investment accounts according to our client’s specified investment objectives. We can provide advice on investment accounts a client may hold in various capacities – for example, as account owner, as a participant in an employer sponsored retirement plan, as an IRA owner, as a personal representative of an estate, as a custodian for a uniform transfer to minor account, or as trustee of a trust.

As of December 31, 2022, we were providing non-discretionary investment management to thirteen (13) clients and our client assets under management were approximately four hundred thirty-seven million, one hundred seventy seven thousand, and nine hundred ninety-six dollars (\$437,177.996).

Our non-discretionary investment management service generally consists of the following components, although we will modify these services to fit the needs and requests of a client:

- a. Develop an Investment Strategy - We work with our client to develop a strategic mix of assets based on our client’s investment objectives, personal circumstances, risk tolerance and any restrictions our client has placed on allowable investments.
- b. Develop an Investment Policy Statement – At client’s request, we expand our client’s Investment Strategy into a written investment policy statement that will specify more exhaustively how the client’s funds are to be invested and what limitations we must follow when we invest the client’s funds. Policy statements further specify market-based benchmarks against which individual investment managers or investment vehicles will be measured, as well as total portfolio benchmarks. Policy statements may further contain additional criteria used in evaluating existing or prospective investment managers or investment vehicles, including but not limited to fees, key professional tenure, transparency, and sustainability of investment process.
- c. Recommend a Custodian and Broker – We will recommend a custodian to hold our client’s investment accounts and we will recommend a broker to execute security transactions for our client. Our clients are not obligated to accept our recommendation of a custodian or broker. In our investment management agreement with each client, the client will either direct us to use our recommended custodian and broker or the

client will otherwise specify the custodian and broker we must use. Please see Item 12 – Brokerage Practices, and Item 15 – Custody, for additional information.

- d. **Exercise Non-Discretionary Investment Management** – We will actively monitor our client’s investment funds and provide our clients with recommendations regarding their investment funds. Funds are monitored on a continuous and regular basis. We review and recommend investment vehicles. Our firm receives no referral fees, in part or in whole, from other investment advisers or vehicles we recommend.
  - e. **Review Investment Accounts** – We will formally review our clients’ investment accounts on a monthly basis for existing clients, at the time we begin managing funds for a new client, upon request of a client, or when we consider it necessary to do so because of market or other circumstances. Please see Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss and Item 13 – Review of Accounts, where we further describe our review.
  - f. **Report on Investment Accounts** – We issue a written report on our client’s investment accounts each calendar quarter. We deliver this report to clients in a digital or paper format depending on the client’s preference.
4. **Other Advisory Services** – Our clients may request advisory services other than personal financial consulting or discretionary or non-discretionary management, and we work with clients to tailor advisory services to fit their needs. As examples, we offer the following services to clients:
- a. *One Time or Periodic Investment Advice* – We provide investment advice or analysis to address a specific client request, such as to review investments held in a specific investment account when we are not providing discretionary investment management for the account.
  - b. *Review of Investment Offerings in an Employer Sponsored Retirement Plan* – An employer can retain us to evaluate the investment offerings in the retirement plan sponsored by the employer, and to recommend changes in the plan’s investment offerings.

### **Non-Advisory Services**

We offer certain non-advisory services to our clients, as follows:

- 1. *Estate Planning Project Management* – We facilitate interaction between our clients and their Estate Planning advisors and attorneys such that the investment plan and the estate plan work as an integrated whole.
- 2. *Accounting and Bill Payment* – We provide accounting services and bill payment services for business and/or charitable enterprises affiliated with our clients, including the preparation of data for the completion of tax returns.

Our advisory service clients are not required to utilize any of our non-advisory service offerings.

**Wrap-Fee Program**

We do not participate in or sponsor any wrap-fee program.

**Item 5: Fees and Compensation****Fee Only Adviser**

We are a “fee-only” investment adviser. Our only source of compensation for advisory services is the fee we charge our clients. We do not accept commissions, sales loads or other compensation from any third party.

**Fee Arrangements**

We bill our clients for our services as described, below:

1. *Discretionary and Non-Discretionary Investment Management* – Our fee for our discretionary investment management service is an annual flat fee rate paid quarterly, negotiated with the client at the inception of the relationship and as revised by mutual agreement upon an annual review.
  - a. *Quarterly Billing* – We bill for our investment management service in arrears at the end of each calendar quarter based on the annual flat fee rate negotiated and agreed upon in advance by the client. Periods less than one quarter are pro-rated on a daily basis. We do not require clients to prepay our fee. Clients are invoiced for fees. Our firm does not withdraw assets from Client accounts to pay fees.
2. *Fees Charged by Third Parties* – Clients will pay fees to third parties in addition to paying our fee described above. These third-party fees may include some or all of the following:
  - a. The custodian selected by the client may charge a fee for its custodial services.
  - b. The broker selected by the client will charge a commission for its brokerage services or will make a markup on the price of a security when the broker executes transactions in the client’s account. See Item 12 – Brokerage Practices.
  - c. When the client holds mutual funds or exchange traded funds in their account, the mutual fund or exchange traded fund will charge a fee to all shareholders of the fund, including our client. The fees charged by the mutual fund or exchange traded fund will be described in the prospectus for the fund. The fees would generally be comprised of a management fee, an operations fee and possibly a distribution fee. We routinely use no-load mutual funds. However, in extraordinary circumstances we may recommend a mutual fund which imposes a sales charge, and in that case our client may pay an initial or deferred sales charge – but we do not receive any part of that sales charge. We are a fiduciary to our clients, and therefore we make all reasonable attempts to minimize the cost of investing for our clients. We regularly review the fees charged by mutual funds and exchange traded funds and we consider the tradeoff between expected investment return and a fund’s fees when we make investment decisions for clients.
3. *Ad-hoc Consulting/Services* - We charge clients for consulting services not otherwise incorporated under the terms of Discretionary or Non-Discretionary Investment



Management services (above) either on a flat fee basis negotiated in advance or based on the time we incur to provide that service at our standard hourly rate for the staff member providing the service, as agreed upon by us and client as appropriate.

As of December 31, 2022, our standard hourly rates for our professional staff was \$50 per hour for non-investment related ad-hoc services and \$100 per hour for investment related ad-hoc services. Our fee is due at the completion of the assignment to the client's satisfaction. Our firm does not withdraw assets from Client accounts to pay fees.

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

We do not charge or accept any performance-based fees – fees based on the capital gains or on the capital appreciation of the assets in a client's investment accounts. Accordingly, we do not engage in side-by-side account management.

## **Item 7: Types of Clients**

We provide our advisory services for individuals, high net worth individuals, married couples, trusts, qualified retirement plans, and tax- exempt organizations.

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

Our investment process typically follows the following steps:

1. *Determine the Client's Investment Objective and Risk Tolerance* – When we first begin to work with a client, we meet with our client to define the client's financial needs and to define the client's investment objective for the funds that we will manage as well as the level of risk our client is willing to accept. We further assess our client's investment knowledge and experience.
2. *Develop a Target Asset Allocation* – We develop a Strategic Asset Allocation for our client and a Strategic Benchmark that reflects that asset allocation. The purpose of a target asset allocation is to select a group of investments (asset classes) whose combination maximizes the expected return of a portfolio for a given level of risk (changes in market value) over the client's investing time horizon. This process is based on the principles of Modern Portfolio Theory. Additionally, assets are structured so as to be sensitive to issues of taxation, such that tax-intensive assets or assets that trade frequently are preferred to be held in tax-exempt accounts while tax-efficient assets are emphasized in taxable accounts.
3. *Develop a Statement of Investment Policy* – At a client's request, we develop a written investment policy statement for our client that states our client's investment objectives, personal circumstances, risk tolerance and any restrictions our client has placed on allowable investments. The investment policy statement then provides guidance as to how the client's assets are to be invested. The Statement of Investment Policy will include the Client's Target

Asset Allocation but has a larger scope, up to including investment benchmarks and risk limits within sub-portfolios of the client's aggregate portfolio.

4. *Modify Asset Class Weightings Given Current Market and/or Client Conditions* – We believe that securities markets are largely efficient over the long term, but that markets are not always rational – a variety of factors can cause classes of assets to be priced at levels beyond what we and other market observers and analysts believe offer a “fair” prospect of return for the level of risk assumed. We underweight the asset classes that appear to provide unattractive after-tax return/risk profiles. Furthermore, client specific factors may cause deviations from Strategy Weights (e.g. anticipated future funding of large cash gifts may cause the accretion of cash holdings beyond Strategic Weights in the months preceding the outflow). We then use the modified asset class weightings in our initial asset purchases for new clients and when we rebalance existing client accounts in our account review process each quarter.
5. *Select Vehicles for Asset Classes* – We recommend vehicles for the asset classes in our clients' portfolios as follows:
  - a. *Passive Investment Vehicles* – we frequently recommend passive management for asset classes in our clients' portfolios that are characterized by high efficiency. Investment advisors are sometimes recommended where an additional overlay of service, such as tax-loss harvesting, can be implemented efficiently. For smaller portfolios, mutual funds, ETFs, or closed end funds may also be used.
  - b. *Active Managers* – We may recommend active investment managers for our clients' portfolios for asset classes in our clients' portfolios that are characterized by lower efficiency. Separate accounts may be used where client size warrants establishing those relationships. We may also recommend mutual funds, ETFs, and/or closed end funds with active management of the underlying assets where client size does not justify separate account management.
  - c. *Individual Securities* – We buy, hold or recommend for disposal securities in a limited capacity as follows:
    - i. *Bonds* – We may buy or recommend for purchase individual bonds which are issued by the US Treasury for the purpose of short-term investment of cash balances. Such securities typically have less than one year to maturity. In connection with other investment advisors also retained by our firm's clients, we may also make a concurrent recommendation regarding fixed income securities denominated in currencies other than US Dollars.
    - ii. *Stocks* – Our firm's activity with respect to the equity securities of individual issuers is limited to the following:
      1. making recommendations for existing client Qualified Replacement Property or similar portfolios with respect to the prioritization of which securities to use in making charitable gifts and making recommendations at the client's request for passively managed separate accounts stocks that be excluded from further purchases.
  - d. *Mutual funds, exchange traded funds (ETFs), and Closed End Funds* – Where we hold mutual funds, exchange traded funds, and/or closed end funds, such funds can have a variety of investment objectives as described below:

- i. To hold stocks issued by companies located throughout the world in developing and emerging markets in a variety of market segments.
    - ii. To hold bonds issued by governments, agencies and businesses located throughout the world in developed and emerging markets and with a variety of credit ratings.
    - iii. To follow a particular investment strategy, especially a strategy to provide an expected return that has little correlation to the expected return of stocks and bonds – often referred to as “alternative asset classes”. For example, we will often hold mutual funds which pursue different arbitrage strategies, mutual funds which invest in a particular industry such as mining of precious metals or pipeline distribution companies, and mutual funds which utilize hedging strategies to minimize the risk of stock market declines.
  - e. Other investments – Periodically a client may hold an investment that they ask for the firm to incorporate into its performance calculations and to incorporate into considerations of overall investment strategy but not with the mandate of recommending ongoing holding or sale, for example - annuity contracts, life insurance, equity real estate (personal residence), or interests in private entities or units in publicly traded partnerships.
6. *Account Review* – We perform a formal account review when we first begin to manage a new client’s portfolio, on a monthly basis for existing clients, when requested by a client, or at other times when we feel market or other circumstances warrant a review, such market/other circumstances including but not limited to changes in client financial position or risk tolerance, heightened market volatility, changes in market liquidity, changes in market structure or regulation, changes in tax rates, political instability, etc. Our account review consists of the following components.
- a. We review our client’s investment objective.
  - b. We review the strategies we are employing to achieve our client’s investment objective.
  - c. We review the securities held in our client’s accounts.
  - d. We evaluate our client’s current holdings by asset class and compare with our modified asset class weightings and our client’s target asset allocation.
  - e. When appropriate, we recommend and/or assist in executing the transactions necessary to bring the current holdings into compliance with our modified asset class weightings and the target asset allocation.
  - f. When considering the necessity of rebalancing a client account, we consider trading costs and income tax effects.
  - g. When it is appropriate, we contact our client to update their investment policy statement.

### **Investment Strategies and Risk of Loss**

We believe the investment strategies listed below and described above are prudent means for clients to employ to achieve their investment objectives. However, all investment strategies involve risk – no one can know with certainty the future outcome of today’s investment decisions. We’ve listed below the risks involved in our investment strategies that we believe to be material.

Because of the risks involved in investing, as described below, a client’s investment accounts may lose value, and the loss of value may be material.

## 1. Modern Portfolio Theory and Target Asset Allocation

- a. *Strategy* – We use Modern Portfolio Theory to determine how much of a given asset class (domestic stocks, international stocks, bonds, cash, etc.) we will include in the target asset allocation we recommend for each client account. To generate the target weights for each asset class in a target asset allocation, Modern Portfolio Theory requires an assumption of the average future return of each asset class, the variability in future returns, and the correlation between the future returns of the asset classes.
- b. *Risks:*
  - i. *Assumptions of Future Returns and Correlation of Returns* – It is possible that the assumed future investment returns, the variability in those returns and correlation of returns for each asset class will differ materially from actual future returns and correlation of returns. As a result, the actual investment returns of our recommended portfolios may differ materially from the expected returns of the portfolios.
  - ii. *Correlation of Asset Classes*- During times of financial crisis, the correlation of asset class returns can behave differently (can be more correlated) than they are during normal market conditions and in the assumptions we use in our models. This can result in our recommended portfolios behaving differently in times of financial crisis than Modern Portfolio Theory would anticipate.
  - iii. *Relevant Time Frames*- The investment return from specific asset classes may vary significantly in any given year from their historical averages and our expected future returns. To receive the intended benefit of portfolios designed using Modern Portfolio Theory, a client may have to hold our recommended target asset allocation for many years.

## 2. Prospective Valuation Models

- a. *Strategy* – Please see “Modify Asset Class Weightings Given Current Market and/or Client Conditions” in the Investment Process and Methods of Analysis section of this Item 8 for a discussion on how we use prospective valuation models.
- b. *Risks:*
  - i. *Model risk* – The models we use may indicate prospective investment returns which differ from the actual future returns of the asset classes we model, and those differences may be material.
  - ii. *Extended Periods of Abnormal Valuation* – Even if our models are materially correct in indicating prospective long term returns of the modeled asset classes, it may take several years for the asset classes to perform the way our models anticipate.

## 3. Vehicle Selection

- a. *Strategy*- We believe that passive management generally delivers better after tax and after fee returns in those asset classes characterized by a high degree of efficiency. Active management can add value in general as those parameters are relaxed (e.g. as tax rates move towards zero, as investment management fees decline, and/or as markets are characterized by lesser degrees of efficiency).
- b. *Risks:*
  - i. It is possible that the actively managed funds underperform the passive benchmarks that represent their respective asset classes
  - ii. It is possible for passive vehicles to provide adverse tracking of their respective broad market index targets.

- iii. It is possible that non-market events at investment management firms, either those used directly or those serving as sub-advisors for a mutual fund, exchange-traded fund, or closed end fund, necessitate the cessation of the use of the vehicle, generating adverse tax and/or trading costs.
- 4. **Geographic Investing and Currency Risk**
  - a. *Strategy* – All of our discretionary investment management clients reside in the United States (US). We believe that investing a portion of our client portfolios in stocks and bonds denominated in currencies other than the US dollar may provide better long-term diversification than only investing in stocks and bonds denominated in US dollars.
  - b. *Risks*:
    - i. *Geographic Investing* – It is possible that over a given period of time investing solely in US markets will provide a return superior to that received by investing in a globally diversified portfolio.
    - ii. *Currency Risk* – When a client invests in securities denominated in currencies other than the US dollar, it is possible to lose money based solely on changes in currency exchange rates between the relevant foreign currencies and the US dollar.
- 5. **Periodic Account Rebalancing**
  - a. *Strategy* – We recommend rebalancing of portfolios back to target asset allocations in quarterly reviews with clients as needed within the context of expected additions or withdrawals on the portfolio going forward and the tax and trading costs associated with such activity. We believe that this improves a client’s returns by selling asset classes that have appreciated relative to the target asset allocation and buying asset classes that have declined relative to the target asset allocation.
  - b. *Risks*:
    - i. *Trading Costs* – Rebalancing a client’s account may incur a cost to trade which must be set against the prospective benefits from rebalancing.
    - ii. *Tax Costs* – The client may incur a tax cost for rebalancing in a taxable account.
    - iii. *Liquidity* – Some assets by their nature are not candidates for regular rebalancing and must be “rebalanced around”. Illiquid interests in private equity limited partnerships are a common example.
- 6. **Investing in Financial Assets**
  - a. *Stocks*
    - i. *Strategy* – Over long periods of time, stocks have historically provided investment returns substantially in excess of the rate of inflation. Investment returns from stocks have fluctuated significantly over short and sometime extended periods of time. We recommend investment in stocks to attempt to grow the purchasing power of our clients’ investment assets.
    - ii. *Risks* – Investing in stocks includes the following material risks:
      - 1. Market risk – the risk of a broad stock market decline
      - 2. Fiscal and monetary policy – the risk that governmental policy decisions (e.g., increasing income tax rates) will cause a decline in stock prices
      - 3. Currency risk – the risk that currency exchange rates change, and cause a loss to an investor
      - 4. Economic risk – the risk that changes in an economy cause a decline in stock prices
      - 5. Volatility risk – the risk that stock prices and investment returns can vary widely over short or even extended periods of time.

b. *Bonds*

- i. *Strategy* – Bonds have historically provided investment returns equal to or modestly exceeding the rate of inflation, but which are significantly less than the long term return from stocks. Investment returns from bonds have fluctuated less over short and extended periods of time than investment returns from stocks. We recommend investment in bonds to maintain the purchasing power of our clients’ investment assets and to provide current income.
- ii. *Risks* - Investing in bonds includes the following material risks:
  1. Interest rate risk – when interest rates rise in the market, bond prices will decline and the price of long-term bonds will decline more than the price of short term bonds.
  2. Credit risk – the risk that the issuer of a bond will not make the interest and or principal payments to the holder of the bond when they are due.
  3. Inflation risk – the risk that the investment returns from bonds will be less than the rate of inflation, so that a bond investor’s purchasing power will decline over time.
- c. *Mutual Funds, Exchange Traded Funds, Closed End Funds* – We recommend investment in mutual funds, exchange traded funds, and closed end funds which hold stocks, bonds, and alternative asset classes. Please see our discussion, above, of the risks of investing in these asset classes.

## **Item 9: Disciplinary Information**

Neither we nor any of our advisers or employees have ever been involved in a disciplinary event or criminal proceeding.

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

David West, President, and the sole owner of our firm, holds the Chartered Financial Analyst designation. As described in Item 4 – Advisory Business, we offer certain non-advisory services to our clients. Our advisory service clients have no obligation to use our non-advisory services.

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

### **Code of Ethics**

We have adopted the Code of Ethics of the CFA Institute and we require all of our employees to abide by the terms of our Code of Ethics. This Code of Ethics is available to clients and prospective clients upon request. The key components of our Code of Ethics are as follows:

1. To fulfill our fiduciary responsibilities to our clients – to place our client’s interest before our own.
2. To act with integrity and dignity when dealing with clients, prospects, team members, and others.
3. To strive to maintain independence and objectivity.

## **Policies to Address Potential Conflicts of Interest**

We adopt policies to mitigate potential conflicts of interest. We've listed, below, certain of these policies that we consider material:

1. We will not buy or sell securities directly to or from our clients.
2. We will not match client securities transactions so that one client sells securities that another client buys.
3. We and our employees own and trade the same securities that we recommend for our clients.  
To ensure our trading does not disadvantage our clients, we require that we rebalance our client accounts prior to rebalancing our or our employees' accounts.
4. We and our employees may engage in investment strategies for our own accounts (including strategies with significant risks) which are different from the strategies we employ for our client accounts. In addition, we may employ certain investment strategies for some clients and not for others. To avoid conflicts of interest, we choose investment strategies for each client based on our client's individual investment objectives and risk tolerance. Each of our clients is free to place restrictions on how we will manage their investments.

## **Item 12: Brokerage Practices**

### **Directed Brokerage and Our Recommended Broker-Dealer**

Our clients direct us to execute transactions through a specified broker-dealer. When our clients specify which broker we are to use, clients may not receive the best execution of their transactions or the lowest cost commissions - this may cost our clients more money than if they received the best execution of their transactions or the lowest cost commission. Not all advisers require clients to specify a broker-dealer. We may recommend a broker-dealer to our clients. Our recommendation is based on our evaluation of various account service and brokerage platforms offered by institutional custodians and brokers to assist us in providing our advisory services to our clients. These programs facilitate our ability to provide necessary services to our clients, including, among other services:

1. Providing us access to information systems necessary to open and administer client accounts.
2. Providing us access to dedicated traders and trading desks.
3. Providing our clients access to an extensive list of mutual funds from differing fund families.
4. Providing us with the ability to directly enter trades for client accounts.
5. Providing us access to dedicated account representatives for the benefit of clients.
6. Providing us the ability to electronically download our clients' account positions, trades and market prices from a custodian directly into our portfolio accounting software. In recommending a broker, we may consider, among other things, the broker or dealer's execution capabilities, commission rates, reputation, access to the markets for the securities being traded and the account service and brokerage platform offered to support our client accounts. We will not necessarily attempt to obtain the lowest possible commission rates for transactions.

**Soft Dollar Arrangements**

We do not have any “Soft Dollar” arrangements. A “Soft Dollar” arrangement is an agreement between an advisor and a broker-dealer where the broker-dealer will provide goods and services (i.e., research, Bloomberg terminals, rent, etc.) to an advisory firm in exchange for directing client commissions to the broker/dealer.

**Item 13: Review of Accounts**

As a component of our investment management service, we provide a review of our clients’ investment accounts. Please see Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss, for a discussion of the frequency and content of our account review. Our account review consists of the following components:

1. We review our client’s investment objective.
2. We review the strategies we are employing to achieve our client’s investment objective.
3. We review the securities held in our client’s accounts.
4. We evaluate our client’s current holdings by asset class and compare with our modified asset class weightings and our client’s target asset allocation.
5. When appropriate, we recommend and/or assist in executing the transactions necessary to bring the current holdings into compliance with our modified asset class weightings and the target asset allocation.
6. When considering the necessity of rebalancing a client account, we consider trading costs and income tax effects.
7. When it is appropriate, we contact our client to update their investment policy statement.

Mr. David J. West, CFA, MBA performs the review of client accounts. We send a written report to our clients on a quarterly basis, showing the investments held in their accounts, the investment performance of the accounts, and the current account holdings by asset class relative to our client’s target asset allocation. We deliver our report in a paper format, though clients may request reporting in a digital format in addition to or in replacement of paper reports.

**Item 14: Client Referrals and Other Compensation**

We do not pay compensation to any third party for referring clients to us. We do not receive compensation from any third party service provider for referring a client to a third service provider. Please see Item 5 – Fees and Compensation, for more information on our fees and compensation.

**Item 15: Custody**

We do not accept or maintain custody of client funds. The qualified custodian selected by our client will send monthly or quarterly statements directly to our client. We urge clients to carefully review each statement they receive from their custodian, and to compare the balances between the



custodian's statements and the quarterly reports we send to our client. Please see Item 13 – Review of Accounts, for more details on the reports we send to clients.

### **Item 16: Investment Discretion**

We may accept discretionary authority over client's investment assets. Please see Item 4 – Advisory Business for a discussion of our discretionary investment management service. In our written agreement with our client, our client may give us the authority to execute trades in their accounts using our discretionary authority. Our clients may also limit or deny our discretionary authority in their investment management agreement.

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

We do not accept the authority or responsibility to vote client securities. Clients will receive proxy statements or other solicitations directly from their custodian. We do not accept client questions about proxy statements or other materials they receive from their custodian.

### **Item 18: Financial Information**

We do not have any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to our clients.

## **ADV Part 2B**

### **Brochure Supplement for:**

**David J. West, CFA ®, MBA**

This brochure supplement provides information about David J. West, CFA®, MBA that supplements the West Advisors, Incorporated brochure. You should have already received a copy of that brochure. Please contact Mr. West if you did not receive West Advisors, Incorporated brochure or if you have any questions about the contents of this supplement. Additional information about David J. West is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Mr. West's contact information and the contact information of West Advisors, Incorporated is as follows:

David J. West, CFA®, MBA  
email: [westadvisors@comcast.net](mailto:westadvisors@comcast.net)  
11095 Napa Valley Lane, Fishers, IN 46037  
Phone: (317) 627-1083  
Fax: (317) 578-2885

#### **Educational Background and Business Experience**

Bachelor of Science degree, with honors in Finance, from Indiana University in May of 1989. *Master of Business Administration* degree from Indiana University in May of 1997. Mr. West has been working full time as President of West Advisors, Incorporated from August 2005 to the present. *Chartered Financial Analyst* (CFA®) - Please see the Professional Designation Description section below for more information.

#### **Disciplinary Information**

David West has never been involved in a disciplinary event or criminal proceeding.

#### **Other Business Activities**

As described in Item 4: Advisory Business, above, we provide certain non-advisory services to our clients. In 2022, Mr. West spent approximately 10% of his time providing non-advisory services to our clients.

#### **Additional Compensation**

Mr. David West does not receive any additional compensation or economic benefit from anyone who is not a client of our firm.

**Supervision**

David West is involved in all material aspects of our investment process for all clients, including:

1. Formulation of written investment policy statements for clients
2. Formulation of investment strategy
3. Selection of investment vehicles
4. Review of investment accounts
5. Communication with clients

During the first quarter of 2023, we hired independent regulatory compliance consultant, Susan E. Mitchell, (“Sue”). Although David West doesn’t “report” to Sue, she was hired to oversee regulatory compliance items in addition to personal quarterly transactions.

**State Required Disclosures**

David West has never been found liable in an arbitration proceeding. Mr. West has never been found liable in a civil, self-regulatory organization or administrative proceeding. Mr. West has never filed a bankruptcy petition.

**Professional Designation Descriptions**

The Chartered Financial Analyst (CFA) designation is an international professional certification offered by the CFA Institute to financial analysts who complete a series of three examinations, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA charter-holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct. Candidates sit for each of the three examinations, sequentially, after passing the previous examination.

The examinations cover the following subject areas:

1. Ethical and Professional Standards
2. Quantitative Methods (such as the time value of money, and statistical inference)
3. Economics
4. Financial Reporting and Analysis
5. Corporate Finance
6. Analysis of Investments (stocks, bonds, derivatives, venture capital, real estate, etc.)
7. Portfolio Management and Analysis (asset allocation, portfolio risk, performance measurement, etc.)

For more information, see the CFA Institute website at [www.cfainstitute.org](http://www.cfainstitute.org).