

# Weiss Financial Group LLC

## Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Weiss Financial Group LLC. If you have any questions about the contents of this brochure, please contact us at (845) 621-4700 or by email at: [kweiss@weissadvisory.com](mailto:kweiss@weissadvisory.com). 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 Weiss Financial Group LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Weiss Financial Group LLC's CRD number is: 159331*

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*Registration does not imply a certain level of skill or training.*

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## Item 2: Material Changes

Weiss Financial Group LLC has the following material changes to report. This list summarizes changes to policies, practices or conflicts of interests only.

- Weiss Financial Group LLC (WFG) has added a new third party money manager (Betterment LLC). (Item 4)
- WFG updated its financial planning services and fees. (Items 4 and 5)
- WFG updated information related to registrations of supervised persons. (Item 10)
- WFG updated information related to its brokerage practices. (Item 12)
- WFG updated information related to how it is compensated when recommending other advisers to clients. (Item 10)
- WFG has reduced the fees for the third party money manager (Betterment LLC). (Item 5)

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Weiss Financial Group LLC is a Limited Liability Company organized in the state of New York. This firm has been in business since October of 2011, and the principal owners are Keith D. Weiss and Scott G. Weiss.

### B. Types of Advisory Services

Weiss Financial Group LLC (hereinafter "WFG") offers the following services to advisory clients:

#### *Investment Supervisory Services*

WFG offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WFG creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

WFG evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. WFG will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

#### *Financial Planning*

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. These services are based on hourly and fixed fees. The final fee structure is documented in Exhibit II of the Financial Planning Agreement.

#### *Services Limited to Specific Types of Investments*

WFG generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, REITs, insurance products including

annuities, private placements, and government securities. WFG may use other securities as well to help diversify a portfolio when applicable. WFG may use options as a protective investment strategy when appropriate.

### ***Consulting Services***

WFG offers consulting services to clients based on the client's needs at a rate of \$150 to \$350 per hour.

### ***Selection of Other Advisers***

WFG may direct clients to third-party investment advisers. Before selecting other advisers for clients, WFG will always ensure those other advisers are properly licensed or registered as investment adviser. Currently, WFP may direct clients to Betterment, LLC.

## **C. Client Tailored Services and Client Imposed Restrictions**

WFG offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent WFG from properly servicing the client account, or if the restrictions would require WFG to deviate from its standard suite of services, WFG reserves the right to end the relationship.

## **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. WFG does not participate in any wrap fee programs.

## **E. Amounts Under Management**

WFG has the following assets under management as of 12/31/2015:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$46,645,673.00	\$0.00	December 2016

## Item 5: Fees and Compensation

### A. Fee Schedule

#### *Investment Supervisory Services Fees*

Total Assets Under Management	Annual Fee
\$1 - \$999,999	1.50%
\$1,000,000 - \$1,499,999	1.25%
\$1,500,000 - \$2,999,999	1.00%
\$3,000,000 and Above	0.85%

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in arrears, and clients may terminate their contracts with written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization. If a client uses WFG for financial planning they may receive a discount on the investment service fees.

#### *Financial Planning Fees*

##### *Hourly Fees*

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is between \$150 and \$400. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. WFG reserves the right to waive the fees for financial planning if the client places assets under management pursuant to the financial plan.

##### *Fixed Fees*

WFG also offers two separate financial planning services for a fixed fee:

##### Strategy Session

One-time fee of \$399. This session is designed to answer 1 or 2 financial concerns of the client. This fee is negotiable and the final fee will be attached as Exhibit II of the Financial Planning

Agreement. One half of this fee is payable in advance and the remaining one-half if payable upon completion of the action plan. Fees paid in advance will be refunded based on the prorated amount of work completed at the point of termination. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. This session will include a 60 minute strategy session, email summary of the discussion and an action plan.

### Collaborative Planning

One-time fee ranging from \$1,000 to \$5,000. This fee is negotiable and the final fee will be attached as Exhibit II of the Financial Planning Agreement. One half of this fee is payable in advance and the remaining one-half if payable upon completion of the action plan. Fees paid in advance will be refunded based on the prorated amount of work completed at the point of termination. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. This service will include 2-3 meetings for plan development, email summaries of the discussions, action plans, and a financial plan. It also includes access to our Secure Client Website for planning, budgeting, account aggregation and document storage, access to First-Step cash flow management software, and access to additional financial professionals.

ON-GOING SUPPORT EXCLUSIVE MEMBERSHIP: Available only to clients who have completed a financial plan with us through our collaborative planning service. This option includes goal implementation, on-going plan monitoring, review meetings (in person, over the phone, or through email), comprehensive financial planning services, access to our Secure Client Website for planning, budgeting, account aggregation and document storage, access to First-Step cash flow management software, access to additional financial professionals, and discounted investment management services (if choosing to use our services). Includes by check-ins every six months and anytime email support as questions arise. In addition, you will receive email summaries of discussions along with action plans, Starting @ \$99/month (Billed monthly in arrears. You will be billed on the 1st of the month and can cancel anytime. Monthly fees are paid using ACH)

WFG will offer discounted investment supervisory services to clients entering into an agreement for Collaborative Planning with On-going Support.

### ***Consulting Services***

WFG offers consulting services to clients based on the client's needs at a rate of \$150 to \$350 per hour. The fees are negotiable and are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Clients may terminate their contracts without penalty within five business days of signing the advisory contract. WFG reserves the right to waive the fees for financial planning if the client places assets under management pursuant to the financial plan.

### *Selection of Other Advisers Fees*

<b>Total Assets Under Management</b>	<b>WFG's Fee</b>	<b>Betterment's Fee</b>	<b>Total Fee</b>
\$1 - \$999,999	1.25%	0.20%	1.5%
\$1,000,000 - \$1,499,999	1.00%	0.20%	1.25%
\$1,500,000 - \$2,999,999	0.75%	0.20%	1.00%
\$3,000,000 and Above	0.60%	0.20%	0.85%

WFG's fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in arrears, and clients may terminate their contracts with written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization. If a client uses WFG for financial planning they may receive a discount on the investment service fees.

## **B. Payment of Fees**

### *Payment of Investment Supervisory Fees*

Unless requested otherwise advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly in arrears.

### *Payment of Financial Planning Fees*

Hourly Financial Planning fees are paid via check or credit card in arrears upon completion. Because fees are charged in arrears, no refund is necessary.

Fixed fees are paid by check, credit card, or ACH transfer in arrears and in advance, although never more than six months in advance. Fees paid in advance will be refunded based on the prorated amount of work completed at the point of termination

### *Payment of Selection of Other Advisers Fees*

Fees for selection of Betterment as third-party adviser are withdrawn by Betterment directly from client accounts. WFG then receives its fee from Betterment Securities as the custodian of the client account; WFG does not directly deduct the advisory fees.

### **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by WFG. Please see Item 12 of this brochure regarding broker/custodian.

### **D. Prepayment of Fees**

WFG collects its fees in arrears and advance. Refunded fees will be returned within fourteen days by check mailed to the client.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither WFG nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

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

WFG does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

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

WFG generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

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

There is no account minimum.

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

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

WFG's methods of analysis include charting analysis, fundamental analysis, and technical analysis.

**Charting analysis** involves the use of patterns in performance charts. WFG uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

**Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

**Technical analysis** involves the analysis of past market data; primarily price and volume.

#### *Investment Strategies*

WFG uses long term trading, short term trading strategies and options writing (including covered options).

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### B. Material Risks Involved

#### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical analysis** attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

## ***Investment Strategies***

Long term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **C. Risks of Specific Securities Utilized**

WFG generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

**Equity** investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

**Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

**Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.

**Stocks & Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**REITs** have specific risks including valuation due to cash flows, dividends paid in stock rather than cash, and the payment of debt resulting in dilution of shares.

**Private placements** carry a substantial risk as they are largely unregulated offerings not subject to securities laws.

**Long term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment 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, market risk, and political/regulatory risk.

**Short term trading** risks include liquidity, economic stability and inflation.

**Options** have risks which include selling an equity position at a lower than market price if a covered call has been written. Buying options have the risk of the option expiring worthless if the security does not appreciate or depreciate within the time of the option expiration beyond the strike price of the option.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

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

Neither WFG nor its representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

Neither WFG nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Keith D. Weiss is an accountant and Richard and Scott G. Weiss are licensed insurance agents. However, neither Richard nor Scott are currently appointed with any insurance agency or company and do not collect any commissions on the sale of insurance products.

WFG provides complementary tax service to some of its clients through its affiliate, Weiss Advisory Group. The service is only provided on a complementary basis to clients who had a pre-existing relationship with firm's owners prior to the formation of the firm and who have a threshold amount of assets under management with the firm.

### **D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections**

WFG may direct clients to third-party investment advisers. WFG charges a fee to its clients as described in Item 5 separate from the fee charged by the third-party adviser. The total fees will not exceed any limit imposed by any regulatory agency. WFG will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. WFG will ensure that all recommended advisers are licensed or notice filed in the states in which WFG is recommending them to clients.

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

### **A. Code of Ethics**

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

### **B. Recommendations Involving Material Financial Interests**

WFG does not recommend that clients buy or sell any security in which a related person to WFG or WFG has a material financial interest.

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of WFG may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of WFG to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. WFG will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of WFG may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WFG to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. WFG will always transact client's transactions before its own when similar securities are being bought or sold.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

We recommend Schwab Institutional and MTG, LLC dba Betterment Securities ("Betterment Securities"), as custodians to our clients. Schwab Institutional, a division of Charles Schwab & Co., Inc., was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. WFG will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

For our clients' accounts that Betterment Securities maintains, Betterment Securities generally does not charge you separately for custody services, but is compensated as part of the

Betterment Institutional (defined below) platform fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having Betterment Securities execute trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

### **1. *Research and Other Soft-Dollar Benefits***

WFG receives research, products, or other services from its broker/dealer or another third-party in connection with client securities transactions (“soft dollar benefits”). There is no minimum client number or dollar number that WFG must meet in order to receive free research from the custodian or broker/dealer. There is no incentive for WFG to direct clients to this particular broker-dealer over other broker-dealers who offer the same services. However, because this firm does not have to produce or pay for services or products it has an incentive to choose a custodian that provides those services based on its interests rather than the clients’ interests. The first consideration when recommending broker/dealers to clients is best execution. WFG always acts in the best interest of the client.

Betterment Securities serves as broker dealer to Betterment Institutional, an investment and advice platform serving independent investment advisory firms like us (“Betterment Institutional”). Betterment Institutional also makes available various support services which may not be available to Betterment’s retail customers. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Betterment Institutional’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Betterment Institutional’s support services:

**SERVICES THAT BENEFIT YOU.** Betterment Institutional includes access to a range of investment products, execution of securities transactions, and custody of client assets through Betterment Securities. Betterment Securities’ services described in this paragraph generally benefit you and your account.

**SERVICES THAT MAY NOT DIRECTLY BENEFIT YOU.** Betterment Institutional also makes available to us other products and services that benefit us, but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts, such as software and technology that may:

- Assist with back-office functions, recordkeeping, and client reporting of our clients’ accounts.
- Provide access to client account data (such as duplicate trade confirmations and account statements).
- Provide pricing and other market data.
- Assist with back-office functions, recordkeeping, and client reporting.

**SERVICES THAT GENERALLY BENEFIT ONLY US.** By using Betterment Institutional, we will be offered other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events.
- Consulting on technology, compliance, legal, and business needs.

- Publications and conferences on practice management and business succession.

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

WFG receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

WFG will not allow clients to direct WFG to use a specific broker-dealer to execute transactions. Clients must use WFG recommended custodians (broker-dealers).

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

WFG maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing WFG the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

## **Item 13: Reviews of Accounts**

### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

Client accounts are reviewed on an on-going-as-needed basis by Keith D. Weiss or Scott G. Weiss. The chief advisors are instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at WFG are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Keith D. Weiss or Scott G. Weiss. There is only one level of review and that is the total review conducted to create the financial plan.

### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least monthly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian. WFG will also provide quarterly investment progress reports independent of Schwab.

Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

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

### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

WFG receive a non-economic benefit from Betterment Institutional and Betterment Securities in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Betterment Securities. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to us of Betterment Institutional and Betterment Securities' products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

### **B. Compensation to Non - Advisory Personnel for Client Referrals**

WFG does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

When advisory fees are deducted directly from client accounts at client's custodian, WFG will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy. Clients will also receive statements from WFG and are urged to compare the account statements they received from custodian with those they received from WFG.

## **Item 16: Investment Discretion**

For those client accounts where WFG provides ongoing supervision, the client has given WFG written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides WFG discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

## **Item 17: Voting Client Securities (Proxy Voting)**

WFG will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## **Item 18: Financial Information**

### **A. Balance Sheet**

WFG does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

### **B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither WFG nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

WFG has not been the subject of a bankruptcy petition in the last ten years.

## **Additional Information**

WFG may hold seminars on various topics in the future. WFG may allow some issuers of securities to sponsor a portion of the expenses of the seminar. WFG will not place assets of clients in an issuer's securities because of their sponsorship of a seminar event. WFG will act in a fiduciary capacity as a registered investment adviser and place a client's assets in appropriate investments as determined by a financial plan or client investment policy statement.