

Item 1: Cover Page



Registered As: WCG Wealth Advisors, LLC  
Doing Business As: The Wealth Consulting Group

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April 23, 2025

FORM ADV PART 2A BROCHURE

**NOTICE TO PROSPECTIVE CLIENTS: READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY**

All the material within this Brochure must be reviewed by those who are considering becoming a client of our firm. This Brochure provides information about the qualifications and business practices of WCG Wealth Advisors, LLC doing business as The Wealth Consulting Group. If you have any questions about the contents of this Brochure, please contact us at (702) 263-1919.

In accordance with federal and state regulations, this Brochure is on file with the appropriate securities regulatory authorities as required. The information provided within this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States or by the United States Securities and Exchange Commission ("SEC"). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. WCG Wealth Advisors, LLC is a SEC Registered Investment Adviser. Registration as a Registered Investment Adviser does not imply any level of skill or training. Additional information about WCG Wealth Advisors, LLC also is available on the SEC's Website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Many of the financial advisors of WCG Wealth Advisors, LLC are also Registered Representatives with securities offered through LPL Financial, member FINRA/SIPC. Item 2 Summary of Material Changes.

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to the adviser's disclosure brochure, the Adviser is required to notify you and provide you with a description of the material changes.

## Item 2: Summary of Material Changes

Since our last Brochure dated March 31, 2025, we have had one material change to our Firm Brochure.

1) Item 5” Fees and Compensation” was updated to reflect the amount WCG can charge for ongoing financial advice.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes, as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Disclosure Brochure may be requested by contacting us at (702) 263-1919 or by emailing [compliance@wealthcg.com](mailto:compliance@wealthcg.com).

Additional information about WCG Wealth Advisors, LLC is also available via the SEC’s Website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s Website also provides information about any persons affiliated with WCG Wealth Advisors, LLC who are registered or are required to be registered, as Investment Adviser Representatives of WCG Wealth Advisors, LLC.

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## Item 4: Advisory Business

### Description of Firm

WCG Wealth Advisors, LLC (“WCG”, “Advisor”) d/b/a The Wealth Consulting Group, an SEC Registered Investment Adviser based in Las Vegas, Nevada, was formed in October 2014. WCG has established a network of partner offices that provide advisory services under “doing business as” names in several states throughout the country. A complete list of approved “doing business as” names can be found by searching for WCG Wealth Advisors, LLC (CRD #173194) at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

WCG is an independently owned and operated wealth management company. The 1970 Lee Trust is owned by Jimmy Lee, Trustee. Mr. Lee is also a managing member of WCG.

WCG provides fee-based investment advisory services for compensation primarily to individual clients, high-net-worth individuals, and corporate clients based on the individual goals, objectives, time horizon, and risk tolerance of each client. Portfolio management services include, but are not limited to, the following:

- Investment Strategy
- Asset Allocation
- Risk Tolerance
- Personal Investment Policy
- Asset Selection
- Regular Portfolio Monitoring

WCG’s associated Investment Advisor Representatives (“IARs”) are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a client are dependent upon the representative that is working with the client. Advisors are diligent in evaluating the individual needs of each client when recommending an advisory platform. Investment strategies and recommendations are tailored to the individual needs of each client.

The individuals associated with WCG are appropriately licensed, and authorized to provide advisory services on behalf of WCG. Individuals associated with WCG Wealth Advisors, LLC may also be Registered Representatives of LPL Financial, an SEC registered broker/dealer, a member of the Financial Regulatory Authority (“FINRA”), and the Securities Investors Protection Corporation (“SIPC”). WCG Wealth Advisors, LLC, and LPL Financial are not affiliated legal entities. All material conflicts of interest are disclosed herein.

### Wealth Management

WCG, through its Investment Adviser Representatives, provides ongoing investment advice and management on assets in the client’s custodial Strategic Wealth Management (SWM) account held at LPL Financial. Strategic Wealth Management is the name of the custodial account offered through LPL to support investment advisory services provided by WCG Wealth Advisors, LLC to our clients. Client accounts can also be custodied at Charles Schwab & Co., Inc., and Fidelity Brokerage Services, LLC. WCG but may engage other custodians as necessary and agreed upon with the respective clients utilizing them. Before selecting a custodian, clients should discuss with their advisor the differing custodial accounts, programs, services, fees, and costs. Additionally, the custodians offer various third-party investment manager programs. The final decision to custody assets with any custodian is made by WCG’s clients, including client accounts established under Employee Retirement Income Security Act of 1974, as amended (“ERISA”) or Individual Retirement Account (“IRA”) rules and regulations, in which case the client is acting as either

the plan sponsor or IRA accountholder. For more information about these custodians, clients should refer to Investment Advisor Public Disclosure at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or FINRA BrokerCheck at <https://brokercheck.finra.org/>. More specific account information and acknowledgments are further detailed on the account application.

Investment adviser representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds (“ETFs”), variable annuity subaccounts, real estate investment trusts (“REITs”), equities, and fixed-income securities. Our advice is strategically tailored to guide each individual client toward attaining their personal financial goals and protecting their acquired wealth. Accounts are reviewed on a regular basis and rebalanced as necessary according to each client’s investment strategy.

WCG generally does not have a required minimum account value, but certain programs/WCG portfolio models have required minimums. Please refer to the programs below for the account minimums.

As of December 31, 2024, WCG had only discretionary assets under management of \$5,446,595,206.00.

#### Third-Party Advisory Services.

WCG has entered into agreements with various third-party investment advisers. Under these agreements, WCG can offer clients various types of programs sponsored by these investment advisers. All third-party investment advisers to whom clients may be referred to will be licensed as investment advisers by their resident state and any applicable jurisdictions or registered investment advisers with the Securities and Exchange Commission.

After analyzing a client's financial situation and investment objectives, the IAR will assist the client in selecting a third-party program. Typically, securities transactions will be decided upon and executed by the Third-Party Advisory Service, and that party will exercise discretion in the management of client accounts. Meaning, WCG and its IARs will generally not manage or obtain discretionary authority over the assets. However, these relationships can vary and the client should refer to the executed agreement(s) with all third-party advisors for specific powers, duties, and obligations.

WCG IARs will periodically review reports provided to the client. An IAR will contact the client at least annually, or more often as agreed upon with each client, to review the client’s financial situation and objectives, communicate information to the Third-Party Advisory Service managing the accounts as warranted, and assist the client in understanding and evaluating the services provided by the Third-Party Advisory Service. Clients will be expected to notify IAR of any changes in their financial situation, investment objectives, or account restrictions.

WCG may also provide services to clients referred by a third-party investment advisor. These various services can include billing, and management of clients’ assets.

WCG receives compensation pursuant to its agreements with these third-party advisors for introducing clients to these third-party advisors and for certain ongoing services provided to clients as well as managing and other administrative functions. This compensation is disclosed to the client in a separate disclosure document and is typically equal to a percentage of the investment advisory fee charged by that third-party adviser/Advisor or a fixed fee. The disclosure document provided by WCG will clearly state the fees payable to WCG and the impact on the overall fees due to these payments.

Since the compensation the Investment Adviser Representative of WCG receives may differ depending on the agreement with each third-party investment adviser, the IAR may have an incentive to recommend one third-party advisor over another if the compensation arrangements are more favorable. Since the independent third-party adviser may pay the fee for the investment advisory services of WCG, the fee paid to the Advisor is not negotiable, under most circumstances.

Fees paid by clients to independent third parties are established and payable in accordance with Form ADV 2A or other equivalent disclosure documents of each independent third-party adviser to whom the Advisor refers its clients, and may or may not be negotiable, as disclosed in the disclosure documents of the third-party adviser.

Clients who are referred to third-party investment advisers/Advisor will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant third-party adviser's Form ADV 2A or equivalent disclosure document at the same time as the Form ADV 2A or equivalent disclosure document of WCG.

In addition, if the investment program recommended to a client is a wrap fee program, the client will also receive the wrap fee brochure provided by the sponsor of the program. WCG or its Investment Adviser Representative will provide each client with all appropriate disclosure statements, including disclosure of solicitation fees to the Advisor and its advisory associates.

#### LPL Sponsored Advisory Programs Optimum

##### Market Portfolios Program (OMP)

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, the client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. The IAR will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. Advisor will have the discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. LPL will have the discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have the authority to rebalance the account.

A minimum account value of \$1,000 is generally required for OMP (note that accounts below \$10,000 are required to have systematic contributions in place).

##### Personal Wealth Portfolios Program (PWP)

Our PWP Program offers clients an asset management account using asset allocation model portfolios designed by LPL. Your Advisor will have discretion in selecting the asset allocation model portfolio based on the client's investment objective. Advisor will also have discretion for selecting third-party money managers (PWP Advisors) or mutual funds within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds and equity and fixed-income securities.

A minimum account value of \$250,000 is required for PWP.

##### Model Wealth Portfolios Program (MWP)

Our MWP Program offers clients a professionally managed mutual fund asset allocation program. WCG Wealth

Advisors, LLC and its Investment Adviser Representatives will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. The IAR will initiate the steps necessary to open an MWP account and have the discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL's Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange-traded funds) and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts.

The MWP Program also offers diverse model portfolios designed by outside strategists, other than LPL's Research Department. Our clients, with the guidance of their IAR, can choose from strategists such as BlackRock, J.P. Morgan Asset Management, Quantitative Advantage, Cougar Global Investments, AlphaSimplex Group, and others under this platform.

Minimum account values vary based on manager and model, starting at \$10,000.

#### Guided Wealth Portfolios (GWP)

Our GWP Program offers clients the ability to participate in a centrally managed, algorithm-based investment program, which is made available to users and clients through a web-based, interactive account management portal ("Investor Portal"). Investment recommendations to buy and sell open-end mutual funds and exchange-traded funds are generated through proprietary, automated, computer algorithms (collectively, the "Algorithm") of Xulu, Inc., doing business as "FutureAdvisor" based upon model portfolios constructed by LPL and selected for the account as described below (such model portfolio selected for the account, the "Model Portfolio"). Communications concerning GWP are intended to occur primarily through electronic means (including but not limited to, email communications or through the Investor Portal), although your IAR will be available to discuss investment strategies, objectives, or the account in general in person or via telephone.

A preview of the Program (the "Educational Tool") is provided for a period of up to forty-five (45) days to help users determine whether they would like to become advisory clients and receive ongoing financial advice from LPL, FutureAdvisor and Wealth Consulting Group by enrolling in the advisory service (the "Managed Service"). The Educational Tool and Managed Service are described in more detail in the GWP Program Brochure. Users of the Educational Tool are not considered to be advisory clients of LPL, FutureAdvisor, or Wealth Consulting Group, do not enter into an advisory agreement with LPL, FutureAdvisor, or Wealth Consulting Group, do not receive ongoing investment advice or supervision of their assets, and do not receive any trading services,

#### Features of the Educational Tool

Users of the Educational Tool (each user) agree to terms of use ("Terms of Use") and complete an investor profile. An investment objective ("Investment Objective") and Model Portfolio are assigned to each user based upon factors in the investor profile, including risk tolerance and the number of years remaining until the age of retirement (such time being referred to herein as the "Retirement Age"). (See the description in "Features of the Managed Service" below for information regarding the design of the Model Portfolios.) Based on the Investment Objective and Model Portfolio, the Educational Tool generates sample analysis, advice, and investment recommendations ("Sample Recommendations").

The Educational Tool provides Sample Recommendations that can assist users in determining whether to utilize the Managed Service. Access to the Educational Tool is generally limited to a period of forty-five (45) days. The Educational Tool is intended to be used for educational and informational purposes only. The Educational Tool does not provide comprehensive financial planning and is not intended to constitute legal, financial, or tax advice. There can be other relevant factors and financial considerations (e.g., debt load or financial obligations) that LPL, FutureAdvisor, and our IARs do not take into consideration in formulating any Sample Recommendations provided. The Sample Recommendations made are meant solely as a sample of the types of recommendations available through the Managed Service. LPL, FutureAdvisor, and Registrant are not responsible for any actions taken with respect to the Sample Recommendations, and users are solely responsible for making their own investment decisions. The Educational Tool is only one of many tools that users can use as part of a comprehensive investment analysis process. Users should not rely on the Educational Tool as the sole basis for investment decisions.

Although LPL is an investment adviser and broker-dealer registered with the SEC and a member of FINRA, and FutureAdvisor is an investment adviser registered with the SEC, in providing access to the Educational Tool, LPL, FutureAdvisor, and Advisor do not intend to establish an advisory relationship, or in the case of LPL, a brokerage relationship, with users of the Educational Tool. Users are not charged an advisory fee or any other fee or expense to use the Educational Tool. The scope of any investment advisory relationship with LPL, FutureAdvisor, and Registrant begins when users enroll in the Managed Service. The output that users receive by using the Educational Tool, including the Sample Recommendations, can differ materially from the advice users would receive as an advisory client of LPL, FutureAdvisor, and/or Registrant.

None of LPL, FutureAdvisor, or Registrant provides ongoing investment management or trading services for assets of users of the Educational Tool, makes any determination as to whether the website through which the GWP program ("Program") is accessed or the Educational Tool is appropriate for any user, can access any assets in any accounts users aggregate in the Educational Tool, places any trades on behalf of users of the Educational Tool, or provides ongoing supervision of assets of users of the Educational Tool. The Sample Recommendations provided are intended as an informational preview of the Managed Service, and the Sample Recommendations are being provided to demonstrate the types of analysis, advice, and recommendations provided by the Managed Service.

#### Features of the Managed Service

Investors participating in the Managed Service complete an account application (the "Account Application") and enter into an account agreement (the "Account Agreement") with LPL, Registrant, and FutureAdvisor. As part of the account opening process, such clients are responsible for providing complete and accurate information regarding, among other things, their age, risk tolerance, and investment horizon (collectively, "Client Profile"). LPL, the IAR, and FutureAdvisor rely on the information in the Client Profile in order to provide services under the Program, including but not limited to, the determination of the suitability of the Program for clients and an appropriate Investment Objective and Model Portfolio for clients. The Model Portfolios have been designed and are maintained by LPL or, in the future, a third-party investment strategist (as applicable, the "Portfolio Strategist") and shall include a list of securities holdings, relative weightings, and a list of potential replacement securities for tax harvesting purposes. FutureAdvisor, Registrant, IARs, and participating clients cannot access, change or customize the Model Portfolios. Only one Model Portfolio is permitted per account.

Based upon a participating client's risk tolerance as indicated in the Client Profile, the client is assigned an investment allocation track (currently, allocation track options include Fixed Income Tilt, Balance Tilt, or Equity Tilt), the purpose of which is to slowly rotate the client's equity allocation to fixed income over time. LPL's Research



The department created these tracks using academic research on optimal retirement allocations, the industry averages as calculated by Morningstar for the target date fund universe, and input from FutureAdvisor.

Within the applicable allocation track and based upon a participating client's chosen Retirement Age in the Client Profile, such client will be assigned a Model Portfolio and one of five of LPL's standard investment objectives (described below):

- Income with capital preservation. Designed as a longer-term accumulation account, this investment objective is considered generally the most conservative. Emphasis is placed on the generation of current income with minimal risk of capital loss. Lowering the risk generally means lowering the potential income and overall return.
- Income with moderate growth. This investment objective emphasizes the generation of current income with a secondary focus on moderate capital growth.
- Growth with income. This investment objective emphasizes modest capital growth with some focus on the generation of current income.
- Growth. This investment objective emphasizes achieving high long-term growth and capital appreciation. There is little focus on the generation of current income.
- Aggressive growth. This investment objective emphasizes aggressive growth and maximum capital appreciation, with no focus on the generation of current income. This objective has a very high level of risk and is for investors with a longer time horizon.

Both the participating client and our IARs are required to review and approve the initial Investment Objective. As such a client approaches the Retirement Age, the Algorithm will automatically adjust the client's asset allocation. Any change to the Investment Objective directed by a client due to changes in the client's risk tolerance and/or Retirement Age will require written approval from the client and our IAR before implementation. Failure to approve the change in Investment Objective can result in a client remaining in a Model Portfolio that is no longer aligned with the applicable Client Profile. The Investment Objective selected for the account is an overall objective for the entire account and can be inconsistent with a particular holding and the account's performance at any time and can be inconsistent with other asset allocations suggested to a client by LPL, our IARs or FutureAdvisor prior to client entering into the Account Agreement. Achievement of the stated investment objective is a long-term goal for the account, and asset withdrawals can impair the achievement of the client's investment objectives. A Client Profile that includes a conservative risk tolerance over a long-term investment horizon can result in the selection of an Investment Objective that is riskier than would be selected over a shorter-term investment horizon. Clients should contact their IAR if they believe the Investment Objective does not appropriately reflect the information in a Client Profile, such as a client's risk tolerance.

By executing an Account Agreement, clients authorize LPL and FutureAdvisor to have the discretion to buy and sell only ETFs and open-end mutual funds (collectively, "Program Securities") according to the Model Portfolio selected and, subject to certain limitations described in the Account Agreement, hold or liquidate previously purchased non-model securities that are transferred into the account ("Legacy Securities"). In order to be transferred into an account, Legacy Securities must be open-end mutual funds with which LPL has a full or partial selling agreement, ETFs, or individual U.S. listed stocks. Securities that are not Program Securities included within the Model portfolio will not be purchased for an account, and FutureAdvisor, in its sole discretion, will determine whether to hold or sell Legacy Securities, generally, but not solely, with the goal of optimizing tax impacts for accounts that are subject

to tax. Additional Legacy Securities will not be purchased for the account. Clients cannot impose restrictions on liquidating any Legacy Securities for any reason. Clients should not transfer in Legacy Securities that they are not willing to have liquidated at the discretion of FutureAdvisor.

In addition, uninvested cash can be invested in money market funds, the Multi-Bank Insured Cash Account ("ICA"), or the Deposit Cash Account ("DCA"), as applicable, as described in the Account Agreement. Dividends paid by the Program Securities in the account will be contributed to the cash allocation and ultimately reinvested into the account based on the Model Portfolio once the tolerance within cash allocation is surpassed.

Pursuant to the Account Agreement, FutureAdvisor is authorized to perform tax harvesting when deemed acceptable by the Algorithm. LPL, our IARs, and clients cannot alter trades made for tax harvesting purposes. In order to permit trading in a tax-efficient manner, the Account Agreement also grants FutureAdvisor the authority to select specific tax lots when liquidating securities within the account. Although the Algorithm attempts to achieve tax efficiencies, by doing so, a client's portfolio can or will not directly align with Model Portfolio. As a result, a client can receive advice that differs from the advice received by accounts using the same Model Portfolio, and the client's account can perform differently than other accounts using the same Model Portfolio.

During the term of the Account Agreement, FutureAdvisor will perform a daily review of the account to determine if rebalancing is appropriate based on tolerance thresholds established by LPL and/or FutureAdvisor. At each rebalancing review, the account will be rebalanced if at least one of the account positions is outside such thresholds, subject to a minimum transaction amount established by LPL and/or FutureAdvisor. In addition, LPL and/or FutureAdvisor can review the account for rebalancing in the event that the Portfolio Strategist changes a Model Portfolio. FutureAdvisor can delay placing rebalancing transactions for non-qualified accounts by a number of days, to be determined by FutureAdvisor, in an attempt to limit short-term tax treatment for any position being sold. In addition, trading in the account at any given time is also subject to certain conditions, including but not limited to, conditions related to trade size, compliance tests, the target cash allocation, and allocation tolerances. LPL, IARs, and clients can alter the rebalancing frequency.

FutureAdvisor is compensated directly by LPL for its services, including the Algorithm and related software, through an annual sub-advisory fee (tiered based on assets under management by FutureAdvisor, at a rate ranging from 0.10% to 0.17%). As each asset tier is reached, LPL's share of the compensation shall increase, and clients will not benefit from such asset tiers. No additional fee is charged for FutureAdvisor's services.

The Advisor believes that certain clients will benefit from GWP's advisor-enhanced advisory services, particularly due to the relatively low minimum account balance and the combination of a digital advice solution with access to an advisor. Unlike direct-to-consumer robo platforms, our IARs are responsible on an ongoing basis as investment advisors and fiduciaries for the client relationship, including for recommending the Program for the client; providing ongoing monitoring of the Program, the performance of the account, the services of LPL and FutureAdvisor; determining initial and ongoing suitability of the Program for the client; reviewing clients' suggested portfolio allocations; reviewing and approving any change in Investment Objective due to changes clients make to their Client Profile; answering questions regarding the Program, assisting with paperwork and administrative and operational details for the account; and being available to clients to discuss investment strategies, changes in financial circumstances, objectives or the account in general in person or via telephone. Our IARs can also recommend other suitable investment programs if clients have savings goals or investment needs for which GWP is not the optimal solution.

A minimum account value of \$5,000 is required to enroll in the Managed Service.

#### Manager Access Select Program ("MAS")/Manager Access Network ("MAN")

MAS/MAN offers clients the ability to participate in the Separately Managed Account Platform (the "SMA Platform") or the Model Portfolio Platform (the "MP Platform"). In the SMA Platform, WCG will assist the client in identifying a third-party portfolio manager (SMA Portfolio Manager) from a list of SMA Portfolio Managers made available by LPL, and the SMA Portfolio Manager manages the client's assets on a discretionary basis. Advisor will provide initial and ongoing assistance regarding the SMA Portfolio Manager selection process. In the MP Platform, clients authorize LPL to direct the investment and reinvestment of the assets in their accounts, in accordance with the selected model portfolio provided by LPL's Research Department or a third-party investment advisor.

Minimum account values for Manager Access Select vary based on portfolio manager and strategy, starting at \$50,000.

A minimum account value of \$100,000 is required for Manager Access Network, however, in certain instances, the minimum account size may be higher.

#### Schwab Sponsored Advisory Programs

WCG provides advisory services to clients through the following program sponsored by Schwab, but not limited to:

**Managed Account Access** – This wrap fee program sponsored by Schwab provides access to professional money managers. It is a "single contract" structure that allows the Advisor to work with an array of money manager, and the IAR will select from an array of money managers and hundreds of investment strategies. The money managers will manage the accounts on a discretionary basis. The account minimum for the Managed Account Access program is typically \$100,000 for accounts utilizing equities but can be more for fixed income.

#### Managed Variable Annuities

WCG may include the management of Variable Annuity (VA) sub-accounts. WCG has approved various VA carrier products for this service. WCG manages various model portfolios for each VA carrier product. Model portfolio objectives may range from aggressive to conservative. Once the client has completed an Agreement, the various model portfolios are actively managed for the client on a discretionary basis. Sub-account asset allocations are limited by the VA carrier product fund options. Asset allocations may also be restricted by the VA carrier. WCG Financial Advisors who are also Registered Representatives of LPL Financial may receive commissions and/or 12b-1 fees related to the VA contracts.

#### American Funds 529-F-2 Direct -At-Fund Program

WCG has entered into an agreement with American Funds Service Company ("AFS") through which it makes available to clients the 529-F-2 Direct-at-Fund program. The program is a discretionary, fee-based program that facilitates investments into American Funds' 529-F-2 share class offerings directly held at the American Funds. AFS serves as the transfer agent for the program and provides quarterly statements with automated fee-debiting. Shares in this class do not have upfront or a contingent deferred sales charges and do not carry a 12b-1 fee but may have slightly higher administrative costs than other share classes. Clients in this program should consult the fund's prospectus to have a better understanding of the costs and expenses of the specific mutual fund, including the expenses of the 529-F-2 share class. There is no minimum amount to invest in this program.

## Retirement Plan Services

WCG Wealth Advisors, LLC also provides advisory services to retirement plan sponsors and to individual participants holding assets in retirement plans. Services provided to retirement plans covered by ERISA will be identified as WCG Fiduciary Management Services, WCG Fiduciary Consulting Services, or WCG Non-Fiduciary Services in the Advisory Agreement. Clients are required to execute an Investment Advisory Agreement which will disclose the details and provisions of the selected retirement plan services.

For services categorized as WCG Fiduciary Management Services, WCG will act as the Investment Manager as defined by Section 3(38) of ERISA. When providing WCG Fiduciary Management Services, WCG Wealth Advisors, LLC's services include discretionary authority to make investment decisions over assets of a retirement plan. WCG acknowledges that it is a fiduciary with respect to its exercise of investment decisions over these assets of a retirement plan. WCG acknowledges that in performing Fiduciary Management, WCG Wealth Advisors, LLC is acting as a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of the Employee Retirement Income Security Act of 1974 ("ERISA"). WCG Wealth Advisors, LLC will act in a manner consistent with the requirements of a fiduciary under ERISA for all services for which WCG Wealth Advisors, LLC is considered a fiduciary under ERISA.

For services categorized as WCG Fiduciary Consulting Services as defined by Section 3(21) of ERISA, all recommendations of investment options and portfolios will be submitted to the client for the client's ultimate approval or rejection. For WCG Fiduciary Consulting Services, the retirement plan sponsor client who elects to implement any recommendations made by WCG Wealth Advisors, LLC is solely responsible for implementing all transactions.

WCG Fiduciary Consulting Services are not management services, and WCG Wealth Advisors, LLC does not serve as administrator or trustee of the retirement plan. WCG Wealth Advisors, LLC does not act as custodian for any client account or have the authority to initiate third-party disbursements of client funds or securities with the exception of, for some accounts, having written authorization from the client to deduct our fees.

WCG Wealth Advisors, LLC will act in a manner consistent with the requirements of a fiduciary under ERISA for all services for which WCG Wealth Advisors, LLC is considered a fiduciary under ERISA. If a retirement plan has elected to receive WCG Fiduciary Consulting Services and not WCG Fiduciary Management Services, WCG Wealth Advisors, LLC (a) has no responsibility and will not (i) exercise any discretionary authority or discretionary control respecting management of Client's retirement plan, (ii) exercise any authority or control respecting management or disposition of assets of Client's retirement plan, or (iii) have any discretionary authority or discretionary responsibility in the administration of Client's retirement plan or the interpretation of Client's retirement plan documents, (b) is not an "investment manager" as defined in Section 3(38) of ERISA and does not have the power to manage, acquire or dispose of any plan assets, and (c) is not the "Administrator" of Client's retirement plan as defined in ERISA.

Although an investment advisor is considered a fiduciary under the Investment Advisers Act of 1940 and required to meet the fiduciary duties as defined by the Advisers Act, the retirement plan services that are identified as Non-Fiduciary should not be considered fiduciary services for the purposes of ERISA since WCG Wealth Advisors, LLC is not acting as a fiduciary to the Plan as the term "fiduciary" is defined in Section 3(21)(A)(ii) of ERISA. The exact suite of services provided to a client will be listed and detailed in the Investment Advisory Agreement.

### WCG NON-FIDUCIARY SERVICES:

WCG also offers Non-Fiduciary Consulting Retirement Services. The non-fiduciary services listed should not be

considered fiduciary services for the purposes of ERISA since Advisor is not acting as a fiduciary to the Plan. Such services include but not limited to: Participant Education, Participant Enrollment, Due Diligence Review, Fiduciary File Set-up and Benchmarking. Clients are required to execute an Investment Advisory Agreement which will disclose the details and provisions of the selected non-fiduciary plan services.

To the extent required by ERISA Regulation Section 2550.408b-2(c), WCG Wealth Advisors, LLC will disclose any change to the information that we are required to disclose under ERISA Regulation Section 2550.408b-2(c)(1)(iv) as soon as practicable, but no later than sixty (60) days from the date on which we are informed of the change (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable).

In accordance with ERISA Regulation Section 2550.408b-2(c)(vi)(A), WCG Wealth Advisors, LLC will disclose within thirty (30) days following receipt of a written request from the responsible plan fiduciary or Plan Administrator (unless such disclosure is precluded due to extraordinary circumstances beyond our control, in which case the information will be disclosed as soon as practicable) all information related to the Retirement Plan Services Agreement and any compensation or fees received in connection with that Agreement that is required for the Plan to comply with the reporting and disclosure requirements of Title 1 of ERISA and the regulations, forms, and schedules issued thereunder.

#### Rollovers

In accordance with general WCG policy, WCG IARs do not provide recommendations about whether to roll assets out of employer-sponsored retirement Plans. If Client is a participant in an employer-sponsored retirement plan such as a 401(k) plan and decides to roll assets out of the plan into the Account, WCG IARs have a financial incentive to encourage the Client to invest those assets in the Account, because WCG will be paid on those assets, for example, through advisory fees. You should be aware that such fees likely will be higher than those a participant pays through an employer-sponsored plan, and there can be maintenance and other miscellaneous fees. As securities held in employer-sponsored plans are generally not transferable to the Account, commissions and sales charges may be charged when liquidating such securities prior to the transfer, in addition to commissions and sales charges previously paid on transactions in the plan. However, this conflict of interest is mitigated by WCG's policy prohibiting its IARs from recommending clients roll out of employer-sponsored plans into a WCG individual retirement account ("IRA"), though IARs may assist by educating clients on their options as well as various pros and cons of initiating a roll-out of an employer-sponsored plan and may recommend how IRA assets be invested after the client has determined to roll out of the plan.

#### Wrap Fee Program(s)

We are a portfolio manager to a wrap fee program, which is a type of investment program that provides clients with access to several money managers or mutual fund asset allocation models for a single fee that includes administrative fees, management fees, and commissions. If you participate in our wrap fee program, you will pay our firm a single fee, which includes our money management fees, certain transaction costs, and custodial and administrative costs. We receive a portion of the wrap fee for our services. The overall cost you will incur if you participate in our wrap fee program may be higher or lower than you might incur by separately purchasing the types of securities available in the program.

In general, we manage wrap fee accounts on a discretionary basis. Wrap fee accounts are typically more appropriate for active accounts and are managed accordingly. We also manage non-wrap fee accounts on either a discretionary or a non-discretionary basis and may include a different investment strategy in managing non-wrap accounts.

If you participate in a wrap fee program, we will provide you with a separate Wrap Fee Program Brochure

explaining the program and costs associated with the program. You should also review Part 2A thoroughly to evaluate any differences between the services we offer as wrap versus non-wrap.

#### WCG Portfolio Models and Sub-Advisory Services

IARS of WCG as well as IARs of another RIA firm can utilize the services of the WCG portfolio management team which is a separate offering consisting of portfolio design, investment consulting, trade execution, and portfolio rebalancing services. The WCG Team manages the WCG Model Portfolios. The services/portfolios are offered through WCG Advisors, LLC., and the services are generally governed (for RIAs not affiliated with WCG) by a sub-advisory agreement with WCG Advisors, LLC. The WCG portfolio management team can access client accounts through advisors' existing custodians.

The WCG Model Portfolios have required minimums from \$15,000 - \$500,000 depending on the portfolio you choose. IARs of WCG are under no obligation to utilize these services and WCG Clients who utilize this service are not charged a separate fee. The IARs pay for these services themselves as a business expense.

#### Financial Planning Services

##### A. CONSULTING AND FINANCIAL PLANNING SERVICES

Our IARs can provide consulting and financial planning services ("Consulting and Financial Planning Services"), which includes preparing and providing clients with a written financial plan if requested by the client. Financial planning services are based on an analysis of the client's current financial circumstances, goals, and objectives. Provision of these services typically necessitates that the client provides the IAR with personal data such as family records, budgeting, personal liability, estate information, and additional financial goals. WCG's Consulting and Financial Planning services include any or all of the following services as requested and/or directed by the client: information and recommendations regarding tax planning, investment planning, retirement planning, estate needs, business needs, education planning, life and disability insurance needs, long-term care needs, cash flow/budget planning, asset protection, multi-generational planning, charitable gifting, and risk management. The services consider information collected from the client such as financial status, investment objectives, and tax status, among other data. Fees for such services are negotiable and detailed in the client agreement.

Implementation of our consulting recommendations or financial plan recommendations is entirely at the client's discretion. The Advisor is not qualified to, and does not, offer legal or accounting advice. If a client would like help with tax or legal advice, there are several options. In most cases, our advisors will refer clients to an accountant, attorney, or other specialists as necessary for advisory-related services. If feasible, advisors may facilitate the completion of estate planning documents through a third-party vendor. The third-party vendors will write documents and provide legal advice through websites or client portals. Our IARs are only facilitating the completion of documents and not providing legal advice to clients. The client is responsible for all information provided to the third-party vendor or advisor to assist in the completion of documents. The third-party vendor is a separate and unaffiliated entity from WCG and clients are under no obligation to use such vendor to create legal documents and the client is free to accept or reject any recommendation from WCG in this regard. The decision to use such a vendor is at the sole discretion of the client. Consulting and Financial Planning Services are provided pursuant to a separate written Financial Planning and Hourly Consulting Agreement with the client.

#### Comprehensive Financial Planning

Generally, financial planning services are based on an analysis of the client's current financial circumstances, goals, and objectives. This involves a process of information gathering by the IAR, then preparation of a financial plan or other written report. Specifically, Comprehensive Financial Planning will address each of the key areas of financial planning:

- Final Expenses
- Insurance Planning
- Investment Planning
- Tax Planning
- Divorce
- College Education
- Major Purchase Planning
- Cash Flow Planning
- Retirement Planning
- Estate Planning
- Business Succession
- Wealth Accumulation

Our written financial plans are provided to clients or financial planning consultations rendered to clients and usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations can be made that the clients begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs.

For Comprehensive Financial Planning engagements, we provide our clients with a written summary of their financial situation, observations, and recommendations. Financial plans or consultations are typically completed within five (5) months of a client signing a contract with us, provided that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client. Clients are free to implement investment recommendations through brokers unaffiliated with WCG or its IARs.

#### Subscription-Based Financial Planning Services

The Advisor has the ability to offer Financial Planning services on a subscription (flexible payment) fee basis. Please see Item 5 below for a description of subscription-based financial planning.

#### Hourly Consulting Services

General hourly consulting services are provided for a variety of purposes including, but not limited to:

- Annual Update to Financial Plan
- Asset Allocation Recommendations
- Portfolio Management Recommendations
- Individual Issue Consulting
- Third-Party Review (2nd opinion)

For hourly consulting engagements, we usually do not provide our clients with a written summary of our

observations and recommendations as the process is less formal than our financial planning services. Implementation of any recommendations or the next steps to be taken will be at the discretion of the client.

#### Advisor Resource Center Services

IARs of WCG can utilize the services of WCG's Advisor Resource Center ("ARC") which is a separate offering consisting of financial planning design, consulting, and administrative costs. These services are offered through WCG Wealth Advisors, LLC. IARs of WCG are under no obligation to utilize the ARC services and WCG Clients whose IARs utilize the ARC services are not charged a separate fee. The IARs pay for these services themselves as a business expense. Accountant/Tax Preparer/Real Estate Agent

WCG does not serve as an accountant/tax preparer/real estate agent or attorney in law for any client and no portion of WCG's services should be construed as the same. Some of WCG's supervised persons recommend tax preparation services or could be real estate agents, certified public accountants or attorneys in law, in their individual capacities. Their activities are separate and apart from WCG and any services or advice rendered in that capacity, is not provided by or through WCG. See Item 10 for additional information.

#### Referrals to Third Parties

To the extent requested by a client, WCG will recommend the services of other professionals for certain non-investment implementation purposes (i.e., attorneys, accountants, third-party vendors etc.). 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 is free to accept or reject any recommendation from WCG in this regard. Please Note: If the client engages in any such recommended professional as set forth above, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

## Item 5: Fees and Compensation

#### Fees for Advisory Accounts

WCG and its Advisors offer a variety of services and manage a broad range of client accounts with different mandates, fee structures and expenses. WCG's Advisors charge differing investment advisory fees based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.). This is also a conflict of interest, as it creates a financial incentive for WCG Advisors to provide preferential treatment to one account over others in terms of allocation of management time, resources, and investment opportunities. In addition to disclosing these conflicts of interest, WCG has created and implemented a compliance and supervisory program to mitigate such conflicts through the oversight of client accounts and investment advisory activities. WCG mitigates these conflicts of interest, in part, by endeavoring to act in each client's best interest and through the adoption and implementation of WCG's Code of Ethics and other policies and procedures. See Item 11 for additional information.

Generally, fees are due and payable, and deducted from your account by the custodian in advance or arrears based upon the market value of the client's account assets as of the close of business on the last day of the previous calendar quarter. At no time will the Management Fee assessed by WCG exceed 2.0% of the gross assets under management (valued at fair market value).

It is important to note that the fees charged to clients vary based on the investment adviser representative advising



the account. An advisor can negotiate the fees at their sole discretion with the client, based on the complexity of the customer's situation, the scope of services provided, time commitment, and the experience and expertise of the advisor. Please note the Advisor may group certain related Client accounts, often known as "householding", for the purposes of achieving the minimum account size and determining the annualized fee. The advisory fee will be disclosed as an "Exhibit A" attached to the investment management agreement. In addition, fee schedules are set forth by the platform provider and agreed upon and monitored by WCG in their sole discretion with the client, so long as such fees fall within the ranges approved by the Advisor.

We will bill you for our investment advice through LPL Financials' billing system, or through third-party billing systems for accounts custodied at LPL, Schwab and Fidelity. For clients who are billed based on a percentage of account assets, quarter-end fee assessments will be calculated using one of the following methodologies:

Using the LPL Financial system, the fee is calculated by taking the value of the account (based on the fair market value as assessed by the qualified custodian on the last day of the quarter) and multiplying that value by your advisory fee, the result is then divided by 360, representing days per accounting year and multiplying that result by the number of days in the month (based on 30 days in the month).

Using third-party systems, the fee is calculated the same way except based on 365/366 days per accounting year and the actual days in the month.

Note: LPL's quarter-end fee assessment is based on the settlement date and the third-party is based on the valuations of the last day of the quarter. Because of the different accounting methods, there may be slight variances in your assessed investment advisory fee. However, both methods are acceptable accounting practices. If you have any questions regarding the differences in fee calculation methods or how your fees are assessed, you are highly encouraged to contact WCG for further guidance.

The advisory relationship can be terminated by the client or by third parties to the contract in accordance with the provisions of the Investment Advisory Agreement and Platform/TAMP paperwork. The client receives a pro-rata refund of any prepaid unearned advisory fees. Any unpaid fees become immediately due and payable. Clients receive an account statement from their custodian at least quarterly. The statement includes the amount of any fees paid directly to WCG. Clients should note that the same or similar services to those described above can be available elsewhere at a lower cost to the client.

Custodian-sponsored programs, third-party investment managers or programs may require a minimum asset level or charge a minimum fee, and clients should be aware that the imposition of minimum fees by another entity will result in a higher fee being charged than is described in this Brochure, particularly where partial withdrawals by the client reduce asset levels. As noted above, generally advisory fees assessed by WCG do not include the manager's fee, nor does it include brokerage commissions and other trading costs of transactions (such as mark-ups and mark-downs); mutual fund 12b-1 fees; sub-transfer agent, networking and omnibus processing fees; transfer taxes, fund management fees, and administrative servicing fees; certain deferred sales charges on previously purchased mutual funds and other transaction charges and service fees, IRA and Qualified Retirement Plan fees; administrative servicing fees for trust accounts; and other taxes and charges required by law or imposed by exchanges or regulatory bodies. Fees for these platforms are found in the custodian sponsor/sponsor's or manager's Form ADV Part 2A brochure (or the applicable agreements), which will be delivered to the client prior to the commencement of investing in the platform. Clients typically authorize the deduction of third-party investment managers' or program's fees from the client's custodial account. Fees for similarly situated accounts will differ due to the negotiation of the advisory fee with the IAR, the size of the account, the complexity of the client's servicing needs, long-term or family relationship with the IAR, and services requested, and time commitment.

Further information regarding fees and charges assessed by any mutual funds, variable annuities, and exchange-traded funds which are passed down to a client are further outlined in the sponsor's or manager's Form ADV, and in that mutual fund's or annuity's prospectus and other disclosure documents, which are available upon request by contacting your IAR.

Important information related to the fees for all available investment platforms are described in additional detail below.

#### Asset-Based Pricing ("ABP") Fee

WCG Program clients can choose to pay one fee for advisory services and transaction charges. WCG advisors can choose an Asset-Based Fee (ABP) through accounts custodied at LPL Financial or transaction-based pricing. An ABF is a percentage charge on the dollar amount of assets in the account in lieu of individual transaction fees on trades executed in the account. The ABF is in addition to the advisory fee charged by the WCG Financial Advisor and in addition to the administrative fee (where applicable). The asset-based fees applicable to your account were negotiated based on the total amount of assets collectively maintained with the custodian of the assets. The ABF is calculated and paid to the custodian directly each month and is used to cover the transaction expenses to implement and trade the individual investment positions in the account.

#### Transaction-Based Pricing ("TBP") Fee

Schwab, Fidelity and LPL offer custodial transaction-based pricing fees. The custodial transaction-based charges are billed by and paid to the custodian, on trade date, when a transaction is executed through the custodian and is based on the specific security or investment involved in the transaction. Custodial transaction-based charges are deducted from WCG's wrap fee or, as applicable, deducted from the client's non-wrap fee account. The custodial transaction-based charges cover various transaction costs, such as mutual fund fees, brokerage commissions and mark-ups/mark-downs for fixed income securities.

If a client chooses to pay individual transaction fees and based on historic and anticipated levels of trading volumes, clients with larger account values may have lower overall transaction costs by choosing to pay the individual transaction fees from their account. You can discuss your specific situation and preference with your Financial Advisor.

#### LPL Financial ("LPL") platforms:

Strategic Wealth Management ("SWM") - The SWM platform is an open architecture, fee-based investment platform. Through this platform, clients can consolidate multiple investments into one account and receive one statement. The platform is available in two forms, the selection of which is mutually determined at the inception of the engagement.

SWM – clients pay both the advisory fee and all transaction costs and any commission if applicable. Clients authorize LPL to deduct from their Account the transaction charges and other fees applicable to the Account. The transaction charges are paid to LPL to defray costs associated with trade execution; however, they are not directly related to transaction-related expenses of LPL and are a source of revenue to LPL. The transaction charges vary depending on the type of security being purchased or sold (e.g., currently \$9 for equities). In the case of mutual funds, the transaction charges vary depending on whether LPL retains compensation from the mutual fund for services it

provides to the fund, such as recordkeeping fees and asset-based service fees or sales charges. LPL uses that compensation from mutual funds to reduce its trading costs, and therefore, assesses a lower transaction charge to clients. Mutual fund transaction charges are currently either \$0 or \$26.50. LPL does not charge a transaction charge for fixed-income securities (e.g., bonds or structured products); however, LPL acts as principal on fixed-income security transactions and receives a markup/down on the transaction. WCG does not share or participate in any such transaction fees, commissions, or 12b-1 fees, if applicable. 12b-1 fees are marketing and distribution fees on a mutual fund. The 12b-1 fee is considered to be an operational expense and, as such, is included in a mutual fund's expense ratio.

SWM ("WCG Wrap Accounts") – Transaction costs are included in a single fee that covers both advisory fees and transaction costs, the latter of which is paid by the adviser. Please refer to the WCG Wrap Brochure for more information. WCG and/or the IAR have the option to negotiate asset-based pricing with the custodian for a flat basis point or flat fee to cover all the transaction charges or will pay the standard transaction fees. It is important to remember that the IAR can charge a higher overall advisory fee in order to offset their cost for the transaction charges involved in the management of the portfolio. The appropriateness of SWM II can depend on a number of factors, including, among other things, client investment objectives and financial situation, frequency of withdrawals from the accounts, the IAR's investment strategies and trading patterns including the frequency of trading, and the number and size of the transactions. Clients should consider that depending upon the level of the fee charges, the amount of portfolio activity in their accounts, the value of services that are provided, and other factors, SWM II can exceed the aggregate cost of services if they were to be provided separately. A transaction-based pricing arrangement can be more cost-effective for accounts that do not experience frequent trading activity or client withdrawals which would increase the number of transactions. WCG primarily utilizes mutual funds that are part of the custodian's No-Transaction Fee (NTF) platform. This platform allows WCG to buy mutual funds without transaction fees being charged to the account. The client may still pay fees associated with mutual fund family fees that are described in their prospectus and the custodian's fee disclosure. Although clients do not pay a transaction charge for transactions

In some SWM accounts, WCG can pay LPL transaction charges for those transactions. The transaction charges paid by Advisor vary based on the type of transaction (e.g., mutual fund, equity, or ETF) and for mutual funds based on whether or not the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL. Because Advisor pays the transaction charges in these accounts, there is a conflict of interest in cases where the mutual fund is offered at both \$0 and \$26.50. Clients should understand that the cost to WCG of transaction charges may be a factor that Advisor considers when deciding which securities to select and how frequently to place transactions in this type of account. In many instances, LPL makes available mutual funds in a SWM II account that offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as "Class I," "institutional," "retail," "service," "administrative" or "platform" share classes ("Platform Shares"). The Platform Share class offered for a particular mutual fund in SWM II in many cases will not be the least expensive share class that the mutual fund makes available and was selected by LPL in certain cases because the share class pays LPL compensation for the administrative and recordkeeping services LPL provides to the mutual fund. Client should understand that another financial services firm may offer the same mutual fund at a lower overall cost to the investor than is available through SWM II.

Although WCG does not offer/sell Class A share mutual funds, it is important to note that A Shares typically pay LPL a 12b-1 fee for providing brokerage-related services to the mutual funds. Platform Shares are generally not subject to 12b-1 fees. As a result of the different expenses of the mutual fund shares classes, it is generally more expensive for a client to own Class A Shares than Platform Shares. An investor in Platform Shares will pay lower fees over time, and keep more of his or her own investment returns than an investor who holds Class A Shares of the same fund. Clients should consider any additional indirect expenses borne as a result of mutual fund fees when negotiating and discussing with their Advisor the advisory fee for the management of an account.

## Fees for LPL Third-Party Sponsored Advisory Services

The account fee charged to the client for each LPL Sponsored advisory program is negotiable, subject to the following maximum account fees:

- MWP Platform 2.95% (LPL program fee, strategist fee, and an advisor fee)
- OMP Platform 2.50% (LPL program fee and an advisor fee)
- PWP Platform 2.95% (LPL fee, separate account manager fees, and an advisor fee)
- MAS Platform 2.95% (LPL program fee, manager fee, and an advisor fee)
- MAN Platform 2.95% (LPL program fee, manager fee, and an advisor fee)
- GWP Platform 1.35% (LPL program fee and an advisor fee)

The platform fees for the MWP, OMP, PWP, MAS, MAN and GWP platforms are negotiable and calculated by LPL at the beginning of each quarter based on the value of the client's assets invested in the platform as of the close of business on the last day of the preceding quarter. LPL will deduct the full platform fee from the client's platform account as authorized by the client in the platform agreement, unless other arrangements have been agreed to in writing, and will pay WCG its advisory fee. LPL's refund policy is fully outlined in the LPL disclosure brochure for each platform, which is provided to platform clients and should be fully reviewed upon receipt.

With regard to accounts utilizing third-party portfolio managers under aggregate, all-in-one account fee structures (including MAS, MAN, PWP, and the legacy MWP fee structure), because the portion of the account fee retained by WCG varies depending on the portfolio strategist fee associated with a portfolio. WCG has a financial incentive to select one portfolio instead of another portfolio. Since we are acting as a fiduciary, we have an obligation to do what is in the best interest of the client. Please refer to the relevant LPL Form ADV program brochure for a more detailed discussion of conflicts of interest.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. The custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. An invoice may be sent to clients for non-fiduciary management services showing the amount owed.

Clients may terminate the agreement without penalty for a full refund of WCG Wealth Advisors, LLC's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

WCG receives compensation as a result of a client's participation in an LPL program. Depending on, among other things, the type and size of the account, the type of securities held in the account, changes in its value over time, the ability to negotiate fees or commissions, the historical or expected size or number of transactions, and the number and range of supplementary advisory and client-related services provided to the client, the amount of this compensation may be more or less than what WCG would receive if the client participated in other programs, whether through LPL or another sponsor or paid separately for investment advice, brokerage, and other services.

Clients should consider the level and complexity of the advisory services to be provided when negotiating the account fee (or the advisor fee portion of the account fee, as applicable) with WCG.

Custodial account and other service fees are not covered by the annual wrap fee, including, but not limited to,

mutual fund fees and exchange-traded fund charges imposed directly at the fund level (e.g., management fees and other fund expenses), margin interest, account activity fees, and any fee associated with maintaining a retirement account charged by the custodian of the qualified account. Additionally, for wrap accounts held at LPL the client will incur a ticket charge for foreign stock transactions.

#### Payment of Fees

#### Explanation of Financial Planning Services Fees Provided

WCG Wealth Advisors, LLC is configured to charge a fee for financial planning advice through the following three services:

##### One-Time Fixed Engagement

A one-time fixed engagement will develop and deliver customized financial advice tailored to the client's unique financial situation. The client relationship in this engagement terminates once the recommendations addressing all the client's specific financial objectives have been delivered to the client and all questions and concerns regarding those recommendations have been addressed. The total timeframe for a fixed engagement shall not exceed 12 months. A personal financial management website provided through a third-party may or may not be included and shared with the client during the scope of this engagement. This provides the client with secure access to an online website in which they'll have the ability to aggregate all of their financial accounts into one place, a vault to upload personal documentation into, and the ability to view on-demand financial reports that may include but are not limited to; cash flow, balance sheet, and income/expense projections. Fees for a comprehensive fixed engagement plan can range from \$1,500 - \$30,000 or a situational financial plan (3 modules or less) can range from \$500 - \$5,000. All fees depend upon the nature and complexity of the services desired.

Fees for ongoing financial advice are charged at a non-negotiable monthly rate. Fees will be billed directly to the client each month and are due upon receipt of the billing statement.

For new financial planning clients, the first 12 months of ongoing financial advice will include all the services listed in the one-time fixed engagement model. In addition, the client will have access to a secure personal financial management website provided by a third party. Access to the personal online website will enable the client to aggregate all their eligible financial accounts into one central place, upload personal documentation, and view on-demand financial reports. The financial reports may include but are not limited to, cash flow, balance sheet, and income/expense projections. Beyond the first 12 months, clients receiving ongoing financial advice will be provided an annual progress report which will include, at a minimum, the client's updated net worth statement and a comparison of their financials from previous years. Other areas of analysis may also be included, as agreed upon by the financial advisor and the client. Clients will also receive continued access to their personal financial management website and unlimited access to their financial advisors who are available to answer questions.

Existing financial planning clients who have previously received a comprehensive financial plan and wish to engage in ongoing financial advice will immediately begin to receive an annual progress report which will include, at a minimum, the client's updated net worth statement, as well as a comparison of their financials from previous years. Other areas of analysis may also be included, as agreed upon by the financial advisor and the client. In addition, clients will receive continued access to their personal financial management website, as well as unlimited access to their financial advisors who are available to answer questions. This progress report fee can range from \$500 - \$120,000.

## Hourly Consulting

WCG Wealth Advisors, LLC, through its IARs, provide consulting services on an hourly basis. These services may include, as selected by the client in the consulting agreement, advice regarding tax planning, investment planning, retirement planning, estate planning, cash flow/budget planning, business planning, education planning, and personal financial planning. The services consider information collected from the client such as financial status, investment objectives, and tax status, among other data. The investment advisor representatives may or may not deliver to the client a written analysis or report as part of the services. The investment advisor representatives tailor the hourly consulting services to the individual needs of the client based on the investment objective chosen by the client. The engagement terminates upon final consultation with the client. The negotiated hourly fee for these services is between \$100 to \$400. The fee is based on complexity and the Investment Adviser(s) time for participating. The focus of hourly consulting is generally on a specific area of financial concern. Fees are charged either 50% or 100% in advance but never more than six months in advance. If 50% in advance, the remainder is due upon presentation of the plan.

## Termination of Services

This agreement may be terminated by either party involved. For one-time fixed engagements, the first 12 months of ongoing financial advice, and hourly consulting, no refunds will be made after a signed delivery acknowledgment of a financial plan is received. Prior to plan receipt of a signed delivery acknowledgment, a client may receive a full refund at any time once a receipt of written notice to terminate is received by either party. Monthly ongoing financial advice can be terminated at any time upon receipt of a 30-day written notice by either party. There will be no partial month refunds.

Clients will still have full service for the month a 30-day written notice is received/and or given and monthly payments will terminate upon completion of that month. Termination of the agreement will not affect the liabilities or obligations of the parties for activity initiated prior to termination.

WCG Wealth Advisors, LLC collects its one-time fixed engagement and hourly consulting fees, either 100% in advance, 50% in advance, and 50% upon delivery. The monthly fee for ongoing financial advice is charged in advance on the 1st of each month. If the execution of the fee agreement for ongoing financial advice is signed mid-month, the first payment will be billed on the first of the month following the date of the signed agreement. WCG offers clients the ability to pay by check, credit card, or via ACH debit for planning services.

The financial plan may include generic recommendations as to general types of investment products or specific securities which may be appropriate for the client to purchase given his/her financial situation and objectives.

The client is under no obligation to act upon the investment advisor's recommendation or purchase such securities through WCG Wealth Advisors, LLC, and the IAR. However, if the client desires to purchase securities or advisory services to implement his/her financial plan, WCG Wealth Advisors, LLC may make a variety of products and services available through its IARs. This may result in the payment of normal and customary commissions, advisory fees, or other types of compensation to WCG Wealth Advisors, LLC, and the IAR.

A conflict exists between the interests of the investment advisor and the interests of the client. Depending on the type of account that could be used to implement a financial plan, such compensation may include (but is not limited to) advisory fees, commissions; mark-ups and mark-downs; transaction charges; confirmation charges; small account fees; mutual fund 12b-1 fees; mutual fund sub-transfer agency fees; hedge fund, managed futures, and

variable annuity investor servicing fees; retirement plan fees; fees in connection with an insured deposit account program; marketing support payments from a mutual fund, annuity, and insurance sponsors; administrative servicing fees for trust accounts; referral fees; compensation for directing order flow; and bonuses, awards or other things of value offered by WCG Wealth Advisors, LLC to the IAR. To the extent that IAR recommends that the Client invests in products and services that will result in compensation being paid to WCG Wealth Advisors, LLC, and the IAR, this presents a conflict of interest. This compensation to IAR and WCG Wealth Advisors, LLC may be more or less depending on the product or service that IAR recommends. Therefore, the IAR has a financial incentive to recommend that a financial plan be implemented using a certain product or service over another product or service. However, your IAR may only recommend a product or service that he or she believes is suitable and in your best interests in accordance with the applicable standards under the Investment Advisors Act.

The IAR may receive additional cash or non-cash compensation from advisory product sponsors. Such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives.

Transactions in LPL Financial advisory program accounts are generally affected through LPL Financial as the executing broker/dealer.

Neither WCG nor any investment adviser representatives are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or representative of the foregoing.

The specific manner in which fees are charged by WCG is established in a client's written agreement between the client and WCG Wealth Advisors, LLC – up to 2.0% of assets under management. Clients can determine whether to engage the services of WCG Wealth Advisors, LLC on a discretionary or non-discretionary basis. WCG's annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under WCG's management to be charged quarterly in advance based on the balance on the first day of the billing quarter, and WCG Wealth Advisors, LLC's representatives may at their discretion negotiate a fee in accordance with the above fee schedule. Fees for Financial Planning and Hourly Consulting services are subject to negotiation and at the discretion of WCG, will differ from the above schedules due to the size of the total estate, complexity, additional services needed, time commitment, and recurring revenue from an advisory account.

#### Fees for Retirement Plan Services

For the Retirement Plan Services provided by WCG Wealth Advisors, LLC, clients will be charged a fee as described in the Advisory Agreement. Fees are charged on a quarterly basis in either advance or arrears. In the event the fees are charged in advance, the fee will be based on the first day of the billing period. In the event fees are charged in arrears, the fee will be based on the balance on the last day of the quarter. Payments for services are due within thirty (30) days after the quarter's end.

WCG Wealth Advisors, LLC will not be compensated based on capital gains or capital appreciation of the funds held by the Plan. WCG Wealth Advisors, LLC will not maintain custody of any Plan assets. Clients will authorize any broker-dealer or mutual fund sponsor that maintains custody of the Plan's assets to automatically deduct all fees owed to WCG Wealth Advisors, LLC from the Plan's assets and to pay such fees directly to WCG Wealth Advisors, LLC when they are due.

Fees are prorated (based on the number of days services will be provided) for partial billing periods. If services begin



other than on the first day of the quarter, the prorated fee for the initial partial quarter will be calculated on the total plan(s) value on the last day of that initial calendar quarter, billed in arrears, and prorated from the effective date of the Agreement.

The initial pro-rated fee for the initial partial quarter's services will be billed at the same time as the first full quarter's fees are billed in advance.

WCG Wealth Advisors, LLC believes that its annual fee is reasonable in relation to the services provided and the fees charged by other retirement plan consultants, including investment advisers, offering similar services/programs. However, WCG Wealth Advisors, LLC's annual fee may be higher or lower than that charged by other consultants offering similar services and programs. In addition to WCG Wealth Advisors, LLC's compensation, clients will incur charges imposed at the investment level (e.g., mutual fund advisory fees and other fund expenses) and charges imposed by the Plan's custodian and Third-Party Administrator (if applicable). A description of mutual fund fees and expenses is available in each mutual fund prospectus.

The Plan's custodian or the Third-Party Administrator to the Plan will send statements to the Plan, at least quarterly, showing all disbursements from the Plan, including, if applicable, the amount of the fee paid to WCG Wealth Advisors, LLC directly from the Plan and when a such fee is deducted directly from the Plan. Any discrepancies between fee billing notices received from WCG Wealth Advisors, LLC and the statements received from the Plan custodian or Third-Party Administrator should be immediately reported to WCG Wealth Advisors, LLC and/or to the issuer of the account statements (the Plan custodian or Third-Party Administrator).

Brokerage commissions and/or transaction ticket fees charged by the custodian will be billed directly to the client by the custodian. WCG Wealth Advisors, LLC will not receive any portion of such brokerage commissions or transaction fees from the custodian or the client.

The fees charged by WCG Wealth Advisors, LLC are in addition to other costs charged by third parties for custodial, legal, accounting, or record-keeping tasks. In addition, the client may incur certain charges imposed by third parties other than WCG Wealth Advisors, LLC in connection with investments made through the Plan, including but not limited to, 12(b)-1 fees and surrender charges, variable annuity fees and surrender charges, and qualified retirement plan fees.

WCG Wealth Advisors, LLC does not expect to receive any other compensation, direct or indirect, for its services. If WCG Wealth Advisors, LLC receives any other compensation for such services, we will (i) offset that compensation against its stated fees, and (ii) will disclose the amount of such compensation, the services rendered for such compensation, and the payer of such compensation to the client.

The Retirement Plan Services may be terminated by either party at any time without penalty upon receipt of thirty (30) days' written notice of termination. There is no penalty or "termination fee" for the termination of services. If either party terminates the services during a billing quarter, the client will be charged a pro-rated fee based on the number of days that services were provided and if WCG Wealth Advisors, LLC has received fees in advance, we will promptly issue a pro-rated refund to the client.

The hourly consulting fee will be based on the type of services to be provided, experience and expertise, and the sophistication of the client. The maximum hourly fee to be charged to any client will not exceed \$ 400 without extenuating circumstances and approval by the Chief Compliance Officer.

If a client desires, a client can engage certain representatives of WCG, in their individual capacities as Registered Representatives of LPL Financial, an SEC registered and FINRA/SIPC member broker-dealer, to implement investment



recommendations on a commission basis. In the event a client chooses to purchase investment products through LPL Financial, LPL Financial will charge brokerage commissions to effect securities transactions, a portion of which commissions LPL Financial shall pay to WCG's representatives, as applicable. The brokerage commissions charged by LPL Financial may be higher or lower than those charged by other broker/dealers.

In addition, LPL Financial, as well as WCG's representatives, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

The recommendation that a client purchase a commission product from LPL Financial presents a conflict of interest, as the receipt of commissions, provides an incentive to recommend investment products based on commissions received, rather than on a client's need. No client is under any obligation to purchase any commission products from LPL Financial. WCG's Chief Compliance Officer or compliance staff is available to address any questions that a client or prospective client may have regarding this conflict of interest.

LPL Financial charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, and commissions are charged for individual equity and debt securities transactions). LPL Financial enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. LPL Financial commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by LPL Financial may be higher or lower than those charged by other custodians and broker/dealers. Clients may direct their brokerage transactions at a firm other than LPL Financial. Advisory fees are generally not reduced to offset commissions or markups.

When dealing with investment advisory clients and services, Investment Advisor Representatives have an affirmative duty of care, loyalty, honesty, and good faith to act in the best interests of their clients. IARs are required to fully disclose all material facts concerning any conflict that does arise with these clients and should avoid the appearance of a conflict of interest.

WCG and IARs must abide by honest and ethical business practices including, but not limited to:

- Not inducing trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account;
- Making recommendations with reasonable grounds to believe that they are appropriate based on the information furnished by the client;
- Placing discretionary orders only after obtaining the client's written trading authorization contained within the advisory agreement or via separate amendment;
- Not borrowing money or securities from, or lending money or securities to a client;
- Not placing an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in the specific state.

WCG and the IAR will:

- Allocate securities in a manner that is fair and equitable to all clients
- Not affect agency-cross transactions for client accounts

All IARs of WCG Wealth Advisors, LLC are required to sign an acknowledgment of their understanding and acceptance of these terms.

Clients may purchase investment products recommended by our firm through other broker-dealers or agents.

When WCG's representatives sell an investment product on a commission basis, WCG does not charge an advisory fee in addition to the commissions paid by the client for such a product. When providing services on an advisory fee basis, WCG Wealth Advisors, LLC representatives do not also receive commission compensation for such advisory services (except for any ongoing 12b-1 trailing commission compensation that is received as previously discussed). However, a client may engage WCG to provide investment management services for an advisory fee and purchase an investment product from WCG's representatives on a separate commission basis.

Fees for customized and participant advisory services are typically based on the value of assets under management and will vary by engagement. The amount of the fee will be set out in the client agreement executed by the client at the time the relationship is established. The advisory fee is negotiable between the investment advisor representative and the client and is payable in advance as described in the client agreement.

The agreement will state how the client can obtain a refund of any pre-paid fee if the agreement is terminated before the end of the billing period.

In most cases, a third-party broker-dealer will provide trade execution. In such cases, the broker-dealer may charge clients commissions, markups, markdowns, and/or transaction charges.

Advisor receives compensation because of a client's participation in an LPL Financial program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what the Advisor would receive if the client participated in other programs, whether through LPL Financial or another sponsor or paid separately for investment advice, brokerage, and other services.

LPL Financial serves as a program sponsor, investment advisor, and broker/dealer for the LPL advisory programs. WCG Wealth Advisors, LLC and LPL Financial may share in the account fee and other fees associated with program accounts. Associated persons of Advisor may also be Registered Representatives of LPL Financial.

Lower fees for comparable services may be available from other sources.

IARs may also be licensed insurance agents through various Insurance agencies including WCG Insurance, LLC an affiliated entity. In the capacity of an insurance agent, they recommend the purchase of certain insurance-related products on a commission basis.

The purchase of securities/insurance commission products presents a conflict of interest, as the receipt of commissions provides an incentive to recommend investment/insurance products based on commissions received, rather than on a client's need. As a fiduciary, we can only recommend products that are in the best interest of the client and no client is under any obligation to purchase any commission products from an investment advisor representative of the WCG. Clients may purchase investment/insurance products recommended by investment advisory representatives through other, non-affiliated broker/dealers or insurance agents. Such conflicts are subject to review by the Chief Executive Officer and the Compliance department for consistency with WCG's Code of Ethics.

Private Trust Company, N.A.

Please Note: LPL is affiliated with Private Trust Company, N.A., a trust company licensed in all 50 states under a national bank charter ("PTC"). To the extent that a client elects to utilize LPL as their custodian, LPL will direct the

client's IRA assets to be held at PTC. As such, clients can incur an Annual IRA maintenance fee charged by PTC. Any Annual IRA maintenance fees incurred by the client shall be separate and in addition to WCG's investment advisory fee.

#### Clearing and Custody Arrangements

LPL Financial, Schwab, and Fidelity Brokerage Services can execute trades, settle securities transactions, and custody client assets on behalf of our clients using our Services. For further details concerning these arrangements, clients should refer to the Investment Advisory Agreement and/or other related disclosure documents relative to the type of account they select. Each of the custodians utilized by WCG has miscellaneous accounts and other charges that are borne solely by the client and are deducted from the client's wrap fee account or, as applicable non-wrap fee account. These custodial account and other service charges are billed by and paid to the custodian, based upon the specific custodial account or service, including, but not limited to, wire fees, transfer fees, margin interest, account activity fees, and any fee associated with maintaining a retirement account charged by the custodian of the qualified account. Custodians may waive custodian account and other service charges based on a level of assets maintained in the account, and the asset level or other conditions for a fee waiver may be higher or lower than those required by other custodians. Furthermore, a WCG Advisor, at the Advisor's sole discretion, may pay any custodial account and other charges.

Due to the unique nature of fee-based variable annuities, they must be maintained directly with the variable annuity sponsor. Neither the IAR nor WCG creates or forwards client account statements or confirmations relating to variable annuities. This responsibility remains exclusively with the variable annuity sponsor. All subaccount reallocations are directed to and executed at the variable annuity sponsor. Fee-based Variable annuities are not assessed transaction fees since the reallocation of transactions are placed directly with the variable annuity sponsor.

In order to address a client's specific situation, WCG Advisors may recommend non-tradable assets (e.g., annuities or structured products) be purchased in an advisory account. The client would not be charged commissions for such investment products, but these products would be subject to the advisory fees calculated based on assets held in the advisor's account(s).

#### Third-Party Advisory Fees

Compensation for third-party advisory fees generally, consists of three elements: i) management and advisory fees shared by the Third-Party Advisory Services, Advisor, and its IARs; ii) transaction costs – if applicable – which may be paid to purchase and sell such securities; and iii) custody fees. A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions, and other aspects of each program are detailed and disclosed in: i) the Third-Party Investment Advisory Service's from ADV Part II; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager or managers selected; or, iv) the Third-Party Advisory Service's account opening documents.

WCG also acts as a solicitor for referring potential clients to third-party investment advisory firms. As set forth in the written agreement relating to such arrangements, WCG will receive a portion of the annual management fee that the third-party advisory firm collects from the referred client. To the extent that WCG receives compensation for such referrals, a conflict of interest exists because WCG will be inclined to recommend advisors from which Advisor receives a referral fee. Please see Item 14 for additional information.

WCG endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic or other benefits by WCG in and of itself creates a conflict of interest and may influence WCG's choices for investments, custodial services, third-party investment managers and TAMPs. Additionally, the receipt of

economic or other benefits by WCG Advisors in and of itself creates a conflict of interest and may influence the Advisors' recommendations to clients. Furthermore, a conflict of interest arises in that WCG Advisors have an incentive to increase the assets held in an advisory account (wrap or non-wrap) as it increases the investment advisory fee paid to WCG and its Advisors. Similarly, a conflict of interest arises in that WCG's advisors in some cases, have a disincentive to trade securities in order to reduce the custodial transaction-based charges in a wrap account, thereby increasing the wrap fee amount retained by WCG and its Advisors. Wrap fees and custodial charges may be higher or lower than those charged by other investment advisors. The investment strategy, investments and related transactions will impact whether a client will pay more in a non-wrap versus a wrap fee account.

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

WCG Wealth Advisors, LLC does not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the Fees and Compensation section above and are not charged based on a share of capital gains upon, or capital appreciation of, the funds in your advisory account. WCG Wealth Advisors, LLC does not provide advisory services to such clients as a hedge fund or other pooled investment vehicles.

## Item 7: Types of Clients

There are minimum account size requirements for some WCG Advisory services offered through WCG or established and the individual IARs that are affiliated with WCG. In addition, there can be a minimum account size requirement established by the particular program. These minimum account size requirements can be waived by WCG, office, or custodian if possible.

The advisory services offered by WCG Wealth Advisors, LLC are available for individuals, high net worth individuals, individual retirement accounts ("IRAs"), banks and thrift institutions, pension, and profit-sharing plans, including plans subject to Employee Retirement Income Security Act of 1974 ("ERISA"), trusts, estates, charitable organizations, state and municipal government entities, corporations and other business entities. WCG is currently not working with other types of clients or pursuing them as prospects but would not turn away any opportunities that may arise.

If a client's account is a pension or other employee benefit plan governed by ERISA, WCG can be a 3(21) or 3(38) fiduciary to the plan. In providing our investment advisory services, the sole standard of care imposed upon us is to act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims.

We will provide certain required disclosures to the "Responsible Plan Fiduciary" (as such term is defined in ERISA) in accordance with Section 408(b)(2), regarding the services we provide and the direct and indirect compensation we receive from such clients. Generally, these disclosures are contained in this Brochure or the RCPA and are designed to enable the ERISA plan's fiduciary to: (1) determine the reasonableness of all compensation received by us; (2) identify any potential conflicts of interest; and (3) satisfy reporting and disclosure requirements to plan participants.

However, WCG generally provides investment advice to individuals and high-net-worth individuals as well as corporate clients. WCG is currently not working with other types of clients or pursuing them as prospects but would not turn away any opportunities that may arise.

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

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange-traded funds (“ETFs”), options, mutual funds, and other public and private securities or investments.

The client’s individual investment strategy is tailored to their specific needs and may include some or all the previously mentioned securities. Each portfolio will be initially designed to meet an investment goal, which we determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based on the client’s individual needs, stated goals, and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

WCG uses a combination of fundamental, technical, and macroeconomic analysis to formulate investment advice when managing assets. In some WCG models, WCG conducts quantitative analysis on styles or factors (trend, momentum, value, quality, volatility) and may use selection filters or strategies to invest in companies adhering to ESG or Gender-focused goals. WCG may implement a strategic, tactical, or strategic/tactical blend strategy based on current market conditions and the objectives and risk tolerance of a client. WCG may use a blend of both passive and active strategies when managing portfolios.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis concentrates on factors that determine a company’s value, revenue, cash flows, leverage, and expected future earnings. This analysis looks at valuation, quality of earnings, and a company’s financial health when investing.

The risk assumed is that this analysis doesn’t consider market moves that are not captured by fundamentals alone.

Technical analysis involves the observation of price behavior, both at the company and aggregated index levels. Technical analysis seeks to identify short-, intermediate- and long-term trends as well as the relative strength or momentum of trends. Technical analysis also seeks to identify securities that may follow discernible patterns that would be attractive to investors.

The risk to this analysis is that stocks, indices, or other securities/financial instruments do not always follow known patterns or stay within a current trend.

Macroeconomic analysis involves secular and cyclical analyses and seeks to understand investment implications by evaluating levels of and changes to currencies, consumer behavior, the labor market, outside economies, debt expansions and contractions, industries and sectors, and trade.

The risks with this analysis is that any forecast of macroeconomic changes and the timing of those changes may not always coincide with investments that would perform favorably in those environments.

Quantitative analysis of factors and styles involves looking at statistical measures that categorize certain investments based on how they have behaved historically.

The risk to this analysis is that investments may change how they have historically behaved or that markets don’t reward attractive risk premiums as they historically have.

Depending on the analysis, WCG will implement a long- or short-term trading strategy based on the objectives and risk tolerance of a client.

Please note, investing in securities involves risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that the future performance of any specific investment or investment strategy will be profitable or equal to any specific performance level(s). Past performance is not indicative of future results.

WCG's methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations such as:

- **Market Risk:** the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- **Interest Rate Risk:** the risk that fixed-income securities will decline in value because of an increase in interest rates; a bond or a fixed-income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Credit Risk:** the risk that an investor could lose money as a result of the market impact of a credit event, usually related to credit spreads widening, a downgrade in credit quality or a default in the issue.
- **Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned below).
- **Equity:** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions, and the general economic environments.
- **Fixed income:** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt, and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed-income security. In general, the fixed-income market is volatile, and fixed-income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities. Fixed-income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation-protected/inflation-linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed-income securities also include the general risk of non-U.S. investing described below.
- **Non-U.S. Securities:** present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting, and the lesser degree of accurate public information available.
- **Exchange Traded Funds ("ETFs"):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock-holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

- Leveraged and Inverse ETFs, ETNs, and Mutual Funds. Leveraged ETFs, ETNs, and mutual funds, sometimes labeled “ultra” or “2x” for example, are designed to provide a multiple of the underlying index's return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs, ETNs, and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to as a tracking error. Continual re-setting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and are generally not appropriate as an intermediate or long-term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts, and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax-efficient than more traditional ETFs, ETNs, and mutual funds.
- Annuities: are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do. If a client purchases a variable annuity that is part of a Program, the client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Clients should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts. Some products may charge a recapture or redemption fee for contracts or benefits not held for a specified period of time or that do not follow stated withdrawal terms.
- Alternative Investment Risk: There are a number of different risks involved with alternative investments, including some or all of those listed below. The risks vary depending on the type of alternative investment, with the main risks generally being illiquidity, higher and multi-layered fee structures, complex investments, less transparency, tax issues; and lack of diversification of investment. Management Risk: the strategies utilized by WCG, as well as portfolio managers of mutual funds and ETFs, can or will not be successful in some market conditions; Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. Generally, business risk is that a company will go bankrupt or perform below expectations. Every company carries the business risk that it will produce insufficient cash flow in order to maintain operations. Business risk can come from a variety of sources, some systemic and others un-systemic. That is, every company has the business risk that the broader economy will perform poorly and therefore that sales will be poor, and also the risk that the market simply will not like its products; Market Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if there is an active market for the asset. For example, Treasury Bills are highly liquid, while real estate properties are not. The value of securities held in client accounts that are traded on exchanges and the risks associated with holding these positions vary in response to events that affect asset markets in general. Market disruptions such as those that occurred in 1987, in September 2001, and the "Flash Crash" in May 2010 (the biggest one-day point decline, 998.5 points, on an intraday basis in Dow Jones Industrial average history) could lead



to violent price swings in securities held within client portfolios and could result in substantial losses;

- **Extraordinary Events:** global terrorist activity and United States involvement in armed conflict can negatively affect general economic prospects, including sales, profits, and production, and can lead to depressed securities prices and problems relating to infrastructure and trading facilities; **Potential Concentration:** Client portfolios can have highly concentrated positions in issuers engaged in one or a few industries. This increases the risk of loss relative to the market as a whole; **Tax Risk:** WCG in some cases can or will not manage client accounts with tax consequences in mind. Some strategies, including transactions in options and futures contracts, can be subject to special tax rules, which can have adverse consequences for the account holder; **Counterparty Risk:** the risk that the other party in a transaction will not fulfill its contractual obligations; **Leverage Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations can result in bankruptcy and/or a declining market value;
- **Margin Account Risk:** Clients should be aware that margin borrowing involves additional risks. Margin borrowing will result in an increased gain if the value of the securities in the account goes up but will result in increased losses if the value of the securities in the account goes down. The Advisor acting as the client's creditor will have the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact performance reports.
- **Option Trading Risk:** Clients should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and a Program account will no longer hold the security. When purchasing options there is the risk that the entire premium paid (the purchase price) for the option can be lost if the option is not exercised or otherwise sold prior to the option's expiration date. When selling (or "writing") options, the risk of loss can be much greater if the options are written uncovered ("naked"). The risk of loss can far exceed the amount of the premium received for an uncovered option and in the case of an uncovered call option, the potential loss is unlimited.
- **Alternative Strategy Mutual Funds:** Certain mutual funds available in the Programs invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be appropriate for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes, and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry. These types of funds tend to have higher expense ratios than more traditional mutual funds. They also tend to be newer and have less of a track record or performance history. **Closed-End/Interval Funds:** Clients should be aware that closed-end funds available within the Programs may not give investors the right to redeem their shares, and a secondary market may not exist. Therefore, clients may be unable to liquidate all or a portion of their shares in these types of funds. While the fund may from time to time offer to repurchase shares, it is not obligated to do so (unless it has been structured as an "interval fund"). In the case of interval funds, the fund will provide limited liquidity to shareholders by offering to repurchase a limited amount of shares on a periodic basis, but there is no guarantee that clients will be able to sell all the shares in any particular repurchase offer. In some cases, there may be an additional cost to investors who redeem before holding shares for a specified amount of time. The repurchase offer program may be suspended under certain circumstances.



WCG Financial Advisors may allocate client investable assets within one or more of the following proprietary investment strategies:

#### Quant Stock

- The Strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active strategies focus on individual equities and may include ETFs and mutual funds.

#### Quant Stock Gender

- The Strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active strategies focus on individual equities and may include ETFs and mutual funds. These models are also screened for gender lens factors and social responsibility, corporate governance, and environmental factors.

#### Quant Stock Select

- The strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active strategies focus on individual equities and may include ETFs and mutual funds. These models are also screened for social responsibility, corporate governance, and environmental factors.

#### Quant Stock Plus

- The Strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active strategies focus on individual equities and may include ETFs and mutual funds. These models may also include liquid and semi-liquid alternatives strategies in an interval mutual fund structure.

#### Tactical

- The strategic objective is to participate with the market during normal environments and tactically reduce risk during volatile environments. The strategy employs four signals for two asset classes that will signal to raise cash when appropriate. The equities in the models are diversified across all market capitalizations and styles.

#### Tactical WLS

- The strategic objective is to participate with the market during normal environments and tactically reduce risk during volatile environments. The strategy employs four signals for two asset classes that will signal to raise cash when appropriate. The equities in the models are only diversified via the S&P 500.

#### Tactical High Yield

- The strategic objective is to participate in the high yield market during normal environments and to tactically reduce risk during volatile environments. The strategy employs a trend following signal and will shift to cash when appropriate. The model will only hold high yield bond ETFs or ultra-short fixed income and cash-like ETFs.

#### ETF Stock

- The strategic objective is long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active and passive strategies including individual stocks, mutual funds, and ETFs are utilized for this portfolio.

#### ETF Stock Income

- The strategic objective is long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active and passive strategies including individual stocks, mutual funds, and ETFs are utilized

for this portfolio. This model focuses primarily on equity income and interest income.

#### ETF Stock Plus

- The strategic objective is long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Active and passive strategies including individual stocks, mutual funds, and ETFs are utilized for this portfolio. These models may also include liquid and semi-liquid alternatives strategies in an interval mutual fund structure.

#### Tortoise

- This is an aggressive growth model that focuses on large stocks that are believed to be undervalued and have a competitive advantage compared to other stocks.

#### Hare

- This is an aggressive growth model that focuses on large stocks that are experienced strong growth and are believed to be reasonably priced.

#### Dividend Select

- This is an aggressive growth model that focuses on large stocks that are paying an above average dividend yield and are believed to be reasonably priced.

#### ETF

- The Strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. These models blend low-cost passive ETFs with actively managed ETFs. When appropriate, mutual funds may also be used.

#### ETF Plus

- The Strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. These models blend low-cost passive ETFs with actively managed ETFs. When appropriate, mutual funds may also be used. These models may also include liquid and semi-liquid alternatives strategies in an interval mutual fund structure.

#### ETF Select

- The strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. These models blend low-cost passive ETFs with actively managed ETFs. When appropriate, mutual funds may also be used. The funds in the model may also be screened for social responsibility, corporate governance, and environmental factors.

#### High Impact Portfolios (HIP)

- The strategic objective is a long-term focus on performance through full market cycles seeking competitive risk-adjusted returns. Actively managed mutual funds that are involved at the company level in proxy voting, engagement, and high-impact initiatives may be used in these models. The primary goal of these models is adherence to ESG standards. We may also hold individual stocks and ETFs that are screened for social responsibility, corporate governance, and environmental factors.

## Item 9: Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity of a firm's management.

Any such disciplinary information for WCG and their Investment Advisor Representatives would be provided herein and publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>.

There are no legal or disciplinary events to disclose.

## Item 10: Other Financial Industry Activities and Affiliations

Investment Adviser Representatives may also be Registered Representatives of LPL Financial, an unaffiliated SEC registered and FINRA/SIPC member broker/dealer. Clients may choose to engage a registered investment adviser in their capacity as a Registered Representative of the unaffiliated LPL Financial broker/dealer, to implement investment recommendations on a commission basis. Please refer to Item 12 for a discussion of the benefits the Adviser may receive from LPL Financial and the conflicts of interest associated with receipt of such benefits.

Representatives of our firm may also be insurance agents/brokers. They may offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest arises as these insurance sales create an incentive to recommend products based on what the compensation advisor and/or our supervised persons may earn and may not necessarily be in the best interests of the client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer.

Neither WCG Wealth Advisors, LLC nor any of the management persons are registered or have a registration pending to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

IARs are permitted to engage in certain approved activities other than the provision of advisory services through WCG, and in certain cases, an IAR could receive greater compensation through the outside business than through WCG. For example, an IAR could also be an accountant, real estate agent, tax preparer, or lawyer. To the extent that these IARs provide such services all such services shall be performed by those IARs in their individual professional capacities, independent of WCG, for which services WCG shall not receive any portion of the fees charged by the IAR (referral or otherwise). It is expected that these IARs, solely incidental to their activities, may recommend WCG's services to certain of their clients. No client of WCG is under any obligation to use the services of these IARs. The Chief Compliance Officer remains available to address any questions that a client or prospective client may have regarding the above conflict of interest and if you engage with an IAR for services separate from WCG, you may wish to discuss with him or her any questions you have about the compensation he or she receives from the engagement.

WCG Wealth Advisors, LLC may recommend and select independent, third-party money managers in addition to the third-party managers offered through LPL Financial to manage all or a portion of a client's account. It should be noted that the total fees incurred by clients when utilizing third-party managers will include both management fees payable to the third-party managers for their services as well as the fees payable to WCG Wealth Advisors, LLC for their investment advisory services.

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

WCG Wealth Advisors, LLC maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty, and trust.

The Code of Ethics includes guidelines regarding personal securities transactions of its employees and Investment Adviser Representatives. WCG's Code of Ethics permits employees and Investment Adviser Representatives or related persons to invest for their own personal accounts in the same or different securities that an IAR may purchase for clients in program accounts.

This presents a potential conflict of interest because trading by an employee or an IAR in their personal securities account in the same or different security on or about the same time as trading by a client could potentially disadvantage the client. WCG Wealth Advisors, LLC addresses this conflict of interest by requiring in its Code of Ethics that employees and IARs report certain personal securities transactions and holdings to the Chief Compliance Officer for review.

An Investment Adviser Representative is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients always. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We always require all our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgment that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

WCG and its associated persons may buy or sell securities at the same time and in the same securities as Clients. Which can create a conflict of interest. In order to mitigate conflicts of interest, such as frontrunning, no less than quarterly, personal holdings are reviewed of its affiliated persons. These reviews ensure that the personal trading of affiliated persons does not disadvantage Clients of WCG.

Neither WCG Wealth Advisors, LLC nor a related person recommends to clients or buys or sells for client accounts, or securities in which you or a related person has a material financial interest.

## Item 12: Brokerage Practices

We recommend the brokerage and custodial services of LPL Financial LLC, Charles Schwab & Co., Inc., or Fidelity Brokerage Services, LLC. (whether one or more "Custodians"). Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.

- Availability of investment research and tools.
- The overall quality of services.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

#### Research and Other Soft Dollar Benefits

In selecting or recommending a broker-dealer, we will consider the value of research and additional brokerage products and services a broker-dealer has provided or will provide to our clients and our firm. Receipt of these additional brokerage products and services are considered to have been paid for with "soft dollars." Because such services could be considered to provide a benefit to our firm, we have a conflict of interest in directing your brokerage business. We could receive benefits by selecting a particular broker-dealer to execute your transactions, and the transaction compensation charged by that broker-dealer might not be the lowest compensation we might otherwise be able to negotiate.

Products and services that we may receive from broker-dealers may consist of research data and analyses, financial publications, recommendations, or other information about particular companies and industries (through research reports and otherwise), and other products or services (e.g., software and databases) that provide lawful and appropriate assistance to our firm in the performance of our investment decision-making responsibilities. Consistent with applicable rules, brokerage products, and services consist primarily of computer services and software that permit our firm to effect securities transactions and perform functions incidental to transaction execution. We use such products and services in our general investment decision-making, not just for those accounts for which commissions may be considered to have been used to pay for the products or services.

The test for determining whether a service, product, or benefit obtained from or at the expense of a broker constitutes "research" under this definition is whether the service, product, or benefit assists our firm in investment decision-making for discretionary client accounts. Services, products, or benefits that do not assist in investment decision-making for discretionary client accounts do not qualify as "research." Also, services, products, or benefits that are used in part for investment decision-making for discretionary client accounts and in part for other purposes (such as accounting, corporate administration, recordkeeping, performance attribution analysis, client reporting, or investment decision-making for WCG's own investment accounts) constitute "research" only to the extent that they are used in investment decision-making for discretionary client accounts.

Before placing orders with a particular broker-dealer, we determine that the commissions to be paid are reasonable in relation to the value of all the brokerage and research products and services provided by that broker-dealer. In some cases, the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts charged by another broker-dealer that did not provide research services or products.

We do not exclude a broker-dealer from receiving business simply because the broker-dealer does not provide our firm with soft-dollar research products and services. However, we may not be willing to pay the same commission to such a broker-dealer as we would have paid had the broker-dealer provided such products and services.

The products and services we receive from broker-dealers will generally be used in servicing all of our clients' accounts. Our use of these products and services will not be limited to the accounts that paid commissions to the broker-dealer for such products and services. In addition, we may not allocate soft dollar benefits to your accounts proportionately to the soft dollar credits the accounts generate. As part of our fiduciary duties to you, we always endeavor to put your interests first. You should be aware that the receipt of economic benefits by our firm is

considered to create a conflict of interest.

We have instituted certain procedures governing soft dollar relationships including preparation of a brokerage allocation budget, mandated reporting of soft dollar irregularities, an annual evaluation of soft dollar relationships, and an annual review of our brochure to ensure adequate disclosures of conflicts of interest regarding our soft dollar relationships.

#### Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian and/or other brokerage firms. These products are in addition to any benefits or research we pay for with soft dollars, and may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of 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, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

#### LPL Financial

WCG receives support services and/or products from LPL Financial, many of which assist the Advisor to better monitor and service program accounts maintained at LPL Financial; however, some of the services and products benefit Advisor and not client accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- Investment-related research
- Pricing information and market data
- Software and other technology that provide access to client account data
- Compliance and/or practice management-related publications
- Consulting services
- Attendance at conferences, meetings, and other educational and/or social events
- Marketing support
- Computer hardware and/or software
- Other products and services used by Advisor in furtherance of its investment advisory business operations

LPL may pay for some or all of third-party support services fees if provided by a third-party. These support services are provided to Advisor based on the overall relationship between Advisor and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involves the execution of client transactions as a condition to the receipt of services. Advisor will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Advisor to LPL or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. However, because Advisor receives these benefits from LPL Financial, there is a potential conflict of interest. The receipt of these products and services presents a financial incentive for Advisor to recommend that its clients use LPL Financial's custodial platform rather than another custodian's platform.

## LPL Financial Transition Assistance Benefits

LPL Financial provides various benefits and payments to Dually Registered Persons that are new to the LPL Financial platform to assist the representative with the costs (including foregone revenues during account transition) associated with transitioning his or her business to the LPL Financial platform (collectively referred to as "Transition Assistance"). The proceeds of such Transition Assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, providing working capital to assist in funding the Dually Registered Person's business, satisfying any outstanding debt owed to the Dually Registered Person's prior firm, offsetting account transfer fees (ACATs) payable to LPL Financial as a result of the Dually Registered Person's clients transitioning to LPL Financial's custodial platform, technology set-up fees, marketing and mailing costs, stationary and licensure transfer fees, moving expenses, office space expenses, staffing support, and termination fees associated with moving accounts. The amount of the Transition Assistance payments are often significant in relation to the overall revenue earned or compensation received by the Dually Registered Person at [his/her] prior firm. Such payments are generally based on the size of the Dually Registered Person's business established at [his/her] prior firm and/or assets under custody on the LPL Financial. Please refer to the relevant Part 2B brochure supplement for more information about the specific Transition Payments your representative receives.

Transition Assistance payments and other benefits are provided to associated persons of WCG in their capacity as registered representatives of LPL Financial. However, the receipt of Transition Assistance by such Dually Registered Persons creates conflicts of interest relating to WCG's advisory business because it creates a financial incentive for WCG's representatives to recommend that its clients maintain their accounts with LPL Financial. In certain instances, the receipt of such benefits is dependent on a Dually Registered Person maintaining its clients' assets with LPL Financial, and therefore WCG has an incentive to recommend that clients maintain their account with LPL Financial in order to generate such benefits.

WCG attempts to mitigate these conflicts of interest by evaluating and recommending that clients use LPL Financial's services based on the benefits that such services provide to our clients, rather than the Transition Assistance earned by any particular Dually Registered Person. WCG considers LPL Financial' based on the quality and pricing of the execution, benefits of an integrated platform for brokerage and advisory accounts, and other services provided by LPL Financial.

Net improvement price, and quality of service when recommending or requiring that clients maintain accounts with LPL Financial. However, clients should be aware of this conflict and take it into consideration in making a decision whether to custody their assets in a brokerage account at LPL Financial.

### Oversight Fees for Assets Held Away from LPL

As stated previously, individuals associated with WCG are licensed as registered representatives of LPL Financial. As a result of this licensing relationship, LPL Financial is responsible for supervising certain activities of WCG to the extent WCG manages assets at a broker/dealer and custodian other than LPL Financial. LPL Financial charges a fee for this oversight. This presents a conflict of interest in that WCG has a financial incentive to recommend that you maintain your account with LPL Financial rather than another custodian in order to avoid the oversight fee. However, to the extent WCG recommends you use LPL Financial for such services, it is because WCG believes that it is in your best interest to do so based on the quality and pricing of the execution, benefits of an integrated platform for brokerage and advisory accounts, and other services provided by LPL Financial. As discussed previously, certain associated persons of the advisor are registered representatives of LPL Financial.

As a result of this relationship, LPL Financial may have access to certain confidential information (e.g., financial information, investment objectives, transactions, and holdings) about Advisor's clients, even if the client does not

establish any account through LPL. If you would like a copy of the LPL Financial Privacy policy, please contact your IAR.

#### Schwab- Your Custody and Brokerage Costs

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. In addition to commission rates, Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commission or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

#### Schwab Advisor Services

Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like ours. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting, and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us.

#### Services that Benefit You

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

#### Services that May Not Directly Benefit You

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements).
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts.
- Provide pricing and other market data; facilitates payment of our fees from our clients' accounts; and
- Assist with back-office functions, recordkeeping, and client reporting.

#### Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events.



- Technology, compliance, legal, and business consulting.
- Publications and conferences on practice management and business succession.
- Access to employee benefits providers, human capital consultants, and insurance providers.
- Discount of up to \$4,250 on PortfolioCenter® Reporting Software.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third-party's fees. Schwab may also provide us with other benefits such as occasional business entertainment for our personnel.

#### Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. These services may give us an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of Schwab's services (based on the factors discussed above – see "The Custodian and Broker We Use") and not Schwab's services that benefit only us. We do not believe that maintaining our client's assets at Schwab for services presents a material conflict of interest.

#### Fidelity Brokerage Services, LLC

WCG has an arrangement with Fidelity Brokerage Services, LLC (together with all affiliates, "Fidelity") through which Fidelity provides Adviser with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping, and related services that are intended to support firms like WCG in conducting business and in serving the best interests of their clients. Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds and commissions are charged for individual equity and debt securities transactions). Fidelity enables WCG to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers. As part of the arrangement, Fidelity also makes available to WCG, at no additional charge, certain research, and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by WCG (within specified parameters).

These research and brokerage services include:

- Provide access to client account data (such as trade confirmations and account statements).
- Facilitate trade execution and allocate bundled trade orders for multiple client accounts).
- Provide research, pricing, and other market data.
- Facilitate payment of WCG's fees from its clients' accounts.
- Assist with back-office functions, recordkeeping, and client reporting.
- Compliance, legal and business consulting; and
- Publications, and conferences on practice management and business succession.

As a result of receiving such services for no additional cost, WCG may have an incentive to continue to use or expand the use of Fidelity's services. WCG examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of its clients and satisfies its client obligations, including its duty to seek the best execution. WCG and Fidelity are not affiliated, nor is there any broker-dealer affiliation between WCG and Fidelity. Brokerage for Client Referrals.

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

#### Directed Brokerage

#### Block Trades

In some cases, we do not combine multiple orders for shares of the same securities purchased for advisory accounts we manage (the practice of combining multiple orders for shares of the same securities is commonly referred to as "block trading"). Accordingly, you may pay different prices for the same securities transactions than other clients pay. Furthermore, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than other clients.

#### Trading Error

In the event a trading error occurs in your account, our policy is to restore your 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.

#### Mutual Fund Share Classes

Mutual funds are sold with different share classes, which carry different cost structures. Each available share class is described in the mutual fund's prospectus. When we purchase, or recommend the purchase of, mutual funds for a client, we select the share class that is deemed to be in the client's best interest, taking into consideration cost, tax implications, and other factors. When the fund is available for purchase at net asset value, we will purchase, or recommend the purchase of, the fund at net asset value. We also review the mutual funds held in accounts that come under our management to determine whether a more beneficial share class is available, considering cost, tax implications, and the impact of contingent deferred sales charges.

### Item 13: Review of Accounts

For those clients to whom WCG provides investment advisory services, account reviews are conducted at least annually by its IARs. All investment advisory clients are advised that it remains their responsibility to advise their IAR of any changes in his/her/its financial situation, investment objectives, and/or risk tolerance. All clients (in person, via virtual meeting, or by telephone) are encouraged to discuss and review all such changes with their IAR on an annual basis. Clients who do not respond to requests to meet will be sent a communication via mail or email to help them understand their current financial position and assist their IAR in the continued management of the account(s).

IARs can or will conduct account reviews on an other-than-periodic basis upon the occurrence of a triggering event, such as a change in a client's financial situation, investment objectives, risk tolerance, market corrections, and client request.

As mentioned previously, WCG has a dedicated Financial Planning department ("ARC") that generates financial plans based on the client's goals and objectives that have been discussed with the WCG Financial Advisor. ARC or financial planners on WCG financial advisor teams prepare the financial plans with review by ARC/ WCG Financial Advisor before the presentation of the plan to the client.

Financial planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with their IAR. WCG does not provide ongoing services to Comprehensive Financial Planning or Hourly Consulting clients unless they separately contract with WCG for a post-financial plan meeting or an update to their initial written financial plan.

Retirement Plan Consulting clients receive reviews of their pension plans for the duration of the pension consulting service. IARs also provide ongoing services to pension consulting clients where we meet with such clients upon their request to discuss changes to their circumstances and resulting updates to their plans.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. WCG Wealth Advisors, LLC may also provide a written periodic report summarizing account activity and performance.

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

WCG Wealth Advisors, LLC receives an economic benefit from LPL Financial in reimbursement for marketing-related expenses. Please see the detailed discussion of the categories of marketing-related expenses and potential conflicts of interest in Item 12 Brokerage Practices.

WCG Wealth Advisors, LLC, and employees receive additional compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with their IAR, client workshops or events, marketing events, or advertising initiatives, including services for identifying prospective clients. Product sponsors may also pay for, or reimburse WCG Wealth Advisors, LLC for the costs associated with, education or training events that may be attended by WCG Wealth Advisors, LLC employees, and IARs, and for WCG Wealth Advisors, LLC sponsored conferences and events. WCG Wealth Advisors, LLC has agreements in place to pay solicitors a portion of advisory fees. WCG Wealth Advisors, LLC does not directly or indirectly compensate any person who is not a supervised person for client referrals.

WCG Insurance, LLC (an affiliated entity) is a licensed insurance agency, and in such capacity may offer for sale, insurance-related products on a commission basis, including the sale of such products to investment advisory clients of WCG. WCG Financial Advisors providing advice may be licensed insurance agents. Normal commissions from insurance products are earned and paid by insurance companies to WCG Financial Advisors when such products are placed directly with their clients. Insurance products offered through various insurance vendors are often recommended to clients of WCG to minimize clients' exposure to identified risks. Although clients are under no obligation to purchase insurance products or utilize the companies recommended by WCG, clients often do purchase such products when the needs arise. For clients of WCG who do purchase such products, causing commissions or recurring revenue to be generated, such commissions or recurring revenue are paid to the WCG Financial Advisors.

There are no other economic benefits provided by someone who is not a client for providing investment advice.

WCG Wealth Advisors, LLC may receive referral fees from other third-party managers when we refer clients. Thus, we have a conflict of interest in our decision to recommend a third-party manager that pays WCG Wealth Advisors, LLC a referral fee. At all times, WCG Wealth Advisors, LLC will act in the best interest of the client when recommending a third-party manager.

When a client is referred to a third-party manager by us, we will provide the client with a copy of the third-party managers Form ADV Part 2 Disclosure Brochure, if WCG is an unaffiliated registered investment adviser firm, as required by the Investment Advisers Act of 1940.

The referral agreements between WCG Wealth Advisors, LLC, and any third-party manager we refer a client to will not result in any charges to clients in addition to the normal level of advisory fees charged.

#### LPL Financial

WCG and/or its Dually Registered Persons are incented to join and remain affiliated with LPL Financial and to recommend that clients establish accounts with LPL Financial through the provision of Transition Assistance (discussed in Item 12 above). LPL also provides other compensation to WCG and its Dually Registered Persons, including but not limited to, bonus payments, repayable and forgivable loans, stock awards, and other benefits. The receipt of any such compensation creates a financial incentive for your representative to recommend LPL Financial as custodian for the assets in your advisory account. We encourage you to discuss any such conflicts of interest with your representative before making a decision to the custody of your assets at LPL Financial.

The Advisor receives asset-based advisory fees as a result of its clients' participation in the LPL-sponsored programs. The amount of these fees can be more or less than what WCG would receive if a client participated in other LPL programs or paid separately for investment advice, brokerage, and other client services. Additionally, WCG or one or more of its IARs will receive all or a portion of certain third-party fees that are paid by program clients. Therefore, WCG has a financial incentive when recommending that its clients open an account under the LPL- managed account program. As part of WCG's fiduciary duty to its clients, WCG and its IARs will endeavor at all times to put the interest of the clients first and will only make recommendations when they are reasonably believed to be in the best interests of the client. Please refer to Item 5 of this Brochure for further details regarding fees.

#### Charles Schwab & Co., Inc.- Institutional

In addition, WCG receives an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisers whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). The availability to WCG of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

As disclosed under the Fees and Compensation section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the Fees and Compensation section.

WCG does not receive any compensation from any third-party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Refer to the Brokerage Practices section above for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

## Item 15: Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. WCG Wealth Advisors, LLC does not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodians. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

WCG Wealth Advisors, LLC urges you to carefully review the statements provided by the custodian and compare such official custodial records to the account statements that may be provided by WCG Wealth Advisors, LLC.

## Item 16: Investment Discretion

The client can determine to engage WCG Wealth Advisors, LLC to provide investment advisory services on a discretionary basis. Prior to WCG Wealth Advisors, LLC assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming WCG Wealth Advisors, LLC as the client's attorney and agent in fact, granting WCG Wealth Advisors, LLC full authority to buy, sell, or otherwise affect investment transactions involving the assets in the client's name found in the discretionary account.

Accounts that utilize third-party money managers may be managed on a discretionary or non-discretionary basis. For non-discretionary accounts, WCG Wealth Advisors, LLC will discuss the investments to be purchased or sold for the client's account(s) and will obtain client approval before any changes are made while staying within the parameter of the Investment Policy Statement mutually agreed upon by the client and WCG Wealth Advisors, LLC.

## Item 17: Voting Client Securities

WCG Wealth Advisors, LLC does not vote for client proxies, however, third-party money managers selected or recommended by our firm may vote proxies for clients. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact WCG Wealth Advisors.

WCG does not take any action or render any advice concerning any securities held in any accounts that are named in or subject to class action lawsuits or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries because of actions, misconduct, or negligence by issuers of securities held by you. We do, however, forward to clients any information that we receive regarding class action legal matters involving any security held in client accounts.

## Item 18: Financial Information

WCG Wealth Advisors, LLC does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

There are no financial conditions that are reasonably likely to impair WCG's ability to meet contractual commitments to clients.

At no time has WCG Wealth Advisors, LLC been the subject of a bankruptcy petition.