



WWA PLANNING & INVESTMENTS
Firm ADV 2A Disclosure Brochure
(CRD # 281159)

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January 1, 2023

This Form ADV Part 2A Brochure (or "Brochure") provides information about the qualifications and business practices of Wisdom Wealth Abundance, LLC d/b/a WWA Planning & Investments, an investment advisory firm registered with the state of Indiana. If you have any questions about this Brochure's contents, please contact us at 812-379-1120.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or any state securities authority. Nothing in this document is to be construed as a recommendation or an endorsement by the SEC or any state securities authority or an offer of securities; please refer to the actual investment offering and related legal documentation for complete disclosures. Registration with the SEC or any reference to or use of the terms "registered investment adviser" or "registered" does not imply that WWA Planning & Investments or any associated person has achieved a certain level of skill or training. Investments involve risk, including the possible loss of principal. An adviser's written and oral communications provide you with information to determine whether to retain their services. This Brochure is on file with the appropriate regulatory authorities as federal and state regulations require.

Additional information about WWA Planning & Investments is available on the SEC's website at www.adviserinfo.sec.gov.

*(Click on the link, select "Investment Adviser- Firm," and type in the firm name or CRD # 281159.
Results will provide you with WWA Planning & Investments disclosure Brochures.)*

Item 2: Summary of Material Changes

WWA Planning & Investments ("WWA") reviews its Form ADV Part 2A Brochure at least annually to confirm it remains current. In this item, we are required to summarize only those material changes made to our Brochure since our last annual updating amendment. If you are receiving this document for the first time, this section may not be relevant to you.

Since our last annual updating amendment of March 30, 2022, we have made the following material changes to our Form ADV:

Item 4: Advisory Business

Assets Under Management

WWA offers its advisory services on an *assets-under-advisement, discretionary and non-discretionary* basis. As of December 31, 2022, WWA had \$11,709,719 assets-under-advisement, and \$63,315,594 under management, of which \$63,181,552.00 were discretionary, and \$134,042.00 were non-discretionary.

Item 5: Fees & Compensation

We updated our Fee Schedule for client account assets of \$600,000 or less in AUM to the following:

Annual "Age-Based" Fee Schedule*

Client Age	1 st Year	2 nd Year & Beyond Base Fee Plus % of AUM	
20 - 30 years	\$2,400	\$1,200	Plus 1% of AUM
30 - 40 years	\$3,600	\$1,500	
40 - 50 years	\$5,400	\$2,100	
50 - 60 years	\$6,000	\$2,200	
60+ years	\$6,000	\$4,000	

**Lower fees for comparable services can sometimes be available from other sources.*

Full Brochure Availability

We may, at any time, amend this document to reflect changes in WWA's business practices, policies, procedures, or updates as mandated by securities regulators. Annually and as necessary due to material changes, we will provide clients (either by electronic means or hard copy) with a new Brochure or a summary of material changes from the document previously supplied, with an offer to deliver our full Brochure upon request. Please retain this for future reference as it contains essential information concerning our advisory services and business.

You can view our current disclosure documents at the SEC's Investment Adviser Public Disclosure ("IAPD") website at <http://www.adviserinfo.sec.gov> by searching by our firm name or CRD # 281159. The SEC's website also provides information about any WWA-affiliated person registered or required to be registered as an Investment Adviser Representative of the firm. You may also request a copy free of charge by contacting us at 812-379-1120 or by e-mail at jalene@WWAfp.com.

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Item 4: Advisory Business

Description of Firm

WWA Planning & Investments ("WWA" or "the Adviser") is a registered investment adviser based in Columbus, IN. Organized as a limited liability company ("LLC") under the laws of the state of Indiana, the firm, located at 427 Washington Street, Columbus, Indiana 47201, has been in business since October 7, 2015. WWA is wholly owned by its Principal and President, Jalene Kaye Thompson Hahn, who undertakes all of the firm's significant strategic and administrative decisions. *(Please refer to Ms. Hahn's Form ADV Part 2B Brochure Supplement for additional formal education and business background details.)*

As used in this Brochure, the words "we," "our," and "us" refer to WWA Planning & Investments and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm. The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our services to your needs.

Types of Advisory Services

WWA is a fee-only investment management and financial planning firm; it does not sell securities on a commission basis. WWA's investment professionals emphasize continuous personal client contact and interaction in providing the following types of investment advice and advisory services:

1. Financial Planning Services
2. On-Going Financial Planning & Investment Management Services
3. Hourly & Fixed-Fee Consulting Services
4. Educational Seminars & Workshops Services

WWA's advisory services are designed and aimed to complement each client's specific needs, as described within its written services contracts (the "Advisory Agreement," "Agreement," or "contract") that disclose, in substance, the scope of service, contract term, advisory fee - or formula for computing the fee, amount or manner of calculation of any pre-paid fee to be returned to the client in the event of non-performance or contract termination, and type of discretionary power granted to WWA. Final advisory fee structures are documented within the written Agreement. Use of our ongoing financial planning and investment management services is not required of those who wish to use personal financial planning services. However, we believe clients who use both are best served.

Advisor Representatives are restricted to providing the services and fees specified within each contract, subject to the client's listed objectives, limitations, and restrictions. Contracts must be completed and executed to engage in WWA's advisory services. Clients may engage WWA for additional services at any time. *(Please refer to Item 5: Fees & Compensation and Item 16: Investment Discretion for further details on advisory services fees and account management styles.)*

WWA's advisory services are made available to clients primarily through individuals associated with the firm as Advisor Representatives. For more information about the investment professional providing advisory services, clients should refer to their Investment Adviser's Form ADV 2B Brochure Supplement, a separate disclosure document that their WWA Associate offers, along with this Brochure before or at the time of relationship inception. If the client did not receive an ADV 2B Brochure Supplement, they should contact their Advisor Representative or WWA directly. *(Note: Advisor Representatives are required by applicable rules and policies to obtain licenses and complete training to recommend specific investment products and services. Clients should be aware that their Advisor Representative may or may not recommend certain services, investments, or models depending on the licenses or training obtained; they may transact business or respond to inquiries only in the state(s) in which they are appropriately qualified.)*

Client Responsibilities

WWA's advisory services depend on and rely upon the information received from clients. The Adviser cannot adequately perform its obligations and fiduciary duties to the client unless the client discloses an accurate and complete representation of their financial position and investment needs, timely remits requested data or paperwork, provides updates promptly upon changes, and otherwise fulfills their responsibilities under their Agreement. Advisor Representatives will rely upon the accuracy of information furnished by the client or their behalf without further investigation. WWA will not be required to verify the information obtained from clients or other professional advisors, such as accountants or attorneys. Clients will acknowledge and agree to their obligation to promptly notify WWA in writing if any information material to the advisory services to be provided changes, information previously provided that might affect how their account should be managed occurs, or if earlier disclosed data becomes inaccurate. *(Please refer to "Conflicts of Interest" at the end of this section for other important disclosures, Items 5: Fees & Compensation, and 10: Other Financial Industry Activities & Affiliations for additional important information.)*

Following is a summary description of advisory services covered by this Brochure. Clients should consult with their Advisor Representative and the applicable client Agreement and fee schedules for additional information regarding each service.

Financial Planning Services

WWA offers comprehensive personal **financial planning services** and limited engagement projects for a fee. Services can range from broad-based financial planning to consultative or single-subject planning.

The financial planning process begins with a series of discussions that helps us identify and clarify your financial resources and, most important, how you make decisions. Planning blends your goals, values, and dreams with fact-based analysis of cash flow and taxes, assets and liabilities, risk management, estate and retirement planning, and investments. Plan development takes an evidence-based approach. The key elements of the tailored, comprehensive financial plan include risk management (insurance), budgeting, debt management, saving, retirement planning, tax strategies, estate planning and investments. Other services focus on guiding clients through life transitions of widowhood, divorce, getting started and planning for college. Additionally, we provide hourly financial planning services.

If you retain our firm for financial planning services, we will meet with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position and define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we will develop shorter-term, targeted objectives. Clients will execute a Financial Planning Agreement setting forth the terms and conditions of the engagement - including termination, describing the scope of the services to be provided and the fixed or hourly fees due before services commence. The final fee structure will be documented within the executed Agreement.

Clients are provided access to an online secure personal financial dashboard that allows them to tell us more about their situation and aid in uploading helpful documents to a secure, online storage vault. Once we review and analyze the information you provide to our firm and the data presented, we will deliver a written plan to help you strive to achieve your stated financial goals and objectives. Financial plans are based on your financial situation when we present the plan to you and on the financial information you provide. Clients are under no obligation to act on our financial planning recommendations. Should they act on our advice, they are not obligated to implement the financial plan through our other investment advisory services. Moreover, they may act on our recommendations by placing securities transactions with any brokerage firm.

Depending on the scope of the assignment and the complexity of the planning to be performed or advice to be given, financial planning services can take approximately 6 – 8 weeks to six months. Engagements follow the same process but are differentiated by the scope and depth of the areas addressed, analysis complexity, recommendations developed, deliverables created, and presentation. Clients will continue to have access to their online dashboard for six months following the conclusion of the engagement.

Retirement Readiness Appraisal

Our Retirement Readiness Appraisal is part of our financial planning services. The appraisal is a one-time, two-hour consultation designed for anyone close to retirement who thinks they are ready to retire but wants to make sure. The one-time consultation assists those that do not want the conflicts in commission-based planning and/or the expense of a complete financial plan. Clients receive two hours of intensive work with a Certified Financial Planner® professional focused on their unique situation. Areas of review may include but are not limited to retirement expectations and concerns, goal development and review for topics such as retirement age and income needs, healthcare cost estimates, travel, major purchases, and retirement income sources - including a discussion of social security, current investment asset review and development of target allocation and identification of strategies to aid in achieving success.

In-Depth Financial Planning

In-depth financial planning is offered in complex situations requiring strategic analysis in several areas.

Regardless of the type of service chosen, WWA will not have investment authority when offering financial planning consulting services. The services do not include implementing or monitoring any recommendations provided to the client. Stand-alone engagements do not contain advice on specific individual investments, income tax preparation, gift or estate tax returns, or legal documents, including wills or trusts. Specific investment recommendations are considered part of the implementation phase of the relationship and are only available through an ongoing relationship. If the client receives a written financial plan, the plan will not include information or analysis on liability risks, tax planning, or tax preparation services. If such services are necessary, the client shall be responsible for obtaining them from one or more third parties; WWA does not provide legal or tax advice.

Financial planning engagements terminate upon delivery of the written plan.

Additional reviews may be conducted upon your request, and written updates to the financial plan may be provided in conjunction with the review. Updates to financial plans may be subject to WWA's then-current hourly rate, which the client must approve in writing and in advance of the update.

Financial planning services may be the only service provided to the client. Executing an Agreement neither constitutes an agreement for nor requires that the client use or purchase investment advisory or other services offered by WWA or any other products or services provided by any advisory Associate due to any business activities in which they may participate outside their advisory activities with the Adviser. As with all WWA advisory services, the expectation is that the client will promptly notify the Adviser in writing of any material changes in assets, net worth, indebtedness, or planning objectives that the Adviser would not otherwise know. The client or their successor shall also promptly notify us in writing of (a) the dissolution, termination, merger, or bankruptcy of the client if the client is other than a natural person and (b) the occurrence of any other event which might affect the validity of their Financial Planning Agreement or WWA's authority thereunder.

WWA reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in its judgment, to provide proper financial advice. Clients should consult their Agreement for complete details.

Ongoing Financial Planning & Portfolio Management Services

Clients may prefer an ongoing relationship for assistance in financial planning and implementation. In addition to ongoing investment management, WWA's **ongoing financial planning and portfolio management services** offer regular plan updates and check-ins and include a proactive aging component.

Ongoing financial planning and portfolio management services clients will undergo an initial interview and discussion to outline their current financial situation, establish risk tolerance, and determine their investment objectives to create a customized investment plan for portfolio management. Multiple aspects of the client's financial affairs are reviewed, with realistic and measurable goals set based on the disclosed information and objectives to define those goals. The details of the advisory relationship and final advisory fee structure are documented within the client's written Agreement.

Clients participating in this service will grant WWA discretionary authority to manage their accounts. The discretionary authorization allows your Advisor Representative to determine the specific securities and the amount of securities purchased or sold for your account without your approval before each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. Clients may limit our discretionary authority by providing WWA with their restrictions and guidelines in writing.

As part of our portfolio management services and other investments, we may invest your assets according to one or more model portfolios developed by our firm. These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment strategy to a more conservative investment approach. Clients whose assets are invested in model portfolios may not set restrictions on the specific holdings or allocations within the model nor the types of securities purchased. While we will adhere to the agreed-upon investment portfolio and approach, clients may impose restrictions on investing in particular securities or types of securities in their accounts, such as restricting the sale of specific assets or requesting an ESG approach. In such cases, this may prevent a client from investing in certain models that our firm manages. Upon receiving a client's written restrictions, WWA will discuss the restriction request's feasibility to ensure expectations are met and confirm the client's acknowledgment and understanding of imposed restriction's possible outcomes. If client-imposed restrictions prevent a client's account's proper servicing or their conditions require substantial deviations from recommendations, WWA reserves the right to end the client relationship. *(See Item 8: Methods of Analysis, Investment Strategies & Risk of Loss, Client Imposed Restrictions for additional details.)*

As account goals and objectives will often change over time, suggestions are made and implemented ongoing as the client and Advisor Representative review their financial situation and portfolio through regular contact and annual meetings to determine fluctuations in their financial situation or investment objectives, confirm realistic restrictions on account management, and verify if the client wishes to modify any existing restrictions reasonably. Clients should consult their Advisory Agreement for complete details.

ERISA, Retirement & Other Qualified Accounts

WWA can advise on ERISA, retirement and other qualified accounts as part of its ongoing financial planning and portfolio management services. Effective December 20, 2021 (or such later date as the U.S. Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are 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. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interests ahead of yours. Under this special rule's provisions, we must:

- meet a professional standard of care when making investment recommendations (*give prudent advice*),
- never put our financial interests ahead of yours when making recommendations (*give loyal advice*),
- avoid misleading statements about conflicts of interest, fees, and investments,
- follow policies and procedures designed to ensure that we provide advice that is in your best interest,
- charge no more than is reasonable for our services, and
- give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice for because the assets increase our assets under management and, in turn, our advisory fees. We will only recommend a rollover when we believe it is in your best interest as a fiduciary. It is essential that you understand the differences between these accounts and decide whether a rollover is best for you. Before proceeding, if you have questions, contact your Adviser Representative, or contact us at 812-379-1120.

IRA Account Rollover Considerations

As part of our investment advisory services, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA subject to our management, we will charge you an asset-based fee outlined in the Agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf are incentivized to recommend a rollover to generate fee-based compensation rather than solely based on your needs. You are contractually or otherwise under no obligation to complete the rollover. Moreover, if you complete the rollover, you are not obligated to have the assets in an IRA managed by WWA.

Many employers permit former employees to keep their retirement assets in their company plans. Further, current employees can sometimes move assets from their company plan before retiring or changing jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should carefully consider the costs and benefits of:

1. leaving the funds in your employer's/former employer's plan,
2. moving the funds to a new employer's retirement plan,
3. cashing out and taking a taxable distribution from the plan, and
4. rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages. Before making a change, we encourage you to speak with your CPA or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage, the following are additional points for consideration before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might wish to consider other investment types.
 - Employer retirement plans generally have a more limited investment menu than IRAs.
 - Employer retirement plans may have unique investment options not available to the public, such as employer securities or previously closed funds.
2. Your current plan may have lower fees than our fees.
 - If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs compare with those available in an IRA.
 - You should understand the various products and services you might use at an IRA provider and the potential costs.
3. Our strategy may have a higher risk than your plan's option(s).
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 72.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been largely protected from creditors in bankruptcies. However, there can be some exceptions to the usual

rules, so you should consult an attorney if you are concerned about protecting your retirement plan assets from creditors.

7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed anytime; however, distributions are subject to ordinary income tax and may be subject to a 10% early distribution penalty unless they qualify for an exception, such as disability, higher education expenses, or a home purchase.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

General Disclosure Regarding ERISA, Retirement & Other Qualified Accounts

If an advisory account is subject to the provisions of ERISA or certain tax-deferred treatment under the Internal Revenue Code (collectively, "Qualified Accounts"), WWA and its Advisor Representatives, who act as fiduciaries by providing investment advice for such Qualified Accounts, are generally prohibited from receiving both an advisory fee and any transaction-based compensation unless in compliance with applicable prohibited transaction exemptions under ERISA or the IRC or authorized by the U.S. Department of Labor.

Clients will represent that the Qualified Account and any instructions they give are consistent with applicable plan documents, including investment policies, guidelines, or restrictions. They will provide us with a copy of all relevant documents and agree that their selected advisory program is consistent with those documents. And will notify us, promptly in writing, of any changes to any of the plan's investment policies, guidelines, restrictions, or other plan documents about investments by the plan. If the assets in the Qualified Account constitute only a part of their plan assets, they will provide us with documentation of any of the plan's investment guidelines or policies that affect it. The compliance of any recommendation or investment WWA's Advisor Representatives make for the Qualified Account with any such investment guidelines, policies, or restrictions shall only be determined on the date of the recommendation or purchase. The client is responsible for providing us prompt written notice if any investments made for the Qualified Account are inconsistent with such guidelines, policies, restrictions, or instructions.

Clients understand that our services shall not affect plan assets not held in the Qualified Account and that WWA shall have no responsibility for such other assets. WWA is not responsible for plan administration or performing duties not expressly outlined in the Advisory Agreement. Further, the client is responsible for obtaining and maintaining (at their own expense) any insurance or bonds they deem necessary to cover themselves and any of their affiliates, officers, directors, employees, and agents in connection with WWA's Advisory Agreement.

Hourly & Fixed Fee Consulting Services

WWA provides consulting **hourly and fixed-fee consulting services**, on investment and non-investment-related matters, on a stand-alone separate fee basis, available for clients who need advice on a limited scope of work. Hourly planning consultations are generally reserved for former planning and investment clients whose circumstances have changed and who are looking for the impact or clarification of those circumstances on prior advice.

Fixed fee consulting services generally include presentations sponsored by an employer for employees regarding financial benefits or explaining investment alternatives in an employer-sponsored plan. Consulting services are available for companies reviewing or establishing ERISA plans and options.

If requested by the client, WWA may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and can accept or reject WWA's recommendation regarding this or any other WWA advisory services they engage. This type of service also does not constitute an agreement for client management or advisory services. The client is responsible for determining whether to implement any recommendations made by the Advisor Representative and placing any resulting transactions. After engagement completion, ongoing consulting or management services are not provided. Clients should consult their Agreement for complete details.

Educational Seminars & Workshops Services

WWA provides complimentary investment **educational seminars and workshops** and is a frequent speaker at various community events and conferences on various investment topics on an "as-announced" basis for groups seeking general instruction on investments and other personal finance areas. Seminar and workshop content will vary depending upon the attendees' needs and are purely educational – they do not involve selling any investment products. The information presented will not be based on any particular individual's needs. WWA does not provide personalized investment advice to attendees during such events. WWA will only provide investment advice if engaged independently and only where the attendee's individualized financial information, investment goals, and

objectives are known. Any materials provided are for general educational purposes and do not deliver specific accounting, investment, legal, tax, or professional advice. Attendees have no obligation to schedule a consultation, purchase services from WWA, or become clients.

Client Tailored Services

WWA offers the same suite of services to all its clients. However, some clients will require only limited services due to the nature of their investments. Limited services are discounted at WWA's discretion, as detailed herein and defined in each client's written Agreement.

Types of Investments

The types of investments on which WWA provides advice include, but are not limited to, stocks, bonds, mutual funds, exchange-traded funds, hedge funds, venture capital opportunities, derivative debt and equity securities, private and public REITs, and other partnership interests such as those investing in mortgages. We may also offer advice on different investments, such as business opportunities. As a general rule, WWA does not recommend clients invest in initial public offerings (IPOs), leveraged ETFs, oil & gas limited partnerships, purchase securities using margin accounts or participate in short sales or options. But occasionally, these may be appropriate.

The vast majority of investments recommended by WWA are no-load mutual funds, exchange-traded funds, individual stocks and bonds or equivalent investment products. The investment selection offered to clients may be limited by the knowledge and experience of the personnel of WWA and/or the resources available to it due to its custodial and other industry provider relationships in the broader financial industry. Further, due to these resources, certain investments may be available to clients of WWA that might not be available to members of the public at large. WWA believes that the choices available under these restrictions are sufficiently wide to effectively make available the full range of investment options that might conceivably be important for all but the rarest client. Suitable investment categories are selected according to the client's attitudes about risk and their need for capital appreciation or income production, with tax considerations of all transactions weighted heavily. Within each category, individual securities are selected whose characteristics are most consistent with the particular objectives for which the category was chosen. Risk factors of the different investments are considered, particularly in light of the client's willingness to assume risk and the client's ability to withstand investment losses. We also work with individuals regarding preferences for using Environmental, Social, and Governance ("ESG") investments ~~socially~~ ~~responsible investing~~ when requested.

Although we predominantly provide advice on the products listed above, WWA reserves the right to advise on any investment product deemed suitable for a client's specific circumstances, needs, and individual goals and objectives and will use other securities as necessary to help diversify a portfolio when applicable and appropriate. Additionally, we may advise on other investments held in the portfolio at the inception of the advisory relationship. Since investment strategies and advice are based on each client's specific financial situation, the advice we provide to one client may differ or conflict with that provided for the same security or investment for another. *(See Item 8 - Methods of Analysis, Investment Strategies & Risk of Loss.)*

Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Client Imposed Restrictions

Clients may impose restrictions on investing in particular securities or security types according to their preferences, values, or beliefs. Such restrictions must be submitted to WWA in writing. Reasonable efforts are used to comply with client investment guidelines, including any client's reasonable limits by standard industry practices. In imposing restrictions, it is essential to note that such conditions can affect a client's account performance and result in variations from a similarly managed account without restrictions. Client imposed restrictions within their account, and variations could result in positive or negative performance differences for the account compared to the investment program's performance composite. Investment structures recommended can also prevent controlling a client's specific outcome.

In no event and regardless of the advisory service provided is the Adviser obligated to make any investment or enter any transaction it believes in good faith would violate any federal or state law or regulation.

Wrap Fee Programs

A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a client's account are charged for investment supervisory services, which may include portfolio management or advice concerning the selection of other investment advisers and the execution of client transactions. WWA does not offer a wrap fee program as part of its advisory services.

Conflicts of Interest

Clients are under no obligation to act upon any recommendations or purchase any additional products or services offered. If they elect to act on any recommendation received, they are not obligated to place the transaction through WWA or any recommended third party. The client may act on recommendations received by placing their business and securities transactions with any brokerage of their choice. WWA does not represent that the products or services offered are at the lowest available cost - clients may be able to obtain the same or similar products or services at a lower price from other providers.

Additional details of how WWA mitigates conflicts of interest can be found in the Adviser's comprehensive written compliance supervisory policies and procedures and Code of Ethics ("Code"). WWA's Code is available for review free of charge to any client or prospective client upon request.

Assets Under Management

WWA offers advisory services on a *discretionary*, *non-discretionary*, and *assets-under-advisement* basis. As of December 31, 2022, WWA had \$11,709,719 assets under advisement, and \$63,315,594 under management, of which \$63,181,552.00 were discretionary and \$134,042.00 were non-discretionary.

Item 5: Fees & Compensation

Description of Advisory Fees

WWA strives to provide the most cost-effective investment strategy for our investment management clients. WWA advisory clients agree to pay an asset-based advisory fee calculated according to the fee schedules indicated herein. *(Please note that under the Investment Advisers Act of 1940's "Brochure Rule," investment advisors must provide a written disclosure statement to their clients. A copy of WWA's Form ADV Part 2A Brochure and the applicable Advisor Representative's Part 2B Brochure Supplement(s) will be provided to clients before or upon execution of an Advisory Agreement. Unless a client has received these important disclosure documents at least 48 hours before signing their Advisory Agreement, they may terminate their Agreement with WWA within five (5) business days of Agreement execution without incurring any advisory fees. Advisers offering impersonal investment advice paid less than \$500 annually do not have to adhere to the Brochure Rule with a client.)*

The following describes how WWA is compensated for each of its advisory services:

Financial Planning Services Fees

WWA fees for comprehensive and limited-engagement personal **financial planning services** range between \$800 to \$5,600. Hourly financial planning services are provided at a rate of \$280. Our **Retirement Readiness Assessment** appraisal is for those who think they are ready to retire but are looking for confirmation or understand retirement options. Designed for anyone close to retirement, this is a one-time two-hour consultation for \$800. Our **In-Depth Financial Planning** service offers planning for more complex situations requiring in-depth analysis in several areas. Fees range between \$1,200 and \$5,600 depending on intricacy. All fees are negotiable depending on the plan's scope, complexity, and the client's situation and financial objectives.

Clients will pay 50% of the estimated fee in advance or \$500, whichever is less, and the remaining portion upon completing services rendered. WWA does not require the payment of fees six or more months in advance. Further, should an engagement last longer than six months between financial planning agreement acceptance and delivery, WWA will promptly return any pre-paid unearned fees less a pro-rata charge for bona fide financial planning services rendered to date.

A total time/cost estimate will be determined at the relationship's inception. Since financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. If the client's situation differs substantially from the initial meeting, a revised fee will be provided for agreement. When a fee increase is necessary, the client must approve and agree to the scope change before any additional work is performed. In such cases, we will notify you to obtain this approval. Clients will choose how they wish to be billed. WWA does not deduct financial planning services fees directly from the client's assets; clients have invoiced fees for these services as they are incurred, as defined in each client's Agreement. Upon receipt of WWA's invoice, payments are due and may be remitted by check, credit, or debit card.

Clients may terminate their financial planning agreement upon written notice to our firm. If pre-paid financial planning fees are not yet earned, WWA will promptly refund the client their prorated fees. If financial planning fees are payable in arrears, they will be responsible for a prorated fee based on services performed before the termination of the financial planning agreement. At our discretion, we may offset our financial planning fees to the extent clients implement the financial plan through our Portfolio Management Service.

Ongoing Financial Planning & Portfolio Management Services

Fees for **ongoing financial planning and portfolio management services** for clients with investable assets of over \$600,000 are determined by a percentage of assets under management, the number of client accounts, complexity of their financial situation, and planning needs. WWA will not require prepayment of a fee more than six months in advance and in excess of \$500.

Client Account Assets of \$600,000+

The annual ongoing financial planning and portfolio management services fee is billed quarterly and payable in advance. The flat annual fee, effective April 1st, is reset each year and is roughly based on the Annual Fee Schedule table below using year-end market values, the number of client accounts, planning complexity and the need for specialized services, for example, business consulting or Global Financial Planning implications. Fees are reviewed with clients annually in the first quarter, and the new fee is effective with the 2nd quarter's billing. Annual fees are payable in quarterly installments based on the billing cycle month of account inception. *(For example, if an Agreement is signed in March, the assets may not be transferred to the new account until the middle of April. Therefore, billing would start in May. Billing will begin on an agreed-upon month and allow assets to be deposited or transferred. Fees are not adjusted in the middle of the year if the client transfers out or adds assets; additions and withdrawals are included in the year-end calculation.)*

Annual Fee Schedule

Assets Under Management	Annual Fee*
First \$0 - \$1,000,000	1.00%
Assets between \$1,000,001 - \$2,000,000	0.85%
Assets between \$2,000,001 - \$3,000,000	0.75%
Assets between \$3,000,001 - \$4,000,000	0.65%
Assets between \$4,000,001 - \$5,000,000	0.55%
Assets \$5,000,001 and above	0.50%

*Lower fees for comparable services can sometimes be available from other sources.

Client Account Assets of \$600,000 or Less

Although WWA does not require a minimum asset level as a prerequisite for client relationships, we ask clients with an asset base of less than \$600,000 to pay an age-based minimum as follows:

Annual "Age-Based" Fee Schedule*

Client Age	1 st Year	2 nd Year & Beyond Base Fee Plus % of AUM	
20 - 30 years	\$2,400	\$1,200	Plus 1% of AUM
30 - 40 years	\$3,600	\$1,500	
40 - 50 years	\$5,400	\$2,100	
50 - 60 years	\$6,000	\$2,200	
60+ years	\$6,000	\$4,000	

*Lower fees for comparable services can sometimes be available from other sources.

The above advisory fees are negotiable and may differ depending on individual clients' unusual circumstances. At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. *(For example, we may combine account values for the client, their minor children, joint accounts with a spouse, and other related accounts. Combining account values may increase the asset total, resulting in the client paying a reduced advisory fee based on the available breakpoints in our fee schedules stated above.)*

WWA will deduct ongoing financial planning and portfolio management services client advisory fees directly from their account at the qualified custodian holding their funds and securities where possible. Fees will only be deducted when the following requirements are met:

1. the client provides us with written authorization permitting the fees to be paid directly from your account held by the qualified custodian,
2. we send an invoice showing the amount of the fee, the value of the assets on which the fee is based, the period covered by the fee, the specific manner in which the fee was calculated, and
3. the qualified custodian agrees to send the client a statement, at least quarterly, indicating all amounts disbursed from the account, including the amount of the advisory fee paid directly to our firm.
4. Fees are no more than 3% of combined assets held with our preferred custodian.

The client will be invoiced if we cannot deduct the fees directly from our custodian.

The client may terminate the ongoing financial planning and portfolio management services agreement upon ten business days prior notice. Notice of termination must be given in writing and delivered to the appropriate party's last known address. Refunds will be made within 15 days of account transfer or closure and pro-rated monthly for accounts transferred or closed with appropriate notice. Clients will only pay advisory fees in proportion to the number of days in the quarter for which they were a client. This means if the client has pre-paid advisory fees not yet earned, they will receive a prorated refund of those fees. In some instances, clients may terminate their Agreement without prior notification.

Hourly & Fixed Fee Consulting Services Fees

Hourly and fixed fee consulting services are provided for either a flat, fixed fee computed on a project basis or a negotiable hourly fee, as defined in each client's written Agreement. WWA offers advice on single-subject financial planning and general consulting services for an hourly fee of \$280, which is negotiable depending on the scope and complexity of the plan, the client's situation, and financial objectives. At the start of the advisory relationship, an estimate of the total time/cost will be determined and indicated in the client's Agreement. Should the cost/time exceed the initial assessment, WWA will notify the client, request, and obtain approval for the additional fee before continuing services.

Client fees are billed and payable within ten (10) days of invoice presentation upon completing any hourly and fixed-fee consulting services. Clients can choose how they wish to be billed. They may authorize their custodian to directly deduct advisory fees from their custodial account or pay them via check. If a fixed-fee project terminates before completion, WWA will determine the project's percentage based on the hourly rate and the number of hours already expended. If less than one-half of the project is finished, a refund will be made for any unearned fees. If more than one-half of the project is complete, the client will be invoiced for the additional time expended over fees already paid. WWA will invoice the client for any work finalized through the termination date if an hourly agreement is terminated before completing agreed-upon services. Clients should refer to their Agreement for more detail.

Educational Seminars & Workshop Fees

Educational seminars and workshops are complimentary and provided free of charge.

Additional Fees & Expenses

As part of our investment advisory services, we may invest in mutual and exchange-traded funds or recommend that you invest. The fees you pay our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange-traded funds (as described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. The broker-dealer or custodian typically imposes these charges and fees through whom your account transactions are executed. We do not share any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian.

To fully understand the total cost, you should review all the fees charged by mutual funds, exchange-traded funds, our firm, and others. (See *Item 12: Brokerage Practices* for more information on these practices.)

Item 6: Performance-Based Fees & Side-By-Side Management

Performance-based fees are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. WWA does not accept performance-based fees or participate in side-by-side management; avoiding such conflict is paramount in maintaining our fiduciary duty to our clients. (See *Item 5: Fees & Compensation above* for exact fee details.)

Item 7: Types of Clients

Client Base

WWA offers investment advisory services to:

- individuals (*other than high net-worth individuals*),
- high net worth individuals,
- pension and profit-sharing plans (*but not the plan participants*), and
- charitable organizations.

Requirements for Opening or Maintaining an Account

In general, WWA does not require a minimum dollar amount to open and maintain an advisory account. However, we will charge a minimum annual fee of \$6,000 to open and maintain an advisory account for clients with assets under management of \$600,000+. And tiered age-based annual fees for clients with assets under management < \$600,000. (Please refer to the Annual "Age-Based" Fee Schedule" above for exact fee amounts.)

WWA retains the right to terminate an account if it falls below a minimum size, which is too small to manage effectively. At our discretion, we may waive the minimum fee. We may also combine account values for you and your minor children, joint accounts with your spouse, and other related accounts to meet the stated minimum.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

Our Methods of Analysis

We use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Charting Analysis - involves the gathering and processing price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data detect departures from expected performance and diversification and predict future price movements and trends. Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security, and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Cyclical Analysis - a technical analysis involving evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and fluctuate between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy, and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and, consequently, the changing value of securities that would be affected by these changing trends.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the actual value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect, and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Modern Portfolio Theory - a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk or equivalently minimize risk for a given level of expected return by carefully diversifying the proportions of various assets. Risk: Market risk is that part of a security's risk common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Technical Analysis - involves studying past price patterns, trends and interrelationships in the financial markets to assess risk-adjusted performance and predict the overall market's direction and specific securities. Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security, and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Investment Strategies

Our investment strategies and advice will vary depending on each client's financial situation as we determine investments and allocations based on their predefined objectives, risk tolerance, time horizon, financial information, liquidity needs, and other suitability factors. Client restrictions and guidelines may affect the composition of their portfolio. In addition to the "Risks of Loss & Other Types of Risks" provided for review herein, the following are additional items for consideration regarding our investment strategies and practices:

Trading - We may use frequent trading (generally selling securities within 30 days of purchasing the same securities) as an investment strategy when managing client account(s). Frequent trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and risk tolerance. This may include buying and selling securities frequently to capture significant market gains and avoid significant losses. Risk: When a frequent trading policy is in effect, there is a risk that

investment performance within an account may be negatively affected, mainly through increased brokerage and other transactional costs and taxes.

ESG Investments - An additional level of scrutiny is added to Environmental, Social, and Governance ("ESG") investments. The purpose is to seek additional risk management and long-term value by investing in companies that positively impact the world and avoid companies that don't take responsibility and care of all stakeholders, including; shareholders, communities, the environment, and the supply chain. ESG screening risks include that it may not encompass all environmental, social or governance issues or may not lead to greater portfolio performance.

Long-Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Using a long-term purchase strategy typically assumes the financial markets will go up in the long term, which may not be the case. There is also the risk of the market segment in which one is invested - or perhaps only one particular investment will decrease over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short term in other investments.

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period, generally less than one year, to strive to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy assumes that we can predict how financial markets will perform in the short term, which may be very difficult and incur disproportionately higher transaction costs than long-term trading. Many factors can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over more extended periods.

It is essential that clients immediately notify us of any material changes to their financial circumstances, including changes in their current or expected income level, tax circumstances, or employment status.

Client Imposed Restrictions

Clients may impose restrictions on investing in particular securities or security types according to their preferences, values, or beliefs. Such restrictions must be submitted to WWA in writing. Reasonable efforts are used to comply with client investment guidelines, including any client's reasonable limits by standard industry practices. In imposing restrictions, it is essential to note that such conditions can affect a client's account performance and result in variations from a similarly managed account without restrictions. Client imposed restrictions within their account, and variations could result in positive or negative performance differences for the account compared to the investment program's performance composite. Investment structures recommended can also prevent controlling a client's specific outcome. In no event and regardless of the advisory service provided is the Adviser obligated to make any investment or enter any transaction it believes in good faith would violate any federal or state law or regulation.

Cash Management

WWA usually invests clients' cash balances in FDIC-insured deposit accounts, money market funds, or FDIC-insured certificates of deposit. In managing the cash maintained in your account, we utilize the sole exclusive cash vehicle (money market) made available by the custodian. Other cash management options may be away from the custodian available with higher yields or safer underlying investments. In most cases, at least a partial cash balance will be maintained in a money market or FDIC-insured deposit account to allow for the debit of advisory fees or anticipated cash distributions to clients. We will manage client account cash balances based on the yield and the financial soundness of money markets and other short-term instruments. *(Please Note: Investment products are usually not FDIC insured, insured by any federal government agency, a deposit, other obligation, or guaranteed by the adviser.)*

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless expressly agreed otherwise in writing, tax efficiency will not be our primary consideration in managing your assets. Regardless of account size or other factors, we strongly recommend that clients consult with a tax professional regarding investing their assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In-First-Out ("FIFO") accounting method for calculating your investments' cost basis. Clients are responsible for contacting their tax advisor to determine if this accounting method is the right choice. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately, and we will alert the account custodian of your individually selected accounting method. Please note that all decisions regarding cost basis accounting are required before trade settlement, as the cost-basis method cannot be changed after settlement.

Risks of Loss & Other Types of Risk

Clients should remember that investing in securities involves a risk of loss that they should be prepared to bear, and past performance does not indicate future results. Over time, assets will fluctuate and be worth more or less than the initial invested amount. Depending on the investment type, differing risk levels will exist. WWA cannot guarantee or promise that a client's financial goals and objectives will be met. When evaluating risk, financial loss may be viewed differently by each client and may depend on many distinct risks, each of which may affect the probability and magnitude of potential losses.

The following risks, which are not all-inclusive, are provided for careful consideration by a prospective client before retaining our services. (*Note: Items are presented alphabetically for ease of reading, not in order of importance.*):

1. **Adviser's Investment Activities** - the Adviser's investment activities involve a significant degree of risk. The performance of any investment is subject to numerous factors that are neither within the control of nor predictable by WWA. As further detailed within this section, decisions made for client accounts are subject to various market, currency, competitive, economic, political, technological, and business risks, and a wide range of other conditions - including pandemics or acts of terrorism or war, which may affect investments in general or specific industries or companies. The securities markets may be volatile, and market conditions may move unpredictably or behave outside the range of expectations, adversely affecting a client's ability to realize profits or resulting in material loss. Client and WWA investment decisions will not always be profitable.
2. **Bank Obligations** - including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are affected by interest rates and may be adversely affected by downturns in the US and foreign economies or banking regulation changes.
3. **Bonds** - corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on the financial health of the issuer, the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" before maturity. When a bond is called, it may be impossible to replace it with a bond of equal character paying the same rate of return.
4. **Bond Funds** - have higher risks than money market funds, primarily because they typically pursue strategies to produce higher yields. Unlike money market funds, the SEC's rules do not restrict bond funds to high-quality or short-term investments. Because there are many different bonds, these funds can vary dramatically in their risks and rewards. Some risks associated with bond funds include credit, interest rate, and prepayment risks.
5. **Business Risk** - is the risks associated with a specific industry or company.
6. **Certificates of Deposit Risk** - certificates of deposit ("CDs") are generally a safe type of investment since they are insured by the Federal Deposit Insurance Company ("FDIC") up to a certain amount. However, because the returns are generally low, there is a risk that inflation outpaces the CD's return. Certain CDs are traded in the marketplace and not purchased directly from a banking institution. In addition to trading risk, the FDIC does not cover the price when CDs are purchased at a premium.
7. **Competition Risk** - the securities industry and advisers' varied strategies and techniques are incredibly competitive. Advisory firms, including many larger securities and investment banking firms, may have more significant financial resources and research staff than this firm.
8. **Conflicts of Interest** - advisers face inherent conflicts when administering client portfolios and financial reporting. They mitigate these conflicts through comprehensive written supervisory compliance policies and procedures and COE, which provides that the client's interest is always held above that of the firm and its Associates.
9. **Corporate Bond Risk** - corporate bonds are debt securities to borrow money. Issuers pay investors periodic interest and repay the amount borrowed periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest but are priced at a discount from their face values, and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the higher its interest rate risk.
10. **Credit Risk** - credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond-issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.
11. **Currency/Exchange Risk** - overseas investments are subject to fluctuations in the dollar's value against the investment's originating country's currency.
12. **Diversification Risk** - a portfolio may not be widely diversified among sectors, industries, geographic areas, or security types or may not necessarily be diversified among many issuers. These portfolios might be subject to more rapid change

in value than would be the case if the investment vehicles were required to maintain a broad diversification among companies or industry groups.

13. *Equity Investment Risk* - generally refers to buying shares of stocks by an individual or firm in return for receiving a future payment of dividends and capital gains if the stock's value increases. An inherent risk is involved when purchasing a stock that may decrease value; the investment may incur a loss.
14. *Financial Risk* - is the possibility that shareholders will lose money when they invest in a company with debt if its cash flow proves inadequate to meet its financial obligations. When a company uses debt financing, its creditors will be repaid before its shareholders should the company become insolvent. Financial risk also refers to the possibility of a corporation or government defaulting on its bonds, which would cause those bondholders to lose money.
15. *Fixed Income Call Option Risk* - including agency, corporate and municipal bonds and all mortgage-backed securities, contain a provision that allows the issuer to "call" all or part of the issue before the bond's maturity date. The issuer usually retains this right to refinance the bond in the future if market interest rates decline below the coupon rate. There are disadvantages to the call provision: the cash flow pattern of a callable bond is not known with certainty because the issuer will call the bonds when interest rates have dropped. There is exposure to reinvestment rate risk - investors will have to reinvest the proceeds received when the bond is called at lower interest rates. The capital appreciation potential of a bond will be reduced because the price of a callable bond may not rise much above the price at which the issuer may call the bond.
16. *Foreign/Non-U.S. Investments* - From time to time, advisers may invest and trade a portion of client portfolios in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social, and economic developments abroad, as well as risks resulting from the differences between the regulations to which US and foreign issuers and markets are subject. Such risks may include political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, limitations on the use or transfer of portfolio assets, enforcing legal rights in some foreign countries is difficult, costly, and slow, and there are sometimes unique problems enforcing claims against foreign governments, and foreign securities and other assets often trade in currencies other than the US dollar. Advisers may directly hold foreign currencies and purchase and sell foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect an investment's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the US dollar relative to these other currencies may cause the value of an investment to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in the value or liquidity of an investor's foreign currency holdings. If an investor enters forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if an investor enters forward contracts to increase return, it may sustain losses. Non-U.S. securities, commodities, and other markets may be less liquid, more volatile, and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing, and financial reporting standards, and there may be less public information about issuers' operations in such markets.
17. *Hedging Transaction Risk* - investments in financial instruments such as forward contracts, options, commodities and interest rate swaps, caps and floors, other derivatives, and other investment techniques are commonly utilized by investment funds to hedge against fluctuations in the relative values of their portfolio positions because of changes in currency exchange rates, interest rates, and the equity markets or sectors thereof. Any hedging against a decline in portfolio positions' value does not eliminate fluctuations in portfolio positions' values or prevent losses if such positions decline but establishes other positions designed to gain from those same developments, thus moderating the portfolio positions' decline value. Such hedging transactions also limit the opportunity for gain if the portfolio positions' value increases.
18. *Horizon & Longevity Risk* - The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments you were expecting to hold for the long term. You may lose money if you must sell when the markets are down. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for retired people or those nearing retirement.
19. *Inflation & Interest Rate Risk* - Security prices and portfolio returns will likely vary in response to inflation and interest rate changes. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many fixed-income investments to decline.
20. *Lack of Registration Risk* - Funds, private placements, or LP interests have neither been registered under the Securities Act, securities, or "blue sky" laws of any state and, therefore, are subject to transfer restrictions and legislative changes or court rulings may impact the value of investments or the securities' claim on the issuer's assets and finances.

21. *Leverage Risk* - leverage requires the pledging of assets as collateral, and margin calls or changes in margin requirements could result in the need to pledge additional collateral or liquidate account holdings, requiring the account to close positions at substantial losses not otherwise be realized. There can be an increase in the risk of loss and volatility for accounts that use leverage by engaging in short sales, entering swaps and other derivatives contracts, or different leveraging strategies.
22. *Limited Partnerships Risk* - a limited partnership is a financial affiliation with at least one general partner and several limited partners. The partnership invests in a venture, such as real estate development or oil exploration, for financial gain. The general partner runs the business and has management authority and unlimited liability. And, in the event of bankruptcy, it is responsible for all debts not paid or discharged. The limited partners have no management authority, and their liability is limited to the amount of their capital commitment. Profits are divided between general and limited partners according to an arrangement formed at the creation of the partnership. The range of risks depends on the nature of the partnership and is disclosed in the offering documents if privately placed. Publicly traded limited partnerships have similar risk attributes to equities. However, like privately placed limited partnerships, their tax treatment differs from the equities' tax regime. Investors should consult with their tax adviser regarding their tax treatment.
23. *Liquidity Risk* - The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price, or selling the investment may not be possible.
24. *Long-Term Trading Risk* - long-term trading is designed to capture return and risk market rates. Due to its nature, the long-term investment strategy can expose clients to risks that typically surface at multiple intervals when they own 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.
25. *Managed Futures Funds Risk* - a managed futures mutual fund invests in other funds. The underlying funds will typically employ various actively managed futures strategies that will trade various derivative instruments, including (i) options, (ii) futures, (iii) forwards, or (iv) spot contracts, each of which may be tied to (i) commodities, (ii) financial indices and instruments, (iii) foreign currencies, or (iv) equity indices. Managed futures strategies involve substantial risks that differ from traditional mutual funds. Each underlying fund is subject to specific risks, depending on the fund's nature. These risks include liquidity, sector, foreign currency, fixed-income securities, commodities, and other derivatives. Investing in underlying funds could affect the timing, amount, and character of distributions to you and, therefore, increase the amount of taxes you pay. Each underlying fund is subject to investment advisory and other expenses, including potential performance fees. An investor's cost of investing in a managed futures fund will be higher than investing directly in underlying funds and may be higher than other mutual funds that invest directly in stocks and bonds. Investors will indirectly bear fees and expenses charged by the underlying funds and the fund's direct fees and expenses. Each underlying fund will operate independently and pay management and performance-based fees to each manager. The underlying funds will pay various management fees from assets and performance fees of each underlying fund's returns. There could be periods when fees are paid to one or more underlying fund managers even though the fund has lost the period.
26. *Margin Risk* - securities purchased on margin in a client's account are a firm's collateral for a client's loan. If the account securities decline in value, so does the value of the collateral supporting loan, and, as a result, the firm can act by issuing a margin call or selling securities or other assets in any of the accounts the investor may hold with the member, to maintain the required equity in the account. Understanding the risks involved in trading securities on margin is essential. These risks include but are not limited to losing more funds than deposited in the margin account, the firm forcing the sale of securities or other assets in the account(s) or selling securities or other assets without contacting the investor, or the investor not being entitled to choose which securities or other assets in their account(s) can be liquidated or sold to meet a margin call. Further, a firm can increase its "house" maintenance margin requirements without providing an advance written notice, without entitlement to an extension of time on the margin call.
27. *Market Risk* - market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the investment value regardless of the issuer's operational success or financial condition. The price of a security, option, bond, or mutual fund can drop due to tangible and intangible events and situations. External factors cause this risk, independent of a security's underlying circumstances. The adviser cannot guarantee that it will accurately predict market, price, or interest rate movements or risks.
28. *Material Non-Public Information Risk* - because of their responsibilities in connection with other adviser activities, individual advisory Associates may occasionally acquire confidential or material non-public information or be restricted from initiating transactions in specific securities. The adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may be unable to initiate a transaction that it otherwise might have started and may not be able to sell an investment it otherwise might have sold.

29. *Money Market Funds* - a money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, the share price is not guaranteed to stay at \$1/share. You can lose some or all of your principal if the share price decreases. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than expected, you may need more cash. A final risk you are taking with money market funds is inflation. Because money market funds are considered safer than other investments like stocks, long-term average returns on money market funds tend to be less than long-term average returns on riskier investments. Over long periods, inflation can eat away at your returns.
30. *Municipal Securities Risks* - municipal securities, while generally thought of as safe, can have significant risks associated with them, including, but not limited to: the creditworthiness of the governmental entity that issues the bond, the stability of the revenue stream that is used to pay the interest to the bondholders, when the bond is due to mature, and, whether or not the bond can be "called" before maturity. When a bond is called, it may not be possible to replace it with one of equal character paying the same amount of interest or yield to maturity. Municipal securities are backed by either the full faith and credit of the issuer or by revenue generated by a specific project - like a toll road or parking garage for which the securities were issued. The latter type of securities could quickly lose value or become virtually worthless if the expected project revenue does not meet expectations.
31. *Mutual Funds & Exchange Traded Funds* - mutual funds and exchange-traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small-cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock, and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no-load" and charge no fee to buy into, or sell out of, the fund, other mutual funds do charge such fees, which can also reduce returns. Mutual funds can also be "closed-end" or "open-end." So-called "open-end" mutual funds continue to allow in new investors indefinitely, whereas "closed-end" funds have a fixed number of shares to sell, limiting their availability to new investors. ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or another benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks daily, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index but are expected to yield similar performance.
32. *Non-U.S. Investment Risk* - investment in non-U.S. issuers or securities principally traded outside the United States may involve certain unique risks due to economic, political, and legal developments, including but not limited to favorable or unfavorable changes in currency exchange rates, exchange control regulations, expropriation of assets or nationalization, risks relating to political, social and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject and the imposition of withholding taxes on dividend or interest payments.
33. *Options Contracts Risks* - Options are complex securities that involve risks and are not suitable for everyone. Options trading can be speculative and carry a substantial risk of loss. It is generally recommended that you only invest in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (the "expiration date"). The two types of options are calls and puts. A call gives the holder the right to buy an asset at a certain price within a specific period. Calls are similar to having a long position on a stock. Buyers of calls hope the stock will increase substantially before the option expires. A put gives the holder the right to sell an asset at a certain price within a specific period. Puts are very similar to having a short position on a stock. Buyers of puts hope that the stock price will fall before the option expires. Selling options is more complicated and can be even riskier. Option buyers and sellers should be aware of the option trading risks associated with their investment(s).

34. *Political & Legislative Risk* - companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the U.S. or those conducting a substantial amount of their business outside the U.S.
35. *Portfolio Turnover Risk* - an account's investment strategy may require active portfolio trading. As a result, turnover and brokerage commission expenses may significantly exceed those of other investment entities of comparable size.
36. *Private Investment Risk* - investments in private funds, including debt or equity investments in operating and holding companies, investment funds, joint ventures, royalty streams, commodities, physical assets, and other similar types of investments, are highly illiquid and long-term. A portfolio's ability to transfer or dispose of private investments is expected to be highly restricted. The ability to withdraw funds from LP interests is usually restricted following the withdrawal provisions contained in an Offering Memorandum. In addition, substantial withdrawals by investors within a short period could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, possibly reducing the value of the fund's assets or disrupting the fund's investment strategy.
37. *Private Placement Risks* - a private placement (non-public offering) is an illiquid security sold to qualified investors and not publicly traded or registered with the Securities and Exchange Commission. Private placements generally carry a higher degree of risk due to this illiquidity. Most securities acquired in a private placement will be restricted and must be held for an extended time and, therefore, cannot be easily sold. The range of risks depends on the nature of the partnership and is disclosed in the offering documents.
38. *Public Information Accuracy Risk* - an adviser can select investments, in part, based on information and data filed by issuers with various government regulators or other sources. Even if they evaluate all such information and data or seek independent corroboration when it's considered appropriate and reasonably available, the Adviser cannot confirm its completeness, genuineness, or accuracy. In some cases, complete and accurate information is not available.
39. *Real Estate Risks* - real estate is increasingly being used as part of a long-term core strategy due to increased market efficiency and increasing concerns about the future long-term variability of stock and bond returns. Real estate is known for its ability to serve as a portfolio diversifier and inflation hedge. However, the asset class still bears a considerable amount of market risk. Real estate has shown itself to be very cyclical, somewhat mirroring the ups and downs of the overall economy. In addition to employment and demographic changes, real estate is also influenced by changes in interest rates and the credit markets, which affect the demand and supply of capital and, thus, real estate values. Along with changes in market fundamentals, investors wishing to add real estate as part of their core investment portfolios need to look for property concentrations by area or property type. Because property returns are directly affected by local market basics, real estate portfolios that are too heavily concentrated in one area or property type can lose their risk mitigation attributes and bear additional risk by being too influenced by local or sector market changes.
40. *Real Estate Investment Trusts Risk* - a real estate investment trust ("REIT") is a corporate entity that invests in real estate and/or engages in real estate financing. A REIT reduces or eliminates corporate income taxes. REITs can be publicly or privately held. Public REITs may be listed on public stock exchanges. REITs are required to declare 90% of their taxable income as dividends, but they actually pay dividends out of funds from operations, so cash flow has to be strong, or the REIT must either dip into reserves, borrow to pay dividends or distribute them in stock (which causes dilution). After 2012, the IRS stopped permitting stock dividends. Most REITs must refinance or erase large balloon debts periodically. The credit markets are no longer frozen, but banks are demanding and getting harsher terms to re-extend REIT debt. Some REITs may be forced to make secondary stock offerings to repay debt, leading to additional dilution of the stockholders. Fluctuations in the real estate market can affect the REIT's value and dividends. REITs have specific risks, including valuation due to cash flows, dividends paid in stock rather than cash, and debt payment resulting in the dilution of shares.
41. *Recommendation of Particular Types of Securities Risk* - we may advise on other investments as appropriate for each client's customized needs and risk tolerance. Each security type has its unique set of risks, and it would be impossible to list all the specific risks of every investment type here. Even within the same type of investment, risks can vary widely. However, the higher the anticipated investment return, the greater the risk of associated loss.
42. *Reinvestment Risk* is the risk that future investment proceeds must be reinvested at a potentially lower return rate. Reinvestment Risk primarily relates to fixed-income securities.
43. *Reliance on Management & Key Personnel Risk* - occurs when investors have no right or power to participate in a firm's management. Investors must be willing to entrust all management aspects to a company's management and key personnel. The investment performance of individual portfolios depends mainly on the skill of key personnel of a firm and including its sub-advisors, as applicable. If key staff were to leave the firm, the firm might not find equally desirable replacements, and the accounts' performance could be adversely affected.
44. *Securities Futures Contracts* - (on tangibles and intangibles) a futures contract is a standardized, transferable, exchange-traded contract requiring delivery of a commodity, bond, currency, or stock index specified price on a selected specified

price future date. Unlike options the holder may or may not choose to exercise, futures contracts must purchase the underlying asset at a set future date. The holder of a futures contract must have sold it by that date or be prepared to pay for and take delivery of the underlying asset. Material risks can include but are not limited to futures contracts that have a margin requirement that must be settled daily, there is a risk that the market for a particular futures contract may become illiquid, and the market price for a particular commodity or underlying asset might move against the investor requiring that the investor sell futures contracts at a loss.

45. *Short-Sales Risk* - short sales can, in certain circumstances, increase the impact of adverse price movements on the portfolios. A short sale involves the risk of a theoretically unlimited increase in the market price of the particular investment sold short, resulting in an inability to cover the short position and a theoretically unlimited loss. There can be no assurance that securities necessary to cover a short position will be available for purchase.
46. *Small & Medium Cap Company Risk* - securities of companies with small and medium market capitalizations are often more volatile and less liquid than larger companies' investments. Small and medium-cap companies may face a higher risk of business failure, increasing the client's portfolio's volatility. While smaller companies generally have the potential for rapid growth, they often involve higher risks because they may lack the management experience, financial resources, product diversification, and competitive strength of larger companies. In addition, in many instances, trading frequency and volume may be substantially less than is typical of larger companies. As a result, the securities of smaller companies may be subject to broader price fluctuations.
47. *Stocks* - There are numerous ways of measuring the risk of equity securities, also known simply as "equities" or "stock." In very broad terms, the value of a stock depends on the company's financial health issuing it. However, stock prices can be affected by many other factors, including but not limited to the class of stock, such as preferred or common, the health of the issuing company's market sector, and the economy's overall health. In general, larger, better-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap"), but the sheer size of an issuer is not, by itself, an indicator of the safety of the investment.
48. *Stock Funds* - although a stock fund's value can rise and fall quickly (and dramatically) over the short term, stocks have performed better over the long term than other types of investments—including corporate bonds, government bonds, and treasury securities. Overall, "market risk" poses the most significant potential danger for investors in stock funds. Stock prices can fluctuate for various reasons, such as the economy's overall strength of demand for products or services.
49. *Stock Market Risk* - the market value of stocks will fluctuate with market conditions. While stocks have historically outperformed other asset classes over the long term, they tend to fluctuate over the short term because of factors affecting individual companies, industries, or the securities market. The past performance of investments is no guarantee of future results.
50. *Strategy Restrictions Risk* - individual institutions may be restricted from directly utilizing some investment strategies the Adviser may engage. Such institutions, including entities subject to ERISA, should consult their advisors, counsel, and accountants to determine what restrictions apply and whether certain investments are appropriate.
51. *Strategy Risk* - an adviser's investment strategies and techniques may not work as intended.
52. *Structured Products Risk* - a structured product, also known as a market-linked product, is generally a pre-packaged investment strategy based on derivatives, such as a single security, a basket of securities, options, indices, commodities, debt issuances, and/or foreign currencies, and to a lesser extent, swaps. Structured products are usually issued by investment banks or affiliates thereof. They have a fixed maturity and have two components: a note and a derivative. A derivative component is often an option. The note provides periodic interest payments to the investor at a predetermined rate, and the derivative component provides for the payment at maturity. Some products use the derivative component as a put option written by the investor that gives the buyer of the put option the right to sell the security or securities at a predetermined price to the investor. Other products use the derivative component to provide for a call option written by the investor that gives the buyer the right to buy the security or securities from the investor at a predetermined price. A feature of some structured products is a "principal guarantee" function, which offers protection of the principal if held to maturity. However, these products are not always Federal Deposit Insurance Corporation insured; the issuer may only insure them and thus have the potential for loss of principal in the case of a liquidity crisis or other solvency problems with the issuing company. Investing in structured products involves many risks, including but not limited to fluctuations in the price, level or yield of underlying instruments, interest rates, currency values and credit quality; substantial loss of principal; limits on participation in any appreciation of the underlying instrument; limited liquidity; credit risk of the issuer; conflicts of interest; and, other events that are difficult to predict.
53. *Supervision of Trading Operations Risk* - an adviser, with assistance from its brokerage and clearing firms, intends to supervise, and monitor trading activity in the portfolio accounts to ensure compliance with firm and client objectives. However, despite their efforts, there is a risk of unauthorized or otherwise inappropriate trading activity in portfolio

accounts. Depending on the nature of the investment management service selected by a client and the securities used to implement the investment strategy, clients can be exposed to risks specific to the securities in their respective investment portfolios.

54. *Systematic Risks* - these are risks related to a broad universe of investments. These risks are also known as non-diversifiable risks, as diversification within the system will not reduce risk if the system loses value.
55. *Trading Limitation Risk* - for all securities, instruments, or assets listed on an exchange, including options listed on a public exchange, the exchange has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render specific strategies challenging to complete or continue, subjecting the Adviser to loss. Such a suspension could make it impossible for an adviser to liquidate positions and expose the Adviser to potential losses.
56. *Turnover Risk* - at times, the strategy may have a higher portfolio turnover rate than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect an account's performance.
57. *Undervalued Securities Risk* - identifying investment opportunities in undervalued securities is complex, and there are no assurances that such opportunities will be successfully recognized or acquired. While undervalued securities can sometimes offer above-average capital appreciation opportunities, these investments involve high financial risk and can result in substantial losses. Returns generated may not compensate for the business and financial risks assumed.
58. *Unsystematic Risks* - these are risks uniquely related to a specific investment. Also known as "diversifiable risks," theoretically, diversifying different investments may reduce unsystematic risks significantly.
59. *Warrants* - a warrant is a derivative (security that derives its price from one or more underlying assets) that confers the right, but not the obligation, to buy or sell a security – typically an equity – at a specific price before the expiration. The price at which the underlying security can be bought or sold is the exercise or strike price. Warrants that confer the right to buy a security are called warrants; those that confer the right to sell are known as put warrants. Warrants are in many ways similar to options. The main difference between warrants and options is that warrants are issued and guaranteed by the issuing company, whereas options are traded on an exchange and are not issued by the company. Also, the lifetime of a warrant is often measured in years, while the lifetime of a typical option is measured in months. Warrants do not pay dividends or come with voting rights.
60. *Withdrawal of Capital Risks* - an Offering Memorandum's withdrawal provisions usually restrict the ability to withdraw funds from the funds, private placement, or LP interests. Investors' substantial withdrawals within a short period could require a fund to liquidate securities positions and other investments more rapidly than would otherwise be desirable, reducing the value of the fund's assets and disrupting the fund's investment strategy.

Risks of Specific Securities Utilized

While WWA seeks investment strategies that do not involve significant or unusual risk beyond the general domestic and international equity markets, in some instances, methods that hold a higher risk of capital loss may be utilized. While all investing involves risk, using such strategies is a material risk of loss. Investing also risks missing more favorable returns that could be achieved by investing in alternate securities or commodities. Any of the above investment strategies may lead to a loss of investments, especially if the markets move against the client. Clients are advised that investing in securities involves the risk of losing the entire principal amount invested, including any gains - they should not invest unless they can bear these losses.

WWA does not represent or guarantee that the services provided, or any analysis methods provided can or will predict future results, successfully identify market tops or bottoms, or insulate investors from losses due to market corrections or declines. There is no guarantee of client account future performance or any level of performance, the success of any investment decision or strategy used, overall account management, or that any investment mix or projected or actual performance shown will lead to expected results or perform in any predictable manner. Past performance is not indicative of future results. The investment decisions made for client accounts are subject to various market, currency, economic, political, and business risks (including many above) and will not always be profitable. The outcome(s) described, and any strategies or investments discussed may not be suitable for all investors. Further, there can be no assurance that advisory services will result in any particular result, tax, or legal consequence.

An investment could lose money over short or even long periods. Clients should expect their account value and returns to fluctuate within a wide range, like the overall stock and bond market fluctuations.

Before acting on WWA's analysis, advice, or recommendation, clients should consult with their legal counsel, tax, and other financial investment professionals, as necessary, to aid in due diligence as proper for their situation and decide the suitability of the risk associated with any investment. Clients are encouraged to direct questions regarding risks, fees, and costs to their applicable Advisor Representative.

Item 9: Disciplinary Information

Registered investment advisers such as WWA are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or prospective client's evaluation of the investment adviser or the integrity of its management. WWA has no disciplinary or legal proceedings to disclose. WWA encourages clients to perform their due diligence on the topic. Visit www.investor.gov for a free and simple search tool to research WWA and its financial professionals.

Item 10: Other Financial Industry Activities & Affiliations

WWA is an independent registered investment adviser. The firm offers no other services except those described herein. It does not have any relationship or arrangement material to our advisory business or our clients regarding any of the following entities:

- broker-dealer, municipal securities dealer, government securities dealer or broker,
- an investment company or other pooled investment vehicle (*including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund*),
- other investment adviser or financial planner,
- futures commission merchant, commodity pool operator, or commodity trading adviser,
- banking or thrift institution,
- accountant or accounting firm,
- lawyer or law firm,
- insurance company or agency,
- pension consultant,
- real estate broker or dealer, and/or
- sponsor or syndicator of limited partnerships.

Other Investment Advisers or Financial Planners

Dimensional Fund Advisors

WWA participates in the institutional customer program offered by Dimensional Fund Advisors ("DFA" or "Dimensional"). DFA primarily manages securities and other assets for institutional investors, high-net-worth individuals and clients of independent financial advisors. Dimensional is an investment adviser providing portfolio management services to several SEC-registered investment companies, representing numerous separate funds in the aggregate, including mutual funds and exchange-traded funds ("U.S. Dimensional Funds"). The firm (formerly Dimensional Fund Advisors Inc.), which has been in business since 1981, also provides industry-related software, research, meetings, and conferences to Advisers such as WWA.

Professional Associations

WWA is a member of The National Association of Personal Financial Advisors ("[NAPFA](#)"), a professional association for fee-only financial advisors. As indicated on its website, neither Members nor Affiliates may receive commissions, rebates, awards, finder's fees, bonuses or other forms of compensation from others due to a client's implementation of the individual's planning recommendations. Fee offset arrangements, 12b-1 fees, insurance rebates or renewals and wrap fee arrangements are transaction-based examples of compensation arrangements that do not meet the NAPFA definition of "fee-only" practice. NAPFA has developed high standards in the field, and compliance with NAPFA standards and industry regulations includes a provision that members:

- must abide by the NAPFA Code of Ethics, Standards of Membership and Affiliation, Bylaws, resolutions adopted by the Board and all rules set forth in the NAPFA Policies and Procedures Manual.
- agree to comply with all federal and state statutes, rules, regulations, administrative and judicial rulings, and other authorities applicable to the provision of financial planning or advisory-related services.
- agree that they will make all appropriate filings, amendments and renewals to required filings with regulatory authorities. This shall include but is not limited to Form ADV. As a condition of NAPFA membership, any and all Form ADV filings may be reviewed by the Membership Task Force.

Each advisor member must also agree to sign and renew a yearly [Fiduciary Oath](#) and subscribe to NAPFA's [Code of Ethics](#).

Other Business Relationships

WWA uses third-party resources to help run its business and provide services to its clients, mostly back-office related. WWA sources these professionals acting in a client's best interest with fiduciary responsibility while focusing on finding the highest value-add providers to service clients. While the Adviser has developed a network of professionals - accountants, lawyers, and otherwise, and the firm may receive gifts of a de minimus nature, such as lunches or dinner, golf, or entertainment, from time to time from referral

sources or de minimus gifts may be given to related professionals who may be potential referral sources, neither WWA nor its Associates receive compensation in return for such use or referrals.

Outside of the relationships indicated herein, neither WWA nor its management persons have any other material relationships or conflicts of interest with other financial industry participants to disclose. *(Please refer to Registered Associate Form ADV 2B Brochure Supplements for details on any approved, outside business activities.)*

Item 11: Code of Ethics, Participation, or Interest in Client Transactions & Personal Trading

Description of Our Code of Ethics

WWA strives to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for Associate professional standards of conduct. We always strive to protect our client's interests and demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. WWA's goal is to be seen as a standard-bearer for "fiduciary responsibility" within our industry.

While no set of rules can anticipate or relieve all potential conflicts of interest, the firm and all Associates have adopted the following eight principles to guide our advisory activities:

1. *Objectivity* - to strive to be as unbiased as possible when providing advice to clients - every situation will be examined without prejudice or personal agenda.
2. *Confidentiality* - to value and maintain client privacy unless release is authorized by the client or as required by law.
3. *Competence* - to maintain a high level of knowledge and professional competence. WWA and its associated Advisor Representatives will only provide advice in areas in which they have knowledge and capability.
4. *Fairness & Suitability* - all dealings and client recommendations will be in the client's best interests. Care is to be exercised before making any product recommendations.
5. *Integrity & Honesty* - endeavor to avoid misunderstandings in regular interpersonal communications. The firm's policy is to keep interactions with clients and other professionals at a level whereby there is no doubt or misinterpreting of intentions.
6. *Regulatory Compliance* - to strive to maintain conformity with legal regulations.
7. *Full Disclosure* - to fully describe methods of compensation and actual or potential conflicts of interest before a client engages our services or as soon as they become known.
8. *Professionalism* - to behave and conduct oneself in a manner that is always a credit to WWA.

All firm Associates are expected to adhere strictly to these guidelines, always. Persons associated with our firm are also required to report any violations of our Code to the CCO.

Participation or Interest in Client Transactions

Neither WWA nor any persons associated with our firm have any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

Personal Trading Practices

WWA's managers, members, officers, and Associates may invest personally in, hold, buy, or sell positions in securities of the same classes purchased for clients or own securities of issuers whose securities are subsequently purchased for clients. Our policy is that no person employed by WWA may buy or sell any security before a transaction is implemented for an advisory account, thus preventing such employees from benefiting from transactions placed on behalf of advisory accounts. The rule does not apply to mutual fund transactions since mutual fund trades will execute at the closing price at the end of the trading day. WWA and its managers, members, officers, and Associates may also buy or sell specific securities for their accounts based on personal investment considerations, which are not deemed appropriate to buy or sell for clients.

Aggregated Trading

WWA or persons associated with our firm may buy or sell securities for you while we or persons associated with our firm buy or sell such securities for our own account(s). We may also combine our orders to purchase securities with your orders to purchase securities ("aggregated trading"). A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities. *(See Item 12: Brokerage Practices for more information on these practices.)*

Neither WWA nor any persons associated with our firm have any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

Conflicts of Interest

WWA's policy prohibits the firm, its Associates, and any related person from participating in trading that may be detrimental to any advisory client or in conflict with the Adviser's written supervisory compliance policies and procedures, Code of Ethics, or any applicable rules of state and federal securities laws, including prohibitions on personal and insider trading. Associates are required to disclose, pre-clear, and report specific trades and maintain compliance with the firm's policies and procedures, including maintaining transaction records, to safeguard that no Associate receives preferential treatment over advisory clients or affects the markets. WWA performs an Access Person trade review quarterly, annually, and as needed to verify Associate compliance with the firm's trading policies and procedures and confirm that no conflicts have occurred. Questions regarding the firm's written supervisory policies and procedures or Code may be addressed directly with WWA's Chief Compliance Officer. Additional details of how WWA mitigates conflicts of interest can be found in the firm's comprehensive written compliance supervisory policies and procedures and Code of Ethics. WWA's Code is available for review free of charge upon request to any client or prospective client by contacting us at 812-379-1120.

Item 12: Brokerage Practices

Preferred Custodians & Brokers-Dealers

WWA does not maintain custody of the assets we manage on your behalf. Client assets must be held in an account at a "qualified custodian," generally a broker-dealer or bank. WWA recommends the brokerage and custodial services of T.D. Ameritrade (our "preferred custodian"). WWA also uses the services of Automatic Data Processing ("ADP") for certain client retirement accounts. WWA is independently owned and operated and not affiliated with TD Ameritrade or ADP.

WWA's preferred custodian will hold our client's assets in a brokerage account and buy and sell securities upon our instructions, as indicated within each client's written Agreement and the documents they execute to establish their custodial account. Clients will enter into an account agreement directly with their chosen custodian; WWA does not open custodial accounts on their behalf.

In recognition of the value of the custodian's services, clients may pay higher commissions and/or trading costs than those available elsewhere. Our selection of custodians is based on many factors, including the level of services provided, the custodian's financial stability, and the cost of services offered to our clients, including the yield on cash sweep choices, commissions, custody fees, and other costs fees or expenses. We seek to recommend a custodian/broker that will hold client assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services.

WWA reviews broker selection annually at a minimum and, in making its preferred custodian selection, will consider various factors, including but not limited to:

- the capability to buy and sell securities for your account itself or to facilitate such services,
- the likelihood that your trades will be executed,
- the availability of investment research and tools,
- the overall quality of services,
- price competitiveness,
- reputation, financial strength, stability, and
- the existing relationship with our firm and our other clients.

Research & Other Soft Dollar Benefits

WWA does not have any soft dollar arrangements.

Economic Benefits

Registered investment advisers have access to the institutional platform of their account custodians. And access to the research products and services from their account custodian and/or other brokerage firms. These products may include financial publications, information about companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm to perform our investment decision-making responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms and are not considered to be paid for with soft dollars. However, clients should be aware that the commissions a particular broker charges for a specific transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

TD Ameritrade Institutional – Preferred Custodian Specific Economic Benefits

We participate in the Institutional Adviser Program (the "Program") TD Ameritrade Institutional offers. TD Ameritrade Institutional is a division of TD Ameritrade Inc. ("TD Ameritrade"), member of FINRA/SIPC, an unaffiliated SEC-registered broker-dealer. TD Ameritrade offers independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the Program.

As disclosed above, we participate in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between our participation in the Program and the investment advice we give you, although we receive economic benefits through our participation in the Program that is typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research-related products and tools; consulting services; access to a trading desk serving our participants; access to aggregated trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to your accounts); the ability to have advisory fees deducted directly from your accounts; access to an electronic communications network for order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third-party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons.

Some of the products and services made available by TD Ameritrade through the Program may benefit us but may not benefit your accounts. These products or services may assist us in managing and administering your accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits our personnel or we receive through participation in the Program do not depend on the number of brokerage transactions directed to TD Ameritrade.

As part of our fiduciary duties, we constantly endeavor to put our client's interests first. Clients should be aware, however, that receiving economic benefits from our related persons in and of itself or us creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

Brokerage for Client Referrals

WVA does not receive client referrals from broker-dealers for cash or other compensation, such as brokerage services or research.

Directed Brokerage

WVA routinely requires that clients direct our firm to execute transactions through T.D. Ameritrade. As such, we may be unable to achieve the most favorable execution of client transactions, and clients may pay higher brokerage commissions than they might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Aggregated Trades

WVA will combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "aggregated trading"). We will then distribute a portion of the shares to participating accounts fairly and equitably. Generally, participating accounts will pay a fixed transaction cost regardless of the number of shares transacted. In some instances, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. If an order is only partially filled, the shares will be allocated to participating accounts fairly and equitably, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in aggregated trading with your accounts; however, they will not be given preferential treatment.

We do not aggregate trades for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If clients enter non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you, and you may pay higher commissions, fees, or transaction costs than clients who enter into discretionary arrangements with our firm.

Trade Errors

If a trading error occurs in your account, our policy is to restore our client's account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Item 13: Review of Accounts

Financial Planning Services

The client's Advisor Representative will review financial plans as needed. Additional reviews will be conducted upon client request. We recommend clients contact us for reviews, at a minimum, based on changes in their circumstances. Changed circumstances may include, but are not limited to, marriage, divorce, birth, death, inheritance, lawsuit, retirement, job loss or disability, among others. We recommend meeting with clients more frequently as they approach a job transition or retirement to review and update their plans if needed. Written updates to the financial plan may be provided in conjunction with the review. Updates to a financial plan may be subject to our then-current hourly rate, which the client must approve in writing in advance of the update. Clients implementing financial planning advice will receive trade confirmations and monthly or quarterly statements from their relevant custodians.

Ongoing Financial Planning & Portfolio Management Services

WWA will monitor ongoing financial planning and portfolio management service client accounts periodically and at least annually to ensure the advisory services are consistent with investment needs and objectives. Such a review and report include addressing the following questions:

- How did the portfolio perform on a nominal and relative basis over the last period?
- Did the portfolio meet its benchmark?
- Did the portfolio meet its objective?
- What parts of the portfolio did well? Poorly?
- As updated, is the current portfolio allocation aligned with the target allocation outlined in the Investment Policy Statement? If not, what changes are needed?
- Does the target portfolio continue to make sense? Has a change in personal circumstances or the broader world occurred that suggests a need to change the target allocation?
- Have any investments in the portfolio performed poorly over a reasonable time, or has some other change occurred to suggest an investment change be made at this time?

Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market-moving events,
- security-specific events, and
- changes in your risk/return objectives.

Accounts may also be reviewed upon other triggering events such as:

- receipt of new money to be invested,
- the request to liquidate and disburse a significant portion of the portfolio,
- a substantial change in the financial circumstances of the client, and
- a significant difference in the status of the financial markets.

Jalene Hahn, WWA's Owner, Chief Compliance Officer and CCO, provides the final review of all such reports and recommendations. Other Associates may prepare some or all the analyses and/or recommendations under her direction or other advisors with primary responsibility for the respective client relationship.

Client communications will occur at several levels:

- market commentaries, articles and newsletters on investment and financial planning topics may be provided to all clients throughout the year,
- client meetings will generally be held annually to review the client's account and the appropriateness of its holdings, and
- meetings, telephone calls, emails, and letters will also provide information from time to time as circumstances warrant.

Outside of any reports required under Rule 206(4)-2 of the Adviser's Act, WWA does not provide client's regular written reports. Clients will receive these items directly from their qualified custodians.

Custodial Account Statements

At the time of account inception, clients will direct their custodian to send them statements at least quarterly, (1) reflecting all account transactions that occurred during the previous reporting period, the funds, securities, and other property in the account at the end of the period, and (2) provide WWA duplicate copies of all periodic statements and other reports for the account the custodian sends to the client.

The client's custodians will then provide quarterly account statements describing all activity in the account during the preceding quarter, including holdings, account transactions, contributions, withdrawals, fees and expenses, and the account value at the period beginning and ending. Statements may also include performance, other pertinent, appropriate information, and documents necessary for tax preparation. Clients may also receive trade confirmation documents for all transactions by their custodians for each buy or sell transaction within their account. Client statements will be sent to the address provided by the client to the Adviser or such other address to which the client may request in writing they be sent.

WWA urges clients to promptly review any statements they receive directly from their custodian upon receipt to ensure account transaction accuracy. Clients should also compare their account(s) ' investment performance against the appropriate blended benchmark as applicable to the type of investments held in the account and any periodic report or information received from us. The information obtained from WWA may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodology of particular securities.

WWA encourages clients to raise any questions with us about the custody, safety, or security of their assets or any statements received. If a client believes there are any inaccuracies or discrepancies in any reports received, or if they do not understand the information reflected in any document received, they should promptly, and in all cases before the next statement cycle, report their concerns to WWA. Unless the client indicates otherwise, by promptly notifying us in writing of concerns regarding statements received or specific investment restrictions on the account(s), investments made in line with the client's stated investment objectives WWA recommends or makes on behalf of a client shall be deemed to conform with the client's investment objectives.

Item 14: Client Referrals & Other Compensation

WWA does not compensate any individual or firm for client referrals or receive any compensation from any third party to provide investment advice to you. (See Item 12: Brokerage Practices for disclosures on research and other benefits we may receive from our relationship with your account custodian.)

Item 15: Custody

WWA does not have physical custody of client funds or securities other than the standard business practice of deducting management fees from client accounts. The adviser prohibits the firm or its Associates from obtaining, accepting, or maintaining custody of client funds, securities, or assets in any manner. Clients will keep all account cash, securities and other assets with a qualified custodian governed by a separate written brokerage and custodial account agreement between the qualified custodian and client. Account checks, funds, wire transfers, and securities will be delivered between the client and the custodian of the record. WWA is not authorized to withdraw any money, securities, or other property from any client custodial account, in the client's name or otherwise.

The independent custodian will directly debit the client's account(s) to pay WWA's advisory fees. To authorize this, the client will provide written limited authorization instructions directly to their custodian and request the custodian provide a "transfer of funds" notice to them at their address of record after each advisory fee payment transfer occurs. The client will provide these instructions on the qualified custodian's form or separately.

The ability to deduct advisory fees from client accounts causes our firm to exercise limited custody over client funds or securities. Clients will receive account statements from the qualified custodian(s) holding their funds and securities at least quarterly to their e-mail or postal mailing address of record, which the client provided to the custodian. And will receive at least quarterly reports from their custodian reflecting all disbursements for the account, including the amounts of any assessed advisory fees. The account statements from the custodian(s) will indicate the amount of our advisory fees deducted from their account(s) each billing period. Clients should review statements provided by their custodian promptly upon receipt.

WWA urges clients to compare the statements they receive directly from their custodian with the information outlined in any reports or periodic portfolio statements received from the adviser to ensure the accuracy of all account transactions.

Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of particular securities. WWA encourages our clients to promptly raise any questions with us about the custody, safety, or security of

their assets. Clients should carefully review account statements for accuracy. We will also provide statements to clients reflecting the amount of the advisory fee deducted from their accounts. Clients should compare our statements with their account custodian(s) statements to reconcile the information reflected on each report.

If you have a question regarding your account statement or did not receive a statement from your custodian, please contact us immediately at 812.379.1120.

Wire Transfers, Check-Writing Authority & Standing Letters of Authorization

WWA or persons associated with our firm may affect wire transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, or we may have signatory and check-writing authority for client accounts if the client has provided us with written authorization to do so. Such written authorization is known as a "standing letter of authorization" (or "SLOA"). An adviser with authority to conduct third-party wire transfers or sign checks on a client's behalf has access to the client's assets and therefore has custody of the client's assets in any related accounts. However, WWA is not required to obtain a surprise annual audit, as otherwise would be necessary by reason of having custody, as long as we meet the following criteria:

1. the client provides a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian,
2. the client authorizes us in writing to direct transfers to the third party either on a specified schedule or from time to time,
3. the qualified custodian verifies the client's authorization (e.g., signature review) and promptly provides a funds transfer notice to the client after each transfer,
4. the client can terminate or change the instruction,
5. WWA has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party,
6. we maintain records showing that the third party is not a related party to us or located at the same address, and
7. the client's qualified custodian sends them, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

Item 16: Investment Discretion

Account Management Style

WWA advisory services are offered either on a discretionary or non-discretionary basis. Details of the relationship are disclosed fully before any advisory relationship commences, and complete information for account management style is reflected in each client's executed Agreement.

Discretionary Authority

Under discretionary account management authority, WWA will execute securities transactions for clients without obtaining specific client consent before each transaction. Discretionary authority includes the ability to do the following without contacting the client:

- determine the security to buy or sell,
- determine the amount of security to buy or sell, and
- determine the timing of when to buy or sell.

In their Agreement, clients will provide discretionary management style authority via written authorization granting WWA full and exclusive discretion to manage all investments, reinvestments, and other transactions for their account as WWA deems appropriate in furtherance of their Investment Risk Profile and IPS, with such changes as the client and their Advisor Representative may agree to from time to time (collectively, the "Investment Guidelines"). Discretionary authority is limited to investments within a client's managed accounts, and clients may impose restrictions on investing in particular securities or types of securities. Clients may limit this authority by giving written instructions. They may also amend/change such limitations by providing written instructions. Clients will sign a "Limited Power of Attorney" as a stand-alone document or as part of the account opening paperwork through their custodian, and WWA will only be required to maintain or solicit clients' consent for trades made on positions explicitly discussed during the introductory interview, such as inherited stock that the client would like to hold on to for sentimental reasons or as otherwise specified. The discretionary authority will remain in full force and effect, notwithstanding the incompetence or disability of the client, until terminated in a written notice to the Adviser.

Non-Discretionary Authority

Non-discretionary account management authority requires clients to initiate or pre-approve investment transactions in their accounts before they occur. Clients may decide not to invest in securities or types of securities and may refuse to approve securities transactions. Under this management style, WWA will recommend and direct the investment and reinvestment of securities, cash, and financial instruments held in the client's accounts as deemed appropriate in furtherance of the client's Investment Risk Profile and IPS, with such changes as the client and their Advisor Representative may agree to from time to time (collectively, the "Investment Guidelines").

Clients will execute all documents WWA, or the custodian requires to establish the account and trading authorization. The non-discretionary authority will remain in full force and effect, notwithstanding the incompetence or disability of the client, until terminated in a written notice to the Adviser.

For both account management styles, if clients object to any investment decision, a mutually agreed-upon decision will be made and documented if necessary. It is always preferred that the client and WWA engage in discussions to resolve any potential opinion differences. However, if the client repeatedly acts inconsistent with the jointly agreed upon investment objectives, WWA reserves the right to cancel the client's Agreement after providing written notice. Similarly, the client reserves the right to cancel their Agreement with the Adviser at any time according to the Agreement provisions if they so desire.

Item 17: Voting Client Securities

Proxy Voting

WWA will not ask for or accept voting authority for client securities. Clients will receive proxy material directly from the security issuer or custodian and are responsible for exercising their right to vote proxies. For accounts subject to the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary holds plan account proxy voting authority and responsibility. Proxy voting for plans governed by ERISA must conform to the plan document. If the investment manager is listed as the fiduciary responsible for voting proxies, the obligation will be designated to another fiduciary and reflected in the plan document.

While WWA may assist a client with their proxy questions, it shall not be deemed to have proxy voting authority solely because of providing client information about a particular proxy vote in the above situations; it is the client's responsibility to vote their proxy. Clients should contact the security issuer before making their final proxy voting decisions.

Class Action Suits, Claims, Bankruptcies & Other Legal Actions & Proceedings

A class action is a procedural device used in litigation to determine the rights of and remedies for large numbers of people whose cases involve common questions of law and fact. Class action suits often arise against companies that publicly issue securities, including those recommended by investment advisors to clients. The client is responsible for class action suits, claims, bankruptcies, and other legal actions/proceedings involving securities purchased or held in their account. WWA will not advise or act for the client in these types of legal proceedings involving securities held or previously held by the account or the issuers of these securities.

WWA does not provide legal advice or engage in any activity that might be deemed to constitute the practice of law or accountancy and is not obligated to forward copies of class action notices received to clients or their agents.

Item 18: Financial Information

Balance Sheet

WWA does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance, and therefore does not need to include a balance sheet with this Brochure.

Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither the Adviser nor its management has any financial conditions that will likely impair its ability to meet contractual commitments to investors. WWA has no additional financial circumstances to report.

Bankruptcy Petitions in the Previous Ten Years

WWA has not been the subject of a bankruptcy petition.

Item 19: Requirements for State-Registered Advisers

Refer to Part(s) 2B for background information about our principal executive officers, management personnel and those giving advice on behalf of our firm. Neither our firm nor any persons associated with our firm are compensated for advisory services with performance-based fees, have any reportable arbitration claims, civil, self-regulatory organization proceedings, or administrative proceedings or have a material relationship or arrangement with any issuer of securities.

Item 20: Additional Information

Business Continuity Plan

Securities industry regulations require that investment advisers inform their clients of their plans to address the possibility of significant business disruption ("SBD") from unexpected events such as power outages, natural disasters, or other such occurrence. Firms must be able to provide continuous and uninterrupted services to their clients, and critical systems must function during such incidents so that the firm can resume operations as quickly as possible, given the SBD's scope and severity. In addition, they must meet their obligations to clients, counterparties, and others during any emergency or SBD.

Since the timing and impact of disasters and disruptions are unpredictable, firms must be flexible in acting. Well thought out, advanced preparations and effective procedures can significantly minimize downtime in the face of a disaster or outage. To satisfy this requirement, WWA has developed a comprehensive Business Continuity Plan ("BCP" or "Plan") to detail how it will react when faced with such conditions. While no contingency plan can eliminate all service interruption risks, WWA's BCP strives to set forth the firm's policies and practices under various SBD situations and mitigate all credible threats while keeping up with changes to the Adviser's business, structure, operations, and location.

WWA's guiding principle is that protecting clients, employees, and family members always takes precedence over preserving business assets. Accordingly, WWA's policy is to respond to an SBD by first safeguarding the lives of its clients, employees, family members, and others, and then firm property, making a quick financial and operational assessment, protecting and preserving all advisory books and records, and promptly recovering and resuming operations to allow clients to continue to transact business as rapidly as possible.

Recovery times may vary depending on the nature and severity of the disruption; however, the objective of restoring mission-critical operations is 0-72 hours.

WWA does not maintain custody of client funds or securities; clients maintain all account assets at an independent qualified custodian with whom they can always communicate and access assets directly, with or without the Adviser's intervention. In the event of an SBD, WWA will help facilitate client access to these external accounts by resolving their questions, providing status updates, and offering up-to-date contact information to assist them in reaching their custodians. If a client's custodian is also impacted by an SBD or cannot be reached, WWA will generate a bulk email via the firm's then-current Internet-based communications platform to inform the situation and safeguard clients' awareness of developments. WWA will also relay communications to custodians on the client's behalf.

BCP Summary

WWA's BCP - reviewed, tested regularly, and updated no less than annually, anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the firm's ability to communicate and do business, such as a fire in the building. External SBDs prevent the operation of the securities markets for several firms and may include terrorist attacks, floods, or wide-scale regional disruptions.

WWA's Plan addresses all mission-critical systems, office closing and relocation procedures, and employee alternative physical locations. In addition, regulatory reporting and alternate communications between the Adviser and its clients, employees, critical business constituents, banks, counterparties, regulators, and others are detailed to preserve uninterrupted communication. The Plan also defines data backup and recovery procedures (hard copy and electronic) and succession planning in the event of key personnel absence. Further, WWA requires its primary internal and external vendor systems providers to periodically verify and test their backup capabilities to promptly provide the necessary information and applications to continue or resume business in an emergency or SBD situation.

WWA carries out its BCP under the direction of the Disaster Recovery Executive Coordinator ("DREC"), Jalene Hahn, its Owner, Chief Compliance Officer and Lead Advisor. The DREC is responsible for making an immediate preliminary assessment of the nature and extent of any disruption and communicating the firm's BCP to employees, clients, critical business constituents, and regulators. When an internal or external event, either minor or significant, occurs or appears to be developing, WWA's DREC will be notified. Upon notification or becoming aware of an SBD event, the DREC will implement BCP emergency procedures, secure the headquarters as

much as possible, and advise all employees to call the firm's emergency call line directly at 812-379-1120. WWA will transfer its operations to a local worksite if a business disruption affects only WWA or a specific area within the firm. If a disruption affects the firm's business district, city, or region, operations will be transferred to an alternate worksite outside the affected area. Telephone service will continue, and regular work processes will resume at its alternate location(s). WWA will continue conducting business in either situation and notify its clients on maintaining contact through a message recorded on its main phone number and website posting.

If an SBD is so severe that it prevents the firm from conducting advisory business, WWA will promptly update its voice message and website. If it is determined that the firm cannot continue its advisory business, clients will be assured swift access to their funds, securities, and any prepaid fees, by direct contact with their respective custodians.

WWA's BCP is designed to allow the firm to continue to provide the quality service its clients have come to expect. Please contact us with any questions about the firm's practices or request a complete copy of our Plan.

Information Security Program

WWA maintains an Information Security Program to reduce the risk of clients' personal and confidential information breaches. Please contact us directly at 812-379-1120 with any questions regarding the Program.

Privacy Practices

Financial planners and investment advisors, like all providers of personal financial services, are now required by law to inform their clients of their policies regarding the privacy of client information. We have been, and continue to be, bound by professional standards of confidentiality that are at least as stringent as those required by law. Before we were required to, we protected our client's right to privacy. WWA is committed to maintaining the confidentiality, integrity and security of the personal information entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, your health to the extent that it is needed for the financial planning process, transactions between you and third parties, and information to help you meet your needs and personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, insurance agents and mortgage lenders with whom you have established a relationship. You may opt out of our sharing information with these unaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person.

With your permission, we share a limited amount of information about you with your investment advisor(s) or brokerage firm(s). We maintain a secure office to ensure your information is not at unreasonable risk.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors. Federal and state securities regulators may review our firm and your personal records as permitted by law. Personally identifiable information about you will be maintained while you are a client and for the crucial period as required by federal and state securities laws. After that time, data may be destroyed.

We will notify you if our privacy policy is expected to change.



WWA Planning & Investments
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Columbus IN 47201
Phone: (812) 379-1120
EMAIL: ADVISOR@WWAFP.COM

PRIVACY POLICY

Financial planners and investment advisors, like all providers of personal financial services, are now required by law to inform their clients of their policies regarding privacy of client information. We have been, and continue to be, bound by professional standards of confidentiality that are at least as stringent as those required by law. So even before we were required to, we have always protected our clients' right to privacy. WWA is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, insurance agents and mortgage lenders with whom you have established a relationship.

You may opt out from our sharing information with these unaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person.

With your permission, we share a limited amount of information about you with your investment advisor(s) or brokerage firm(s). We maintain a secure office to ensure that your information is not placed at unreasonable risk.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter as required by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change.

We are required by law to deliver this Privacy Statement to you annually, in writing.

FINANCIAL ADVICE AS INDIVIDUAL AS YOU ARESM

WWA Planning & Investments is A Registered Investment Advisor

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