

## Item 1 – Cover Page

Form ADV Part 2A - Appendix 1

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D/B/A  
Wealth Enhancement and Preservation

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CRD #172788

March 30, 2023

This wrap fee brochure provides information about the qualifications and business practices of Wealth Enhancement & Preservation of Georgia, LLC d/b/a Wealth Enhancement and Preservation (“the Firm” or “WEP”). If you have any questions about the contents of this brochure, please contact us at 678-739- 0175. 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.

Additional information about Wealth Enhancement & Preservation of Georgia, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Registration does not imply a certain level of skill or training.

## Item 2 - Material Changes

This Brochure Appendix dated March 30, 2023, is the annual update amendment to the Brochure Appendix for Wealth Enhancement & Preservation of Georgia, LLC d/b/a Wealth Enhancement and Preservation.

Since the filing of the firm's last annual update on March 29, 2022, we have made various updates to our Brochure Appendix, but no material changes were made.

Pursuant to regulatory requirements, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at 678-739-0175.

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

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## **Item 4 - Services, Fees and Compensation**

WEP offers a wrap fee program that is custodied at a non affiliated custodian. The Program provides investment advice, brokerage, and custodial services under a “wrap fee” arrangement. Generally, in a wrap fee arrangement, the Account pays a combined fee for investment advice, brokerage services, clearance and settlement services, and custodial services. Please see the attached Part 2A Brochure for additional information about the firm’s non-wrap fee programs.

### Investment Advisory Services

The Firm provides advisory services, giving continuous advice based on the client’s individual needs through personal discussions in which goals and objectives, based upon the client’s personal objectives are established. The Firm will develop a personal investment policy based upon an investment objective questionnaire and/or personal interview and manage the portfolio according to the criteria.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client’s instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, the Firm will notify the client that, unless the instructions are modified, it may cancel the instructions in the client’s account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund.

Because the Firm is a registered investment adviser, we are required to meet certain fiduciary standards when providing investment advice to clients. Additionally, when we provide investment advice related to a retirement plan account or an individual retirement account, we are considered fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. As such, we are required to act in your best interest and not put our interest ahead of yours, even though our compensation creates some conflicts with your interests in that the more you have us manage, the more we can earn. Our clients however are under no obligation to use services recommended by our associated persons. Furthermore, we believe that our recommendations are in the best interests of our clients and are consistent with our clients’ needs.

The Firm may provide advice in the form of a Financial Plan. Clients may receive a written plan in conjunction with the advisory services, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

Information on clients will be gathered by in-depth personal interviews and a review of personal financial information including data concerning current financial status, future requirements, risk appetite and goals. Based upon this thorough review, a written plan may be prepared for the client providing the client with a detailed plan designed to achieve their stated financial goals and objectives. If such a plan is provided it is recommended that the client review this plan with tax accountants, attorneys and other professional service providers.

### *Use of Model Portfolios*

The Firm offers the following model portfolios. Clients will be placed in one or more models based on the information gathered during our interviews and review of personal financial information.

- **Relative Strength** - A dynamic asset class investment strategy that uses Point & Figure<sup>1</sup> data to evaluate the strength of six asset classes: Domestic Equity, International Equity, Fixed Income, Foreign Currencies, Commodities, and Cash. ETFs representing the best performing two asset classes compared to each other and cash are selected for investment.
- **Moving Averages** - A Trend following model that determines whether or not to invest in 5 assets classes and 20 underlying investments based on the current 200-day moving average.
- **Economic** - Uses 16 indicators grouped in four categories to determine whether or not to be long the S&P500 or in cash. The four categories:
  - **Monetary indicators** include levels, changes, and differences in various interest rates, monetary policy, and money supply.
  - **Technical indicators** reflect levels, changes, and other measures of stock market activity.
  - **Sentiment indicators** gauge emotion in the market.
  - **Fundamental indicators** describe economic and valuation activities. These include measures of inflation, growth, and other factors related to the overall economy
- **Momentum** - An active strategy that can go long, short, or to cash in four asset classes (US Equities, Euro, Gold, and Oil) using Japanese Renko<sup>2</sup> charts to determine current momentum.
- **Equity Income** –
  - The company must be number 1 in its industry and/or have top brand names.
  - The company must have consistent profit margins and enormous pricing power.
    - The company must have a "fortress" balance sheet. This means they have enough cash or near cash assets to pay off debt multiple times over.
  - The company has less than average price volatility; profit margins and cash flow are better than S&P500 average.
  - The company must have consistently shown increased dividends, though past yields are no guarantee of future yields.
- **Managed Growth** - Uses a sector rotation model to identify major themes in the market, have exposure to those sectors controlled by demand and eliminate exposure to those sectors controlled by supply. The portfolio attempts to capture the stronger trends and avoid the weaker trends.
- **Diversified Strategic Income** - The premise behind our Income portfolio is to choose asset classes that historically pay high dividends, though past yields are no guarantee of future yields, and diversify investments within those classes using ETFs, Closed End Funds, and securities trading intra-day. Designed to provide maximum liquidity along with high income. The main objectives for the portfolio are to generate a 5-7% current yield and preserve the overall portfolio value.

#### Use of Alternative Investments

As detailed in Item 9 below, some associated persons of WEP are also registered as registered representatives ("RR") of Triad Advisors, LLC ("Triad"), a broker/dealer and FINRA member firm. These individuals are subject to Triad's compliance policies and procedures and supervisory oversight.

Triad's general policy prohibits an RR from recommending for purchase any "alternative investments" through custodians not affiliated with Triad. For purposes of this disclosure, "alternative investments" include, but are not limited to, limited partnerships, limited liability companies, private investment funds or other pooled investment vehicles, real estate partnerships and REITs. Notwithstanding the foregoing, Triad has approved a limited number of alternative investment sponsors and/or products, which will be available for RR's to recommend for purchase via custodians not affiliated with Triad. Triad will be compensated directly by the product sponsor for its review of the product/sponsor and for Triad's associated compliance and supervisory

oversight of all transactions conducted in connection with these approved sponsors and products. For more information on these fees please go to [www.compassadvisors.com/customer-information](http://www.compassadvisors.com/customer-information). Neither WEP nor any RR will receive a share of Triad's compliance and supervisory fee.

Clients are advised that there may be other alternative investment sponsors and/or products not recommended by WEP that are suitable for the client and that may cost more or less than those recommended by WEP. While Triad reviews numerous alternative investment sponsors and/or products on an on-going basis, Triad approves only a select number of sponsors/products pursuant to its due diligence requirements and reviews. Accordingly, your ability to obtain alternative investments through WEP will be limited to those Triad approved products. While you are free to explore various alternative investments independent of WEP, such investments cannot be obtained by means of WEP's guidance or recommendation.

### ***Fees and Compensation***

The specific manner in which fees are charged by the Firm is established in a client's written agreement. Fees are based on a percentage of assets under management and calculated at an annual rate and billed in advance on a quarterly basis. Fees are based on the assets in the account and in some instances, may be negotiated. The maximum fees allowed under the Program are presented below. All fees are negotiable at our sole discretion. Fees may be charged on a tiered basis, meaning a higher fee for assets below a certain threshold and a lower fee charged on the assets above the threshold; or a single fee may be charged for all assets based on the total in the account. Slightly higher fees may be charged for certain strategies. The maximum account fee is 2.5%.

| Account Size:                   | Fee percentage: |
|---------------------------------|-----------------|
| \$0 - \$999,999.99              | 1.5%            |
| \$1,000,000.00 - \$2,499,999.99 | 1.25%           |
| \$2,500,000 - \$Unlimited       | 1.00%           |

The initial fee is due upon the client's opening and funding an account. The initial fee will be based on the opening balance and will be prorated according to the number of days remaining in the calendar quarter. Thereafter, the fee for each calendar quarter will be calculated by multiplying the fair market value of the assets in the account as of the last trading day of the preceding calendar quarter by the annual fee and then dividing that result by four. Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar quarter and unearned fees will be rebated to the client. Rebated fees will be credited to the account automatically. Clients may elect to transfer the balance or request a check for the balance in the account. The cost for creating Financial Plans is included in the fees listed above.

As noted in the clients' Advisory Agreement all fees are debited directly from client accounts and are calculated using the total assets in the account as shown on the client custodial statement.

You may incur additional charges including, but not limited to, mutual fund sales loads, 12b-1 fees, surrender charges, and IRA and qualified retirement plan fees. Also, there is a \$100 per year custodial account fee minimum. We will never receive any portion of such commissions or fees. We are only compensated by the fee described above. We receive no other compensation in connection with your account managed by a third-party money manager. When we negotiate lower fees and expenses charged by third parties, all negotiated improvements are for your benefit. Please see the manager's Brochure for additional important information regarding fees charged.

**General Information**

The advisory fees and transaction charges do not cover charges imposed by third-parties for investments held in the account, such as contingent deferred sales charges or 12(b)-1 trails on mutual funds. In addition, each mutual fund or third party money manager charges asset management fees, which are in addition to the advisory fees charged by our firm. Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory agreement. The Management Fee also does not cover fees and charges in connection with: debit balances; margin interest; odd-lot differentials; IRA fees; transfer taxes; exchange fees; wire transfers; extensions; non-sufficient funds; mailgrams; legal transfers; bank wires; postage; costs associated with exchanging foreign currencies; and SEC fees or other fees or taxes required by law.

Although WEP believes its fees are reasonable in light of the services provided, clients should be aware that such fees may be more or less than the fees and commissions associated with investment advisory and brokerage services purchased separately. The comparison is dependent upon a number of factors, including the frequency of brokerage activity in the client's account, the size of the account under management, and any negotiated fee arrangements with respect to the account. Also, clients should be aware that since WEP absorbs certain transaction costs in wrap program accounts, we may have a financial incentive not to place trade orders in those accounts, so clients should be aware that this potential conflict of interest may exist. An investor should consider these factors prior to opening an Advisory Account with WEP. The wrap fees charged may be higher than those otherwise available if the services were provided separately for a discrete fee or if an Investment Advisor were to select brokerage and negotiate commissions in the absence of the extra consulting service provided. Clients should consider the value of the additional consulting services when making such comparisons. The combination of custodial, consulting, and brokerage services may not be available separately or may require multiple accounts, documentation, and fees. All fees described herein may be subject to negotiation depending on a range of factors including, but not limited to, account size and overall range of services requested.

Please see the attached Part 2A Brochure for additional information about the firm's non-wrap fee programs.

**Account Termination**

The client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will be accepted the day that it is received by the contra party. A termination fee may apply if the account is terminated within the first year of the advisory contract; however, a full refund will be provided without penalty if the client terminates the contract within 5 business days of signing the advisory agreement.

If you instruct WEP to terminate your advisory contract and liquidate your account, we will proceed with liquidation of your account in an orderly and efficient manner. There will not be a charge by us for such redemption; however, the client should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances. Clients must keep in mind that the decision to liquidate security issues or mutual funds may result in tax consequences that should be discussed with the client's tax advisor. Factors that may affect the orderly and efficient manner would be size and types of issues, liquidity of the markets, and market makers' abilities. Should the necessary securities' markets be unavailable and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination

orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. WEP and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

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

The Firm provides portfolio management services to individuals, corporations and business entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates, and trusts. The minimum account size is \$500,000 which is aggregated by household. The Firm has the discretion to waive the account minimum.

Certain managers may require a higher minimum as disclosed in the individual manager's Firm Brochure. Under certain circumstances, the minimum may be waived, including related accounts that may be combined to meet the minimum if the services involved may otherwise be provided.

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

Your WEP Investment Adviser Representative may serve as the portfolio manager in the wrap fee program. WEP may also outsource its portfolio management by using outside portfolio managers for the referenced Program. WEP uses industry standards to measure the performance of its portfolio managers; however, it does not use a third party auditor to review and verify the performance of its portfolio managers.

Since WEP may function as a wrap program portfolio manager, a conflict of interest may exist because WEP pays certain client trading costs from its fee. This may give us an incentive to make recommendations that cost us less, or to recommend fewer trades, regardless of the benefit to our client. However, we feel that the cost of trading is not material enough to influence our investment recommendations, and we feel that the harm to our clients and our reputation far outweighs any potential cost savings. It is our policy to always act in the best interests of our clients.

### ***Advisory Business***

The Firm provides advisory services, giving continuous advice based on the client's individual needs through personal discussions in which goals and objectives, based upon the client's personal objectives are established. The Firm will develop a personal investment policy based upon an investment objective questionnaire and/or personal interview and manage the portfolio according to the criteria.

Each client has the ability to impose reasonable restrictions on the management of his/her account, including the designation of particular securities or types of securities that should not be purchased for the account, or that should be sold if held in the account. If a client's instructions are unreasonable or an Investment Advisor Representative believes that the instructions are inappropriate for the client, the Firm will notify the client that, unless the instructions are modified, it may cancel the instructions in the client's account. A client will not be able to provide instructions that prohibit or restrict the Investment Adviser of an open-end or closed-end mutual fund or ETF with respect to the purchase or sale of specific securities or types of securities within the fund.



The Firm may provide advice in the form of a Financial Plan. Clients may receive a written plan in conjunction with the advisory services, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives.

Information on clients will be gathered by in-depth personal interviews and a review of personal financial information including data concerning current financial status, future requirements, risk appetite and goals. Based upon this thorough review, a written plan may be prepared for the client providing the client with a detailed plan designed to achieve their stated financial goals and objectives. If such a plan is provided it is recommended that the client review this plan with tax accountants, attorneys and other professional service providers.

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

The Firm does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

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

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term purchases of stock portfolios, mutual funds and fixed income securities.

Investment recommendations are based on an analysis of the client's individual needs, and are drawn from research and analysis. Security analysis methods may include the following:

- Fundamental analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors to determine if the company is underpriced or overpriced. 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.
- Technical analysis and charting: We attempt to determine the trend of a security by studying past market data, including price and volume. This presents a potential risk, as the price of a security can change directions at anytime and past performance is not a guarantee of future performance.
- Cyclical analysis: We attempt to identify the industry cycle of a company to determine whether the company is in a market introduction phase, growth phase or maturity phase. Generally projected revenues, growth potential and business risk may fluctuate based on the company's cycle stage.

Information for this analysis may be drawn from financial newspapers and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves a risk that clients should be prepared to bear. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- **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 particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **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.

### ***Voting Client Securities***

As a matter of firm policy and practice, Firm does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Clients should contact their financial advisor if they have any questions and/or to obtain this information. Clients will receive their proxies directly from their custodian or transfer agent.

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

WEP may act as both your registered investment adviser and your portfolio manager. WEP may outsource its portfolio management by using outside portfolio managers for the referenced Program. Therefore, your portfolio manager has the same access to your information as WEP. Your information includes, among other things, income, net worth, risk tolerance, and investment objectives. Your portfolio manager uses this information to determine the appropriate asset allocation and manage your investments. When you update your information with WEP, your portfolio manager will have immediate access to the same updated information.

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

You may communicate with portfolio managers directly. Consultations beyond normal business practices may require additional negotiated fees

## Item 9 - Additional Information

### ***Disciplinary Information***

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

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

Individuals associated with the Firm as an Investment Adviser Representative ("IAR") may also be registered with Triad Advisors, LLC, member FINRA/SIPC, as a Registered Representative ("RR"). Brokerage services may be offered separately from investment advisory services. Any such transactions may be facilitated through Triad Advisors in their capacities as registered representatives. Clients will be charged separately from their advisory services.

IARs may also be licensed to sell insurance products through various insurance companies that are unaffiliated with the Firm.

While these individuals endeavor at all times to put the interest of the clients first as part of the Firm's fiduciary duty, clients should be aware that the receipt of additional compensation creates a potential conflict of interest, and may affect the judgment of these individuals when making recommendations. However, our clients are under no obligation to purchase products recommended by our associated persons or to purchase products through our associated persons. We believe that our recommendations are in the best interests of our clients and are consistent with our clients' needs.

Although the Firm may recommend that clients establish accounts at a particular custodian, it is the client's decision to custody assets with any custodian. Firm is independently owned and operated and not affiliated with any custodian.

Information about your IAR's financial industry activities and affiliations is disclosed in the IAR's Brochure Supplement which you will receive with this brochure. Additional information about your IAR is also available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

The Firm has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at the Firm must acknowledge the terms of the Code of Ethics annually, or as amended.

Advisors of the Firm may buy or sell securities that are recommended to clients. The Firm's employees and persons associated with the Firm are required to follow the Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of the Firm and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for the Firm's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of the Firm 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 have been designated as exempt transactions, based

upon a determination that these would not materially interfere with the best interest of the Firm's clients. In addition, the Code requires pre-approval of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between the Firm and its clients.

Advisors may recommend and trade in the same securities with clients and/or related accounts at or about the same time. Generally, this would pose a conflict if the Advisor or related account were given a better price than the client. To mitigate this conflict, it is procedure to not trade an Advisors account or related persons account on the same day as a client unless the client gets the better price.

#### Aggregated trades (employees and client trades)

Trades may be done on an aggregated basis when consistent with the Firm's obligation of best execution. In such circumstances, the Advisor (or related account) and client accounts will share commission costs equally and receive securities at a total average price. The Firm will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

The Firm's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the Compliance Department at our main number.

#### ***Review of Accounts***

Account reviews are conducted by the Advisor. Account performance is reviewed not less than quarterly. Factors that are considered during such reviews include, but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, monthly distributions, concentrated positions, diversification, and outside holdings. Examples of situations that may impact Client's account would be the following: performance that is not in line with the client's "downside risk tolerance," change in investment objective, the client makes a significant addition of capital or withdrawal of capital from the account, rebalancing of the portfolio if current allocation and targeted allocation are not consistent, concentrated position that could lead to volatility, etc.

The client agrees to inform the firm in writing of any material changes to the information included in the questionnaire or any other change in the client's financial circumstances that might affect the manner in which client's assets should be invested. Clients may contact the firm during normal business hours to consult with the firm concerning the management of the client's account(s).

#### Performance Reports

All managed accounts receive account statements monthly if there is activity in the account and quarterly at a minimum. We offer a quarterly review and performance report to all clients upon request

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

The Firm does not receive an economic benefit by anyone other than the client for providing investment advice and other advisory services. The Firm does not compensate others for client referrals.

***Financial Information***

Registered Investment Advisers are required to provide you with certain financial information or disclosures about Firm's financial condition. Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.

## Privacy Policy

We collect nonpublic personal information about you from the following sources: Information we receive on applications or other forms and information about your transactions with our affiliates, others, or us. Information collected includes social security numbers, income, account balances, and types and amounts of investments and transactions. We do not disclose any non-public information about our current or former customers to anyone, except as permitted by law or in order to provide the current services. Our employees have limited access to your personal information based on their responsibilities to provide products or services to you. Be assured that we maintain physical, electronic and procedural safeguards in compliance with federal standards to protect your information.

We collect and share your information for our everyday business purposes. Information is shared with one or more of our affiliated entities, at our sole discretion and for purposes either related or unrelated to services we provide you, and to nonaffiliated entities that either perform services for us or function on our behalf (such as check printing services, account aggregation providers, broker/dealers, investment companies, and insurance companies). Affiliates are companies related by common ownership or control. They can be financial and nonfinancial companies. Nonaffiliates are companies not related by common ownership or control. They can be financial and nonfinancial companies. We share personal client information with Triad Advisors, LLC, a nonaffiliated registered broker/dealer."

WEP will disclose customer information to and receive customer information from Triad for the purposes of offering additional products and services to you as well as to effect, administer, service and enforce your requested transactions and maintain and service your accounts. Triad may also continue to use personal information they receive from us to perform services on our behalf, to respond to communications from you, as you authorize or request, or, if you are their customer, to offer you their products or services. To the extent that you are entitled to other protections under applicable laws and these laws apply, we will comply with them when we share personal information about you.

If the IAR servicing your account leaves us to join another firm, he/she is permitted to retain copies of your information so that he or she can assist with the transfer of your account and continue to serve you at their new firm.

"Opting-out" of Third Party Disclosures: If you do not want your Investment Advisor to retain copies of your client sensitive information when he or she leaves us to join another firm, you may contact our Compliance Department by calling 678-739-0175.