Item 1: Cover Page

Wrap Fee Program Brochure

WCG Wrap Fee Brochure ADV Part 2A

Registered As: WCG Wealth Advisors, LLC

Doing Business As: The Wealth Consulting Group

Registered Investment Adviser
8925 West Post Road Suite 200 | Las Vegas, Nevada 89148
(702) 263-1919 – phone
(702) 977-7750 – Fax

March 31, 2023

This wrap fee program brochure provides information about the qualifications and business practices of WCG Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact WCG Wealth Advisors, LLC at (702) 263-1919 or sodendahl@wealthcg.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration does not imply a certain level of skill or training.

Additional information about WCG Wealth Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

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 an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since our last Brochure dated March 31, 2022, we have had several material changes to our Firm Brochure.

- Item 4 “Services, Fees and Compensation” is updated to reflect more information on our fees and services and the addition of Fidelity Brokerage Services, LLC as a custodian.
- Item 6 “Account Requirements and Client Types” is updated to reflect the minimum account requirements.
- Item 7 “Portfolio Manager Selection and Evaluation” is updated to reflect our assets under management as of December 31, 2022, and our minimum account requirements.
- Item 11 “Additional Information” is updated to reflect more information regarding the “Review of Accounts”, “Other Compensation”, “Custody” and “Brokerage Practices” sub-sections.

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 compliance@wealthcg.com.

Additional information about WCG Wealth Advisors, LLC is also available via the SEC’s website 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: Services, Fees, and Compensation

Services

WCG Wealth Advisors, LLC ("Advisor" and "WCG") d/b/a The Wealth Consulting Group offers asset management services based on the individual needs of the client. This Brochure describes the advisory services offered under WCG Wrap Accounts. For more information about Advisor's other investment advisory services, please contact Advisor for a copy of a similar brochure that describes such services or go to www.adviserinfo.sec.gov.

In WCG Wrap Accounts, Advisor provides ongoing investment advice and management of assets in the client's account. Advisor provides advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, equities, and fixed-income securities. Advisor provides advice that is tailored to the individual needs of the client based on the investment objective chosen by the client. Clients may impose restrictions on investing in certain securities or groups of securities by indicating in the written advisory agreement with Advisor.

Advisor provides management services on a discretionary or non-discretionary basis. The client may authorize the Advisor to have discretion on the advisory agreement. All accounts are managed by the Investment Adviser Representative ("IAR") according to the Investment objective for the accounts. Advisor provides ongoing supervision over the IAR managing an account.

The IAR may delegate portfolio management responsibilities to the Advisor using one of the Advisor's model portfolios. This sub-advisor is a separate offering consisting of portfolio design, investment consulting, trade execution, and portfolio rebalancing services. The sub-advisor utilizes the account custodian and services are provided through WCG through a separate written agreement. IARs of Advisor 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.

Assets for program accounts are held at LPL Financial ("LPL"), Charles Schwab & Co., Inc. TD Ameritrade, Inc., and Fidelity Brokerage Services, LLC as custodian(s). Accounts that are managed by a third party may be custodied by a separate custodian.

Fees

In WCG Wrap Accounts, clients pay Advisor a single annual advisory fee for advisory services and execution of transactions. Clients do not pay brokerage commissions, markups, or transaction charges for the execution of transactions in addition to the advisory fee. The advisory fee is negotiable between the client and the Advisor and is set out in the advisory agreement. The advisory fee is a percentage based on the value of all assets in the account, including cash holdings. Advisory fees charged by the Advisor range from 0.25%to 2.50%. **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. Fees may also be waived for employees or relatives of the advisor.** The advisory fee may be higher than the fee charged by other investment advisers for similar services. The advisory fee is paid to Advisor and is shared between Advisor and its associated persons. Advisor does not accept performance-based fees for program accounts.

WCG's Advisory fees are generally fixed/flat fees. The firm has two advisors who utilize a tiered fee schedule with a reduced percentage rate based on reaching certain thresholds as follows: 1) \$0-\$1,000,000 1.50%, \$1,000,000 - \$2,000,000 1.25%, \$2,000,000 - \$5,000,000 1.%, \$5,000,000 and above .85% and 2) \$0-\$1,000,000 1.4%,

$1,000,000-$2,000,000 1.25%, and $2,000,000 and above 1.%. It is important to note that the fees charged to clients can 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 Financial's billing system, or through a third-party billing system. 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 the third-party system, the fee is calculated the same way except based on 365 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 fee is deducted from the account by the custodian of the assets based on a written authorization from the client. The custodian calculates and deducts the advisory fee quarterly in advance, in most cases. If the advisory agreement is terminated before the end of the quarterly period, the client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

Generally, advisory fees assessed by the firm 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-l 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 sponsor's or manager's Form ADV.

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 is described in additional detail below.

LPL Financial ("LPL") SWM II Platform:

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. The Firm and/or the IAR has the option to negotiate with the custodian for a flat basis point or flat fee to cover all of 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. Transaction fees vary by broker and/or custodian and can vary by IAR. Please ask your IAR for details on transaction fees and/or commissions specific to your account.

The appropriateness of a WRAP account/ SWM II can depend on several 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 a SWM II account, clients should be aware that 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 SWM II 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 a SWM II 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 the firm does not 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.

As noted above, 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.

Other Types of Fees and Charges

Program accounts will incur additional fees and charges from parties other than the Advisor as noted below. These fees and charges are in addition to the advisory fee paid to Advisor. Advisor does not share in any portion of these third-party fees.

LPL Financial, as the broker-dealer providing brokerage and execution services on program accounts, and various custodians will impose certain fees and charges. LPL notifies clients of these charges at account opening and makes available a list of these fees and charges on its website at www.lpl.com. The custodian that holds the account will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay Advisor the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using the management services of an Advisor and by making their own investment decisions.

- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees, and charges for frequent trading. These charges may apply if the client transfers into or purchases such a fund with the applicable charges in a program account.

Although only no-load and load-waived mutual funds can be purchased in a program account, as noted previously, the client should understand that some mutual funds pay asset-based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.

- If a client holds a variable annuity as part of an account, there are mortality, expense, and administrative charges, fees for additional riders on the contract, and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor.

Further information regarding fees assessed by a mutual fund, or variable annuity is available in the appropriate prospectus, which is available upon request from the Advisor or from the product sponsor directly.

Other Important Considerations

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions, and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or the number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.

- The advisory fee also may cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy-and-hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.

- The Advisor recommending the program to the client receives compensation as a result of the client's participation in the program. This compensation includes the advisory fee and also may include other compensation, such as bonuses, awards, or other things of value offered by LPL Financial to the Advisor or its associated persons. The amount of this compensation may be more or less than what the Advisor would receive if the client participated in other LPL Financial programs, and programs of other investment advisors or paid separately for investment advice, brokerage, and other client services. Therefore, the Advisor may have a financial incentive to recommend a program account over other programs and services.

- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers, or other investment firms not affiliated with Advisor.

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.

TD Ameritrade Institutional

We participate in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer, and a FINRA member. TD Ameritrade offers independent investment advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. We receive some benefits from TD Ameritrade through our participation in the Program. As disclosed above, we participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to you for custody and brokerage services. There is no direct link between our participation in the Program and the investment advice we give you, although we receive economic benefits through our participation in the Program that is typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research-related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to your accounts); the ability to have advisory fees deducted directly from your accounts; access to an electronic communications network for order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third-party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit us but may not benefit your accounts. These products or services may assist us in managing and administering your accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to you, we endeavor at all times to put your interests first. You should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services. However, we believe our selection of Fidelity as custodian is in the best interests of our clients and our selection is supported by the scope, quality, and price of Fidelity's services as a whole, not Fidelity's services that only benefit us. We have also determined that having Fidelity execute most trades is consistent with our duty to seek "best execution" of your trades. We periodically conduct an assessment of any service provider we recommend, including Fidelity, which can include a review of their range of services, reasonableness of fees, among other items, in comparison to their industry peers.

Charles Schwab & Co., Inc.- Institutional

In addition, we receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

<u>Services that Benefit You</u>

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.

<u>Services that May Not Directly Benefit You</u>

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 client's 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; facilitate payment of our fees from our clients' accounts; and assist with back-office functions, recordkeeping, and client reporting.

<u>Services that Generally Benefit Only Us</u>

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® 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.

Fidelity Brokerage Services, LLC

WCG has an arrangement with Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides WCG 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.

Item 5: Retirement Plan Services

WCG Wealth Advisors, LLC is focused on providing advisory services to retirement plan sponsors and 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 Wealth Advisors, LLC 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 Wealth Advisors, LLC acknowledges that it is a fiduciary with respect to its exercise of investment decisions over these assets of a retirement plan. WCG Wealth Advisors, LLC 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.

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.

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 but will not exceed 2.5%. Fees are charged in advance at the beginning of each calendar 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 advisors, 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). Descriptions of mutual fund fees and expenses are 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.

Item 6: Account Requirements and Types of Clients

A minimum account value is not generally required for the program. If you are invested in the WCG Model Portfolios, the minimum requirement ranges from $15,000-$200,000 depending on the portfolio you select. The program is available for individuals, high net worth individuals, individual retirement accounts ("IRAs"), banks and thrift institutions, pension, and profit-sharing plans, including plans subject to the Employee Retirement Income Security Act of 1974 ("ERISA"), trusts, estates, charitable organizations, state and municipal government entities, corporations and other business entities. The firm 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 7: Portfolio Manager Selection and Evaluation

WCG Wealth Advisors, LLC through its' Investment Advisor Representatives, is responsible for tailored investment advice and asset management on the purchase and sale of various types of investments, such as:

- mutual funds
- exchange-traded funds ("ETFs")
- variable annuity subaccounts
- equities
- fixed income securities
- Structured products,
- Alternative Investments

Advice is provided to clients based on their individual needs and investment objectives. Clients may impose restrictions on investing in certain securities or groups of securities in the written advisory agreement.

WCG Wealth Advisors, LLC generally requires that Investment Advisor Representatives involved in determining or giving investment advice have several years of experience dealing with individuals and/or small businesses. WCG Wealth Advisors, LLC does not select, review, or recommend partners or portfolio managers not registered with the firm.

There are no differences between how the wrap fee program is managed and how other accounts are managed.

The other non-wrap fee programs provided by the advisor include:

- **Asset Management**

  WCG Wealth Advisors, LLC through its investment advisor 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 Financial to support investment advisory services provided by WCG Wealth Advisors, LLC to our clients. More specific account information and acknowledgments are further detailed on the account application.

  Investment advisor 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, fixed income securities. The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist clients in attempting to meet their financial goals. Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile.

As previously mentioned, a minimum account value is not required for the program unless you are in the WCG Model Portfolios. WCG Model Portfolios range from $15,000-$200,000. Assets managed in a wrap fee account are not managed differently from a non-wrap fee account. However, WCG Wealth Advisors, LLC may charge a higher fee, up to 2.5%, and receive a portion of the wrap fee for services provided.

WCG Wealth Advisors, LLC offers asset management on a discretionary and non-discretionary basis. As of December 31, 2022, the firm had $2,795,714,227 in discretionary assets under management and $89,693 in non-discretionary assets under management for a total of $2,795,803,920 in assets under management.

- **Third-Party Advisory Services**

The Advisor has entered into agreements with various third-party advisors. Under these agreements, the Advisor offers clients various types of programs sponsored by these advisors. All third-party investment advisors to whom the Advisor will refer clients will be licensed as investment advisors by their resident state and any applicable jurisdictions or registered investment advisors with the Securities and Exchange Commission.

After gathering information about a client's financial situation and investment objectives, the Advisor will assist the client in selecting a particular third-party program. The Advisor 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.

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 advisor or a fixed fee. The disclosure document provided by the Advisor will clearly state the fees payable to the Advisor and the impact to the overall fees due to these payments.

Since the compensation the Advisor receives may differ depending on the agreement with each third-party advisor, the Advisor may have an incentive to recommend one third-party advisor over another, if the compensation arrangements are more favorable. Since the independent third-party advisor may pay the fee for the investment advisory services of the Advisor, 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 advisor to whom the Advisor refers its clients, and may or may not be negotiable, as disclosed in the disclosure documents of the third-party advisor.

Clients who are referred to third-party investment advisors 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 advisor's Form ADV 2A or equivalent disclosure document at the same time as the Form ADV 2A or equivalent disclosure document of the Advisor.

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. The Advisor will provide each client with all of the appropriate disclosure statements, including disclosure of solicitation fees to the Advisor and its advisory associates.

- **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 Financial on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Advisor 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 Financial consistent with the client's investment objective. LPL Financial will have the discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL Financial will also have the authority to rebalance the account.

A minimum account value of $10,000 is generally required for OMP.

- **Personal Wealth Portfolios Program (PWP)**

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL Financial. 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 Financial 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)**

MWP offers clients a professionally managed mutual fund asset allocation program. WCG Wealth Advisors, LLC investment advisor 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 Advisor will initiate the steps necessary to open an MWP account and have the discretion to select a model portfolio designed by LPL Financials Research Department consistent with the client's stated investment objective. LPL Financials 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 Financial 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 Financial to effect rebalancing for MWP accounts.

In the future, the MWP program may make available model portfolios designed by strategists other than LPL Financials Research Department. If such models are made available, Advisor will have the discretion to choose among the available models designed by LPL Financial and outside strategists.

A minimum account value of $10,000 – $100,000 is generally required (may be lower) for MWP depending on the portfolio you choose.

- **Manager Access Select Program**

  Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. Advisor will assist the client in identifying a third-party portfolio manager (Portfolio Manager) from a list of Portfolio Managers made available by LPL Financial. The Portfolio Manager manages the client's assets on a discretionary basis. Advisor will provide initial and ongoing assistance regarding the Portfolio Manager selection process.

  A minimum account value of $50,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be higher.

An advisor recommending the wrap fee program receives compensation as a result of a client's participation in the program. The amount of this compensation may be more than what the person would receive if the client participated in other programs or paid separately for investment advice, brokerage, and other services. Therefore, advisors may have a financial incentive to recommend the wrap fee program over other programs or services.

There may be additional fees on assets held in the wrap program, such as mutual fund expenses and mark-ups, mark-downs, or spreads paid to market makers. A more detailed description of these fees and circumstances is detailed above in Item 4 above.

For more information about the associated person of the Advisor managing the account, the client should refer to the Brochure Supplement for the associated person, which the client should have received along with this Brochure at the time client opened the account.

LPL Financial performs certain administrative services for Advisor, including the generation of quarterly performance reports for program accounts. Client will receive an individual quarterly performance report, which provides performance information on a time-weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

Methods of Analysis and Investment Strategies

- **Alternative Strategy Mutual Funds.** Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable 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.

- **Closed-End Funds.** Client should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.

- **Exchange-Traded Funds (ETFs).** ETFs are typically investment companies that are legally classified as open-end mutual funds or UITs. However, they differ from traditional mutual funds in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the asking price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.

- **Exchange-Traded Notes (ETNs).** An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency, and equities. ETNs are similar to ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer's ability to pay. In addition, the trading price of the ETN in the secondary market may be adversely impacted if the issuer's credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class, or country and may therefore carry specific risks.

- **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.

- **Options.** Certain types of options trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client 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 the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.

- **Structured Products.** Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and are subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to the nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

- **Hedge Funds and Managed Futures.** Hedge and managed futures funds are available for purchase in the program by clients meeting certain qualification standards. Investing in these funds involves additional risks including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and the lack of liquidity and performance volatility. In addition, these funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing important tax information. Client should be aware that these funds are not liquid as there is no secondary trading market available. At the absolute discretion of the issuer of the fund, there may be certain repurchase offers made from time to time. However, there is no guarantee that the client will be able to redeem the fund during the repurchase offer.

- **Variable Annuities.** If the client purchases a variable annuity that is part of the 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. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts.

- **Margin Accounts.** Client 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 custodian, 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 the performance figures reflected on the quarterly advisory reports.

It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. Investing in securities involves the risk of loss that clients should be prepared to bear. For more information on Risks, please refer to the WCG Form ADV Part 2A Brochure, Item 8 Methods of Analysis, Investment Strategies, and Risk of Loss.

Voting Client Securities

Advisor does not accept authority to vote client securities. Clients retain the right to vote for all proxies that are solicited for securities held in the account. Clients will receive proxies or other solicitations from the custodian of assets. If clients have questions regarding the solicitation, they should contact the Advisor or the contact person that the issuer identifies in the proxy materials. In addition, Advisor does not accept authority to take action with respect to legal proceedings relating to securities held in the account.

Item 8: Client Information Provided to Portfolio Managers

In WCG Wrap Accounts, the IAR is responsible for account management; there is no separate portfolio manager involved. The IAR obtains the necessary financial data from the client and assists the client in setting an appropriate investment objective for the account. The IAR obtains this information by having the client complete an advisory agreement and other documentation. Clients are encouraged to contact the Advisor if there have been any changes in the client's financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Client should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Client should further be aware that achievement of the stated investment objective is a long-term goal for the account.

The Firm's policy requires an annual client meeting (one review every 12 months) to determine if there have been any changes in the client's financial situation, investment objectives, or restrictions. In addition, the meeting should incorporate the account performance, appropriateness of the account, and any other information determined pertinent to the client's situation. The annual meeting may occur by phone, in person, via e-mail, or video conference and documentation will be maintained to evidence that for example the following topics were reviewed:

- Client's financial status
- Risk Tolerance
- Time Horizon
- Investment Objective and Goals
- Asset Allocation and/or Account Holdings

Additionally, on a quarterly basis, IARs should review the performance of the client's advisory account and investment objectives.

Item 9: Client Contact with Portfolio Managers

Client should contact WCG at any time with questions regarding the program account.

Item 10: Requirements for State-Registered Advisers

We are not a state-registered adviser.

Item 11: Additional Information

Disciplinary Information

None

Other Financial Industry Activities and Affiliations

Advisor is only in the business of providing investment advice. However, associated persons of Advisor may also be separately licensed as Registered Representatives through LPL Financial. In this capacity, the associated person can sell securities to clients and receive normal and customary compensation in the form of commissions.

Associated persons may also be also insurance agents with various agencies including WCG Insurance Agency. WCG Insurance Agency is affiliated with WCG Wealth Advisors, LLC. In such capacity, they may offer fixed and variable life insurance products and receive normal and customary commissions as a result of any purchases made by clients.

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

A copy of the Advisor's Code of Ethics is available to clients or prospective clients upon request by contacting your advisor or by emailing compliance@wealthcg.com.

Advisor and its associated persons may invest in or otherwise own an interest in the same securities that are recommended to clients within program accounts. This creates a potential conflict of interest. All associated persons are required to place the interests of clients ahead of their own when making personal investments. In addition, Advisor requires that client transactions be placed before the associated person's personal transactions. Personal trading by associated persons is monitored by the Advisor. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor may not deem appropriate to buy or sell for clients.

Advisor does not engage in principal transactions with its clients in program accounts.

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

Review of Accounts

In addition, all program accounts are subjected to a risk-based exception reporting system that flags accounts on a quarterly basis for criteria such as performance, trading activity, and concentration. The exception reporting identifies accounts where additional scrutiny or analysis by Advisor may be appropriate.

For those clients to whom the firm 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.

During any month that there is activity in the program account, the client will receive a monthly account statement from the custodian showing account activity as well as positions held in the account at month's end.

Additionally, the client will receive a confirmation of each transaction that occurs within the program account unless the transaction is the result of a systematic purchase, redemption, or exchange. The client may also receive performance reports from their IAR on an ongoing basis.

Other Compensation

Advisor and its associated persons may receive additional non-cash 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 or marketing or advertising initiatives. Product sponsors may also pay for education or training events that may be attended by Advisor's employees and associated persons.

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

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.

Financial Information

Custody

LPL Financial, TD Ameritrade, Charles Schwab and Co., and Fidelity Brokerage Services are the qualified custodians and maintain custody of client funds and securities in a separate account for each client under the client's name. These qualified custodians send account statements showing all transactions, positions, and all deposits and withdrawals of principal and income. These custodians send monthly account statements when the account has had activity, quarterly, if there has been no activity, and clients, should carefully review those account statements.

Although most securities available in program accounts are custodied at the above-named custodians, there are certain securities managed as part of the account that are held at third parties. For example, variable annuities, hedge funds, and managed futures are often held directly with the investment sponsor. For those outside positions, the client will receive confirmations and statements directly from the investment sponsor.

For outside positions not custodied at LPL Financial, LPL Financial may receive information (e.g., number of shares held and market value) from the investment sponsor and display that information on statements and reports prepared by LPL Financial. Such information also may be used to calculate performance in performance reports prepared by LPL Financial. Although Advisor believes that the information provided by LPL Financial is accurate, Advisor recommends that clients refer to the statements and reports received directly from the investment sponsor and compare them with the information provided in any statements or reports from LPL Financial. The statements and reports provided by LPL Financial with respect to outside positions should not replace the statements and reports received directly from the investment custodians.

Brokerage Practices

In WCG Wrap Accounts, some Advisors can require that clients direct LPL Financial as the sole and exclusive broker-dealer to execute transactions in the account. LPL Financial is not paid a commission for executing transactions.

Because associated persons of the Advisor are licensed with LPL Financial, this presents a conflict of interest. Clients should understand that not all advisors require their clients to direct brokerage. By directing brokerage to LPL Financial, clients may be unable to achieve the most favorable execution of client transactions. Therefore, a directed brokerage may cost clients more money.

Advisor may receive support services and/or products from LPL Financial, which assist the Advisor to better monitor and service program accounts maintained at LPL Financial. These support services and/or products may be received without cost, at a discount, and/or at another negotiated rate, and may include the following:

- Investment-related research
- Pricing information and market data
- Software and other technology that provides 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 used by Advisor in furtherance of its investment advisory business operations

LPL Financial may provide these services and products directly or may arrange for third-party vendors to provide the services or products to Advisor. In the case of third-party vendors, LPL Financial may pay for some or all of the third party's fees.

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 involve the execution of client transactions as a condition of 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.

Advisor may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. Advisor may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, the liquidity of the securities, and the discretionary or non-discretionary nature of the trades. If Advisor does not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money. For more information on our Brokerage Practices, please refer to Item 12 in the WCG Form ADV Part 2A Brochure.