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This brochure provides information about the qualifications and business practices of Welch Financial Planning & Insurance, LLC. If you have any questions about the contents of this brochure, please contact us at 303-939-8766. 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. Registration (e.g. "registered investment advisor") does not imply a certain level of skill or training.

Additional information about Welch Financial Planning & Insurance, LLC also is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).



## **ITEM 2: MATERIAL CHANGES**

Pursuant to United States Securities and Exchange Commission (“SEC”) rules, Welch Financial Planning & Insurance, LLC will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm’s fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, Welch Financial Planning & Insurance, LLC will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notices will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for Welch Financial Planning & Insurance, LLC at any time by contacting their investment advisor representative.

This is a new brochure as of December 22, 2023



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## **ITEM 4: ADVISORY BUSINESS**

### ***Firm Description***

Welch Financial Planning & Insurance, LLC (“WFP,” or “Firm”) is an investment advisor registered with the SEC since February 2024.

The Principal Owner and Chief Compliance Officer of WFP is Tron D. Welch.

### ***Types of Advisory Services***

The Firm offers a large variety of services, including portfolio management, investment analysis, financial planning, and retirement plan consulting for individuals and high net worth individuals. The Firm offers these services to clients or prospective clients (“Clients”).

Prior to providing any investment advisory services, WFP requires a written financial services agreement (“FSA”) be executed by the Client. The FSA will outline the services available to the Client and the fees the Client may incur.

### ***Investment Philosophy***

Advisors at WFP believe in providing a customized, client-centered approach to help individuals, families, and small businesses achieve financial success.

### ***Investment Advisory Services***

The Firm works to provide tailored advisory services to meet the needs of each Client and continually seeks to manage the portfolios in a manner consistent with their specific financial situation. Prior to providing services, a WFP financial professional will review and discuss each Client’s situation and needs. From here, WFP will allocate and manage Client assets that are in alignment with their investment objectives, risk tolerance, and risk capacity.

The Firm does not act as a custodian of Client assets. The Client always maintains asset control. The Firm places trades for Clients under a limited power of attorney through a qualified custodian/broker.

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

The Firm offers financial planning and consulting services.

Financial Planning and Consulting services typically include investment and non-investment matters, business succession planning, estate planning, and family meetings.



To engage in financial planning and consulting services, Clients enter into an agreement that sets the terms of the engagement and scope of services. When requested by the Client, the Firm may recommend third parties to assist in implementation. The Client retains discretion over implementation decisions and is free to accept or reject any recommendation of the Firm. It is the Client's responsibility to notify the Firm of changes to financial situations and objectives.

### ***Held Away Accounts***

With a Client's consent, the Firm may also provide discretionary and non-discretionary individual wealth management services to Client's "Held Away Accounts." Held Away Accounts are assets held at a custodian that are not directly accessible to the Firm. The custody and management of Held Away Accounts are discussed in greater detail in Item 15, "Custody." A Client who requests individual wealth management services for Held Away Accounts must agree to the Pontera Order Management System End User Terms and Conditions and Privacy Policy and must further agree to keep the Firm apprised of any changes to the username and password access credentials for the Held Away Accounts.

The Firm does not use Client's usernames or passwords to manage Held Away Accounts. Rather, such access credentials are provided to Pontera, which grants WFP access to Held Away Accounts for viewing and trading authority only. The Firm is only able to view the holdings and balances of Held Away Accounts and enter trades in the Held Away Accounts under WFP's discretionary or non-discretionary authority through the Pontera system. As described below, services will be invoiced against the Client's other accounts that are held by WFP's qualified custodian.

### ***Retirement Consulting***

The Firm assists retirement plan sponsors by serving as their investment and fiduciary advisor, helping them meet the needs of their employees while working within the guidelines put in place by ERISA. The Firm's service model involves implementing customized processes designed to help sponsors manage their organization's plan as effectively as possible, including quarterly reporting, ERISA compliance and, when requested, assisting with employee allocations.

As part of a comprehensive corporate retirement plan management strategy, WFP regularly monitors plan fees and costs and review the overall performance of investment options. Significant cost savings from providers and vendors may be realized through aggressive negotiation and process improvement. Among other functions, WFP will design and help implement an investment policy statement, propose funds to watch and make recommendations regarding investment changes within the plan, monitor existing investment options and conduct participant education seminars.

### ***Educational Seminars/Workshops***

The Firm provides an informative series of educational seminars and workshops periodically throughout the year. Supplemental materials are provided to enhance the learning experience.



### ***Tax Planning and Accounting Services***

The Firm offers simple tax preparation services.

### ***Services Tailored to the Client's Needs***

Services are provided based on a Client's specific needs within the scope of the services provided as discussed above. A review of the information provided by the Client regarding the Client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

### ***Wrap Fee Program versus Portfolio Management Program***

The Firm does not offer a Wrap Fee Program.

### ***Assets Under Management***

As of December 22, 2023, Advisor has the following assets under management:

Discretionary assets: \$0  
**NON-DISCRETIONARY ASSETS: \$0**

## **ITEM 5 FEES AND COMPENSATION**

### ***Individually Managed Accounts***

Fees for individually managed accounts are tier priced as follows:

<b><i>Account Size</i></b>	<b><i>Fee (annual percentage)</i></b>
Up to \$500,000	1.50%
\$500,001-\$1,000,000	1.25%
\$1,000,001-\$3,000,000	1.00%
Over \$3,000,000	0.75% (flat)

All asset-based fees are deducted by the qualified custodian of record on a quarterly basis in advance based on the average daily account value during the previous quarter, or as otherwise indicated in the FSA. Client statements for prior deductions will be provided on a quarterly basis. Mid-quarter asset flow will be charged prorated fees based on the number of days remaining in the quarter after all Client funds have been transferred.



All fees paid to the Firm for investment advisory services are separate and distinct from the expenses charged by third-party managers and investment companies to their shareholders. These fees and expenses are described to the Client in separate disclosures. These fees will generally include third-party management fees, an investment company management fee, other fund expenses, and in some situations a possible distribution fee. All fees are negotiable at the discretion of WFP; fees charged may be higher or lower than the above stated.

The Firm will provide investment advisory services and portfolio management services but will not provide custodial or other administrative services. At no time will WFP accept or maintain custody of a Client's funds or securities except for authorized fee deductions. The Client may contact the custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian. The Firm may act at the Client's convenience to facilitate such written communications to the custodian, provided that such action is not construed to be custody of Client assets.

The Client is responsible for all custodian and securities execution fees charged by the custodian and executing broker-dealer. Fees paid to WFP are separate and distinct from the custodian and execution fees.

Clients may request to terminate their FSA with the Firm, in whole or in part, by providing advance written notice pursuant to the FSA. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to the Client through the custodian. The Client's FSA with the Firm is non-transferable without the Client's written approval.

### ***Fee Deduction Disclosure***

When WFP deducts its management fee from client accounts utilizing a qualified custodian, the firm is required to meet the following requirements.

- a. Possess written authorization from the Client to deduct advisory fees from an account held by a qualified custodian;
- b. send the qualified custodian a written invoice detailing the fee amount to be deducted from the client account; and
- c. The Firm must ensure that on at least a quarterly basis, the custodian sends to the Client a statement showing all transactions within the account during the reporting period.

### ***Fees Paid in Advance***

Where WFP may request a fee in advance, the amount paid in advance will not be more than \$1,200 per Client and more than six (6) months in advance.



### ***Management of Held Away Assets***

When advising certain Clients with Held Away Assets, WFP will use Pontera's third-party platform. Pontera will directly charge the Firm 0.30% quarterly in advance for the use of its platform. In many cases, WFP will not pass this additional fee on to the Client; however, the Firm does reserve the right to do so if it sees fit.

### ***Fixed Fees***

The Firm offers educational seminars and workshops for a flat fee of \$50.

The Firm may also charge a flat fee for financial planning services. This flat fee will be negotiable depending on the nature and complexity of the financial planning.

### ***Hourly Fees***

The Firm may charge an hourly fee for financial planning services. The hourly rate will be negotiable depending on the nature and complexity of the financial planning.

### ***Right of Cancellation***

In addition to the right to terminate the FSA pursuant to its terms, a Client may cancel an agreement with Advisor within five (5) business days of first receiving a copy of this disclosure brochure and supplement without penalty or fee.

## **ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

The Firm does not charge or accept performance-based fees.

## **ITEM 7 TYPES OF CLIENTS**

The Firm provides investment advice to many different types of Clients. These Clients generally include individuals, trusts, estates, corporations, pension/retirement plans, and other types of business entities.

### ***Minimum Account Size***

The Firm has a minimum account size requirement of \$1,000,000. However, this account size requirement may be waived at the discretion of WFP in certain circumstances.





## **ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### ***Methods of Analysis***

The Firm may use the following methods when considering investment strategies and recommendations.

#### Charting Review

Charting is a technical analysis that charts the patterns of stocks, bonds, and commodities to help determine buy and sell recommendations for Clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in spotting the effect of key events on a security's price, its performance over a period of time, and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

#### Fundamental Review

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities.

#### Technical Review

A technical analysis is a method of evaluating securities that analyzes statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value, but instead uses past market data and statistical tools to identify patterns that can



suggest future activity. Historical performance of securities and the markets can indicate future performance.

### Cyclical Review

A cyclical analysis assumes the market reacts in reoccurring patterns that can be identified and leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these reoccurring patterns, or cycles, affect the returns of a given investment, asset, or company. Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical analyses exist because the broad economy has been shown to move in cycles, from periods of peak performance to periods of low performance. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

### Economic Review

An economic analysis determines the economic environment over a certain time horizon. This involves following and updating historic economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for the world's major economies.

## ***Investment Strategies***

When implementing investment advice to Clients, WFP may employ a variety of strategies to best pursue the objects of its Clients. Depending on market trends and conditions, WFP will employ any technique or strategy herein described, at the WFP's discretion and in the best interests of the Client. The Firm does not recommend any particular security or type of security. Instead, the WFP makes recommendations to meet a particular Client's financial objectives. There is inherent risk to any investment and Clients may suffer loss of all or part of a principal investment.

### Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a Client is invested or in the overall market. Long-term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term strategy can expose Clients to various other types of risk that will typically surface at various intervals during the time the Client owns the investments. These risks include, but are not limited to, inflation (purchasing power) risk, interest rate risk, economic risk, and political/regulatory risk.



### Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

### Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

### ***Risk of Loss***

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. The Firm does not provide any representation or guarantee that the financial goals of Clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, in general, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that the Client should be prepared to bear. The Firm does not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate Clients from losses due to market corrections or declines. The Firm cannot offer any guarantees or promises that the Client's financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. The Firm also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses.



During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law the Client would be taxed on short-term capital gains at ordinary income tax rates, if held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. The Firm may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions.

There is no guarantee any model will work under all market conditions. For this reason, WFP includes model related results as part of our investment decision process but the Firms often weighs professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by Advisor plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions,



and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

**Inflation, Currency, and Interest Rate Risks.** Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by the Firm may be affected by the risk that currency devaluations affect Client purchasing power.

**Liquidity Risk.** Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. The Client's investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert Client's investment to cash or other assets.

**Legislative and Tax Risk.** Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. The Firm does not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

**Foreign Investing and Emerging Markets Risk.** Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.



Information Security Risk. The Firm may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisors. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. The Firm has taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with WFP may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, Clients may experience adverse tax consequences from the early assignment of options purchased for a Client's account. Clients should consult their own tax advisors and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that WFP's judgment or investment decisions on behalf of any particular account will necessarily produce the intended results. The Firm's judgment may prove to be incorrect, and an account might not achieve its investment objectives. In addition, it is possible that WFP may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. The Firm and its representatives are not responsible to any account for losses unless caused by WFP breaching our fiduciary duty.

Dependence on Key Employees. An accounts success depends, in part, upon the ability of WFP's key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

The Firm does not primarily recommend a particular type of security.

## **ITEM 9 DISCIPLINARY INFORMATION**

Neither the firm nor its representatives have any history of discipline.



## **ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

### ***Registration as a Broker/Dealer or Broker/Dealer Representative***

The Firm is not registered and does not have an application pending to register, as a broker-dealer

### ***Registration as a Futures Commission Merchant, Commodity Pool Operator***

The Firm and its management persons are not registered and do not have an application pending to register as a futures commission merchant, commodity pool operator/advisor.

### ***Licensed Insurance Agents***

Some of WFP's financial professionals are licensed insurance agents and recommend the purchase of certain insurance-related products on a commission basis. The recommendation by a WFP financial professional that a Client purchase or sell an insurance commission products presents a conflict of interest, as the receipt of a commissions may provide an incentive to recommend investment products based on commission received, rather than on a particular Client's need. Clients are not under any obligation to purchase or sell any commission products from a WFP financial professional.

### ***Selection of Other Advisor***

The Firm does not recommend or select other investment advisors for its Clients.

## **ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

According to federal and state law, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. The Firm and its representatives have a fiduciary duty to all Clients. The fiduciary duty of WFP and its representatives toward its Clients is considered the core underlying principle for WFP's Code of Ethics and represents the expected basis for all dealings our representatives have with our Clients. The Firm has the responsibility to ensure that the interests of its Client are placed ahead of its own investment interests, as well as the investment interests of its representatives. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will comply with all federal and state securities laws at all times. Full disclosure of all material facts and potential conflicts of interest will be provided to Clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect their duty of complete loyalty to our Clients.





The Firm and its financial professional may purchase or sell securities that are also recommended to Clients. This practice may create a situation where WFP and its financial professionals are able to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as “scalping” (*i.e.*, the practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if WFP did not have adequate policies in place to detect such activities. In addition, these procedures are designed to help detect insider trading, “front-running” (*i.e.*, personal trades executed prior to those of WFP’s Clients) and other potentially abusive practices.

The Firm has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of WFP’s “Access Persons”; that is persons who have access to the Firm’s nonpublic information. This policy requires that Access Persons provide the Chief Compliance Officer with a written report of their current securities holdings as part of the process of becoming an Access Person. Additionally, each Access Person provides the Chief Compliance Officer with a written or electronic report of the Access Person’s current securities holdings at least once each 12-month period thereafter on a date WFP selects.

The Firm and its financial professionals may purchase or sell securities at or around the same time as those securities are recommended to Clients. This practice creates a situation where we are able to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. The Firm has a personal securities transaction policy in place to monitor the personal securities holdings of each WFP Access Person.

## **ITEM 12 BROKERAGE PRACTICES**

### ***Selection and Recommendation***

The Firm has a duty to select brokers, dealers, and other trading venues that provide best execution for its Clients. The duty of best execution requires an investment advisor to see to execute securities transaction for clients in such a manner that the client’s total cost or proceeds in each transaction is the most favorable under the circumstances, taking into account all relevant factors. The lowest possible commission, while very important, is not the only consideration.

It is the policy of the WFP to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in an instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standard and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, WFP considers the following factors, without limitation, in selecting brokers and intermediaries:





- Execution capability
- Order size and market depth
- Availability of competing markets and liquidity
- Reputation and integrity
- Trading characteristics of the security
- Responsiveness
- Availability of accurate information
- Recordkeeping comparing markets
- Quantity and quality of research
- Ability and willingness to commit received from the broker dealer capital
- Financial responsibility of the broker
- Available technology dealer
- Confidentiality
- Ability to address current market conditions

The Firm evaluates the execution, performance, and risk profile of the broker-dealers it uses at least quarterly.

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

Soft dollar practices are arrangements whereby an investment advisor directs transactions to a broker-dealer in exchange for certain products and services that are allowable under federal and state law. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a “safe harbor,” which provides that an investment advisor that has discretion over a client’s account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the advisor determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

The Firm does not currently have any soft dollar benefit arrangements that fall outside Section 28(e).

### ***Brokerage for Client Referrals.***

The Firm does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

### ***Directed Brokerage***

The Firm does not allow client-directed brokerage.

### ***Order Aggregation***

The Firm may, at times, aggregate sale, and purchase orders of securities (“block trading”) for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the Client. Clients also benefit relatively from better purchase or sale execution prices, or beneficial timing of transaction, or a combination of these and other factors. Aggregate orders will be allocated to Client



accounts in a systematic, non-preferential manner. The Firm may aggregate or “bunch” transaction for a Client’s account with those of other Clients in an effort to obtain the best execution under the circumstances.

### ***Trade Error Policy***

The Firm maintains a record of any trading errors that occur in connection with investment activities of its Clients. Both gains and losses that result from a trading error made by WFP will be borne or realized by WFP.

## **ITEM 13 REVIEW OF ACCOUNTS**

### ***Period Reviews***

The Firm regularly reviews and evaluates Client accounts for compliance with each Client’s investment objectives, policies, and restrictions. The Firm analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of WFP and shall occur at least once on a quarterly basis.

### ***Intermittent Review Factors***

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the Client’s financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify WFP promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restriction on their account.

### ***Reports***

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Clients may also run customized reports at any time through the WFP Client Portal. The available reports include positions, returns, and capital gains. Confirmations and statements are prepared and delivered by the custodian.

### ***Financial Plans***

All financial planning accounts are reviewed upon financial plan creation and plan delivery by WFP. There are multiple levels of review for each financial plan. Each financial planning Client will receive the financial plan upon completion.



## **ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

### ***Client Referrals***

The Firm may receive financial compensation, aside from soft dollars discussed above, in the form of a percentage of commissions received on property and casualty insurance sales. The Firm is compensated with a portion of insurance commissions on any Clients that are referred to independent insurance agents. This is a conflict of interest because WFP has a financial incentive to refer Clients to third-party independent insurance agents based on the percentage of commissions received rather than the Client's needs. This conflict is addressed by WFP by having policies and procedures in place to ensure that any referrals to third parties are suitable and appropriate. The Client is under no obligation to purchase insurance products from third parties.

### ***Other Compensation***

The Firm does not pay another person or entity for referring or soliciting Clients for WFP.

## **ITEM 15 CUSTODY**

### ***Custodian of Assets***

Custody means holding, directly or indirectly, client funds or security or having any authority to obtain possession of them.

The Firm does not have direct custody of any Client funds and/or securities. The Firm will not maintain physical possession of Client funds and securities. Instead, Client funds and securities are held by a qualified custodian.

While WFP does not have physical custody of Client funds or securities, payments of fees may be paid by the custodian from the custodian brokerage account that holds Client funds pursuant to the Client's account application.

In certain jurisdictions, the ability of WFP to withdraw its management fees from the Client's account may be deemed custody. Prior to permitting direct debit of fees, each Client provides written authorization permitting fees to be paid directly from the custodian.

As part of the billing process, the Client's custodian is advised of the amount of the fee to be deducted from that Client's account. On at least a quarterly basis, the custodian is required to send to the Client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of WFP's advisory calculation. Therefore, it is important for Clients to carefully review their custodial statements to verify the accuracy of



the calculation. Clients should contact WFP directly if they believe that there may be an error in their statement.

Certain Client accounts subject to WFP's services may be held at a custodian that is not directly accessible by the Firm ("Held Away Accounts"). The Firm may, but is not required to, manage these Held Away Accounts using the Pontera Order Management System. Pontera allows us to view and manage these assets on a discretionary or non-discretionary basis. To manage the Held Away Account, a client must agree to the Pontera End User Terms and Conditions and Privacy Policy and must further agree to keep us apprised of any changes to the client's usernames and passwords for the Held Away Accounts so that we can promptly update the client's credentials using the Pontera system. The Client also must agree to promptly address any requests to update applicable login credentials when requested by the Pontera system. In the event of any delay by a client to update applicable login credentials, the client must acknowledge in the advisory agreement that WFP will not have access to view or manage the Held Away Account, which may result in investment losses or inadvertently incorrect valuations be used in the billing process under the investment management agreement. The Firm will not be responsible for any losses arising from a client's delays in updating login credentials through the Pontera system and The Firm will be under no obligation to credit any fees for valuations made in good faith during period when WFP did not have access to any Held Away Account in calculating its fees under the investment management agreement.

## **ITEM 16 INVESTMENT DISCRETION**

The Firm may exercise full discretionary authority to supervise and direct the investments of a Client's account. This authority will be granted by Clients upon completion of the Firm's FSA. This authority allows WFP and its affiliates to implement investment decisions without prior consultation with the Client. Such investment decisions are made in the Client's best interests and in accordance with the Client's investment objectives. Other than agreed upon management fees due to WFP, this discretionary authority does not grant the Firm the authority to have custody of any assets in the Client's account or to direct the delivery of any securities or the payment of any funds in the account to WFP. The discretionary authority granted by the Client to WFP does not allow WFP to direct the disposition of such securities or funds to anyone except the account holder.

## **ITEM 17 VOTING CLIENT SECURITIES**

The Firm does not perform proxy voting services on the client's behalf. Clients are encouraged to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon the client's request, Firm representatives may provide limited clarifications of the issues presented in the proxy voting materials based on his or her understanding of issues presented in the proxy voting materials. However, clients have the ultimate responsibility for making all proxy voting decisions.



## **ITEM 18 FINANCIAL INFORMATION**

### ***Balance Sheet Requirement***

The Firm is not the qualified custodian for client funds or securities and does not require prepayment of fees more than \$1,200 per client for six (6) months or more in advance.

### ***Financial Condition***

The Firm does not have any financial impairment that would preclude the Firm from meeting contractual commitments to Clients.

### ***Bankruptcy Petition***

The Firm has not been the subject of a bankruptcy petition at any time during the last 10 years

