

ITEM 1 – COVER PAGE



W O M A C K

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March 19, 2021

ADV Part 2A/2B Brochure

This brochure provides information about the qualifications and business practices of Womack Investment Advisers, Inc. If you have any questions about the contents of this brochure, please contact us at (405)340-1717. 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. Womack Investment Advisers, Inc. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Additional information about Womack Investment Advisers, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Womack Investment Advisers, Inc. is 118081.

ITEM 2 - MATERIAL CHANGES

Summary of Material Changes

Set forth below is a summary of material changes in this brochure from our last annual update. There have been no material changes since our last annual update on March 30, 2020. If you would like another copy of this Brochure, please download it from the SEC Website as indicated above or contact our Chief Compliance Officer, Greg Womack, at (405) 340-1717 or greg@womackadvisers.com.

We encourage you to read this document in its entirety.

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ITEM 4 - ADVISORY BUSINESS

This Disclosure document is being offered to you by Womack Investment Advisers, Inc. (“WIA”) in connection with the investment advisory services we provide. It discloses information about the services we provide and the manner in which we provide them to you, the Client.

WIA is a fee-based investment management firm located in Edmond, Oklahoma, and San Diego, California, specializing in designing, implementing, and managing investments for individuals and small businesses. The firm was established in January 2000 and is owned 100% by Greg Womack.

Investment Management and Supervision Services

WIA offers discretionary investment management and investment supervisory services for a fee, which is based on a percentage of each client’s assets under management. These services include investment analysis, allocation of investments, quarterly performance reports, and ongoing monitoring services for the portfolio.

WIA determines your portfolio composition based on your needs, portfolio restrictions—if any—your financial goals, and risk tolerances. We will work with you to obtain necessary information regarding your financial condition, investment objectives, liquidity requirements, risk tolerance, time horizons, and any restrictions on investing. This enables us to determine the portfolio best suited for your investment needs and objectives. Depending on your needs and goals, we may construct a portfolio specific to you based on one of the objectives of our CORE Models. In addition to our CORE Models, Specialty Model Portfolios are available to Clients who meet certain risk and philosophical objectives. An Individual Stocks and Options Program (“ISOP”) is available for our Clients who desire to have individual assets, such as stocks, options, and other securities, managed separately by us.

In performing our services, we are not required to verify any information received from you or from other professionals. At your request, we may recommend and/or engage the services of other professionals for implementation purposes. You are under no obligation to engage the services of any recommended professional.

Once we have designed the types of investments to be included in your portfolio and allocated them accordingly, we will provide you with ongoing portfolio reviews and management services. This approach requires us to review the portfolios on a frequent basis or as market conditions dictate. We will rebalance the portfolio, as we deem appropriate on a discretionary basis, to meet your financial objectives.

In all cases, you have a direct and beneficial interest in your securities, rather than an undivided interest in a pool of securities. You will have the ability to leave standing instructions with us to refrain from investing in particular industries or to invest in limited amounts of securities.

Our advisory services are tailored to you as an individual; yet when using mutual funds or Exchange Traded Funds (“ETFs”), known as a multi-fund manager approach, it is difficult for us to ensure your portfolio will not invest in a particular industry or security. However, we are happy to discuss your preferences regarding socially conscious investment concerns, and we’ll try, as much as possible, to accommodate them.

You are advised and are expected to understand that our past performance is not a guarantee of future results. Certain market and economic risks exist that may adversely affect an account’s performance and could result in capital losses in your account.

Financial Planning and Wealth Management Services

Our Financial Planning Services establish financial objectives for you, the Client, by collecting data, reviewing your financial information, and producing a financial report. An Investment Adviser Representative (“IAR”) will meet with you for the purpose of acquiring data concerning your assets, liabilities, present and anticipated obligations, present and future income, and financial goals. We prepare a report, which may include specific recommendations to purchase, hold, or sell securities. We may prepare more extensive financial plans, which may include, but are not limited to, recommendations with respect to cash flow, asset allocation, insurance analysis, education funding, retirement planning, estate planning, financial and portfolio performance reports, business retirement planning, or general advice. Financial Planning may also be of a more limited nature, focusing on a specific area of your finances.

Upon completion and delivery of the report, you are free to implement the plan through whomever you so choose. Should you wish to engage WIA to implement securities recommendations, certain IARs of the Firm are licensed to transact Insurance business, and as such, may receive commissions for those Insurance transactions. Any commissions earned are separate and distinct from the advisory fees paid to us for the financial planning services rendered.

Our Wealth Management Services provide annual updates of your financial plan and on-going monitoring of your financial situation.

Third-Party Money Managers “TPM”

Selected Third-Party Managers (TPM) (“Managers”) are evaluated by WIA for your use. TPM services may include assisting you, the Client, in identifying your investment objectives and matching personal and financial data with a select list of Managers that meet the TPM minimum quantitative and qualitative criteria. The intent of this service is to have a selected list of high quality and recognizable third-party investment management firms from which you select one or more Managers to handle the day-to-day management of your account(s). Following recommendations by WIA, you will have final authority to select a Manager. We may assist you in completing appropriate Manager-related documents. Following the selection of a Manager, WIA will approve the appropriateness of the selected Manager.

Managers selected for use by Clients under our TPM program need to meet several quantitative and qualitative criteria established by WIA. Among the criteria considered are the manager's experience, assets under management, performance record, Client retention, the level of Client services provided, investment style, buy and sell disciplines, capitalization level, and the general investment process. Prior to selection, all Managers are interviewed by a member of our Firm. To qualify for the TPM, Clients must also have a profile that matches the Manager's stated objectives.

A Manager relationship may be terminated at your request, as the Client, or at our discretion. We may at any time terminate the relationship with a Manager who manages your assets; we will notify you if a relationship is terminated with any Manager with whom you have invested. We will not conduct on-going supervisory reviews following such termination.

Factors involved in the termination of a Manager may include a failure to adhere to management style or your objectives, a material change in the professional staff of the Manager, unexplained poor performance, and dispersions of Client account performance, or our decision to no longer include the Manager on our list of approved Managers.

You are advised and should understand that:

- A Manager's past performance is no guarantee of future results;
- There is a certain market and/or interest rate risk which may adversely affect any Manager's objectives and strategies, and could cause a loss in a Client's account(s); and
- Client risk parameters or comparative index selections provided to WIA are guidelines only and there is no guarantee that they will be met or not be exceeded.

All accounts are managed by the selected Manager and WIA does not have any discretionary trading authority with respect to such accounts. Information collected by us regarding TPM is believed to be reliable and accurate but we do not necessarily independently review or verify it on all occasions. All performance reporting will be the responsibility of the respective Manager. Such performance reports will be provided directly to you and WIA. We do not audit or verify that these results are calculated on a uniform or consistent basis as provided by a Manager directly to us or through the consulting service utilized by the Manager.

Sub-Adviser Relationships

We have entered into agreements with several investment advisers to act as a sub-adviser to WIA. These investment advisers will furnish WIA with investment advisory services with respect to certain designated client assets enrolling in a WIA investment service sub-advised by third party advisers.

The sub-advisers shall assist WIA in managing the day-to-day investment operations of the various allocations, shall determine the composition of the investments comprising the allocation, shall determine what securities and other assets of the allocation will be acquired, held, disposed of, or loaned in conformity with the written investment objectives,

policies and restrictions, and other statements of each client comprising the allocation, or as instructed by WIA.

Educational Seminars/Workshops

From time to time, our Investment Advisor Representatives (“IARs”) may present financial or investment related seminars to educate our clients and/or the general investing public. The seminar materials and any handouts provided may either be prepared by an IAR or by an unaffiliated publisher or distributor of investment seminar materials. The materials presented at the seminars and the seminars in general are intended to be purely educational in nature. Neither the information discussed at seminars nor the information contained in the seminar materials or any handouts, which may be distributed, are intended as specific investment advice. We do not support that any information provided to you during a seminar will be appropriate for your situation or will help you to meet your financial goals or objectives.

Your attendance at a seminar does not require you to complete an advisory agreement with our IAR. If you attend a seminar, you are our client for purposes of the seminar only. You cease to be our client following the conclusion of the seminar unless you subsequently engage us to provide additional advisory services through the execution of an Advisory Service Agreement.

Consulting

Clients can also receive investment advice on a more limited basis. This may include advice on one or more isolated areas of concern, such as limited partnerships in cable television, oil/gas, leasing, venture capital, real estate investment trusts, employee benefit design, and debt-related real estate offerings. You may also arrange for advice of a financial nature, not specifically related to securities. Additionally, we may provide advice on non-securities matters, such as estate, tax, or retirement planning; insurance; real estate; and/or annuity advice.

WIA may provide insurance analysis for you, as a Client. This will include a review of your existing insurance policies and recommendations on what type of policy is needed to achieve your insurance objectives.

At WIA, certain Investment Adviser Representatives (“IARs”) are permitted to perform percentage-based evaluation services. Such evaluations are as of a specific point in time and may not provide for constant monitoring. However, individuals may arrange for ongoing investment advisory or financial planning services, including ongoing evaluations, consultations, and/or record maintenance.

Assets Under Management

As of December 31, 2020, WIA manages \$70,110,680.51 in assets; \$54,333,053.87 on a discretionary basis and \$15,777,626.64 on a non-discretionary basis.

ITEM 5 - FEES AND COMPENSATION

Investment Management and Supervision Services

Our fee includes compensation for the advisory and consulting services (provided by WIA), trade entry, and other account-related services. The fees for accounts are based on an annual percentage of assets under management. The fees are applied to the account asset value on a prorated basis and billed quarterly in advance. The initial fee is based upon the date the account is accepted for management by execution of the investment Advisory Service Agreement and the transfer of assets through the last day of the current calendar quarter. A potential mid-quarter fee, based on additional contributions made during a quarter, is reviewed at the end of each month. A determination will be made whether to withdrawal prorated management fees or to wait for the next quarterly billing. Thereafter, the fee is based on the market value of the account on the last day of the previous calendar quarter and will cover the period from the first day of the calendar quarter through the last day of the calendar quarter. The market value is determined by the Custodian. Fees are assessed on all assets under management, including securities, cash, and money market balances. Margin and/or debit balances do not reduce the value of assets under management. Cash withdrawals from accounts greater than \$5,000 will be reviewed at the end of a billed quarter and may receive a prorated credit, which will be applied on the next billing cycle.

Fees may vary based on the size of the account, complexity of the portfolio, extent of activity in the account, or other reasons agreed upon by WIA and the Client. Fees follow the schedule of assets under management outlined below. In certain circumstances, fees may be negotiated.

Advisory fees are paid quarterly, in advance, for all WIA CORE Models and WIA Specialty Model Portfolios, and are as follows:

First \$250,000	1.5% annually
Next \$750,000	1.25% annually
Over \$1,000,000	0.65% annually

You, the Client, authorize us to debit your account quarterly for our fee. Either party, upon written notice from the terminating party to the other party, may terminate the Advisory Services Agreement. This advisory agreement may be terminated by you within five (5) business days of its signing without incurring any advisory fees. If the Advisory Service Agreement is terminated prior to the last day of the calendar quarter, a prorated portion of the fee paid for that quarter (based on the number of days remaining) may be refunded to you after review.

At our discretion, we may allow accounts of members of the same household to be aggregated for purposes of determining the advisory fee. We may allow such aggregation, for example, where we service accounts on behalf of minor children of current Clients, individual and joint accounts for a spouse, and other types of related accounts. This consolidation practice is designed to allow you the benefit of an increased asset total, which

could potentially cause the account(s) assessed to receive a reduced advisory fee based on the breakpoints available in our fee schedule.

The independent qualified custodian holding your funds and securities will debit your account directly for our advisory fees. In our Advisory Service Agreement, you provide written authorization permitting the fees to be paid directly from your account held by the qualified custodian. We will not have access to your funds for payment of fees without your written consent. Further, the qualified custodian agrees to deliver an account statement, at least quarterly, directly to you indicating all the amounts disbursed from the account, including the amount of advisory fees. You are encouraged to review your account statements for accuracy. WIA will also have online access to the custodian's account statements delivered to you.

If you close your account within the first 12 months after it is opened, you agree to pay an administrative fee (the "Administrative Fee") to defray initial account setup and administrative costs. The Administrative Fee is \$250. The Administrative Fee may be waived for Clients transferring to certain other managed asset programs approved by WIA or at our discretion.

Individual Stocks and Options Program

For Clients who desire to have individual positions, including stocks, options, and other securities managed by us, an Individual Stocks and Options Program ("ISOP") is available. The advisory fees for an ISOP are paid quarterly, in advance, as follows:

First million	2.25% annually
Next two million	1.75% annually
Over three million	1.00% annually

The fees for ISOPs are based on an annual percentage of assets under management. The fees are applied to the account asset value on a prorated basis and billed quarterly in advance. The initial fee will be based on the date the account is accepted for management by execution of the Advisory Service Agreement and the transfer of assets through the last day of the current calendar quarter. Thereafter, the fee will be based on the market value of the account on the last day of the previous calendar quarter and will cover the period from the first day of the calendar quarter through the last day of the calendar quarter. The market value is determined by the Custodian. As an advisory client, you have the right to terminate the contract without penalty within five (5) business days after signing the Advisory Service Agreement. If the advisory agreement is terminated prior to the last day of the calendar quarter, a prorated portion of the fee paid for that quarter (based on the number of days remaining) may be refunded to you after review.

If you close your account within the first 12 months after it is opened, you agree to pay an administrative fee (the "Administrative Fee") to defray initial account setup and administrative costs. The Administrative Fee is \$250. The Administrative Fee may be waived for Clients transferring to certain other managed asset programs approved by WIA or at our discretion.

Any transaction fees charged by the custodian to you, the Client, are separate and distinct from the advisory fees charged by WIA. WIA does not receive compensation from sale of securities or other investment products.

WIA may invest a portion of your assets in mutual funds, exchange traded funds (ETFs), or variable annuities. All these products may charge an investment management fee on your assets invested in these securities. Therefore, you may pay two levels of fees for the management of your assets, one directly to WIA and one indirectly to the managers of the mutual funds, ETFs, or variable annuities held in your portfolios.

Financial Planning and Wealth Management Services

The fees for Financial Planning Services are based on an hourly rate from \$100 to \$500 or on a fixed, predetermined amount. The fees for Wealth Management Services range from .25% to 1.00% annually (based on the total assets in the estate) and are billed quarterly, in advance. Fees are determined by the estimated hours and the complexity of the estate. Financial planning services and wealth management services require a minimum annual payment amount of \$1,500. All fees are agreed upon prior to entering into a contract with you.

The fees for on-going Financial Planning and Wealth Management Services may be reduced or waived if you place assets for WIA to manage within one of our stated investment advisory models or other approved third-party management plans.

As compensation for rendering the financial planning services described above, you, the Client, agree to pay WIA half of the fee prior to the initiation of the financial plan, and the remaining half to be paid as services are rendered or upon completion of the services provided. Financial Planning fees are negotiable.

We strive to present the financial plan to you, the Client, within 90 days of the contract date, but no greater than 6 months from the contract date, provided you have supplied all information needed to prepare the financial plan. Fees for financial planning are established as an hourly rate from \$100 to \$500, depending on the experience of the individual investment adviser representative (“IAR”), sophistication, and complexity of the plan and services rendered. Under such arrangement, an initial estimated fee of time necessary to complete the analysis and/or services will be agreed upon between you and WIA. Should any additional hours be warranted, you will be notified, and an invoice will be sent to you for the additional hours billed.

As an advisory client, you have the right to terminate the contract without penalty within five (5) business days after entering into the contract. Financial Planning Service Agreements terminate at the time the services are delivered and provided. If the agreement is terminated prior to the completion of the project, any pre-paid fees received by us may be returned to you on a prorated basis after review.

Either WIA or you, the Client, may terminate the Wealth Management Agreement, upon written notice to the other party. The fee will be prorated to the date of termination, for the

quarter in which the cancellation notice was given, and any unearned fees will be refunded to you. Upon termination, you are responsible for monitoring the securities in your account, and we will have no further obligation to act or advise with respect to those assets.

Third-Party Money Managers

TPM fees are outlined in each respective Manager's Brochure and Advisory Contract. WIA will be paid a quarterly fee, in advance, based on a percentage of your assets under management with respect to each Manager. In some cases, the TPM's fees may be reduced, and WIA will charge an advisory fee to monitor your account with the Managers. In this scenario, WIA will not receive a portion of the Manager fees. You will receive a copy of the Manager's Form ADV, which will disclose their fees. We may negotiate each fee with the Manager. WIA has a potential conflict of interest to recommend selections of management styles and Managers that would result in higher advisory fees paid to us. We will make all recommendations independent of such fee consideration and based solely on its obligations to consider your objectives and needs. The minimum account size will vary from Manager to Manager. All such minimums will be disclosed in the respective Manager's Brochure. WIA may have the ability to negotiate such minimums. You may terminate your relationship in accordance with the respective Managers' disclosure documents. An advisory client has a right to terminate the contract without penalty within five (5) business days after entering into the contract. Prepaid fees will be refunded in accordance with the respective Manager's agreement and disclosure documents.

When representatives of WIA refer Clients to other registered investment advisers, WIA will receive a portion of the fee the Client pays to the other registered investment adviser, or may charge its own management fee, depending on the arrangement with the TPM. WIA receives between 0.25%–1% of the assets under management, depending on the size of account. If the other registered investment adviser refunds all or any part of an advisory fee to a Client, we will refund our portion of those fees as well. The fees charged by other registered investment advisers and the nature of their programs will be described in the respective investment adviser's disclosure documents. Combined fees charged by WIA and Third-Party Managers will not exceed 3% annually.

Consulting

Fees charged for general consulting are either based on a negotiated flat rate or an hourly rate varying between \$200 and \$750 an hour. The fee is negotiated with you, the Client, depending on the scope of the project. You may elect to pay 50% of the fee in advance and the remainder upon completion of the services, according to the terms of the Consulting Agreement. If you select a flat fee and pay in advance, then terminate the agreement, we will calculate a prorated refund of any fees not yet earned based on the percentage of the completion of the project. The fees based hourly will be mutually agreed upon by you and WIA and will be due and payable as earned. Hourly fees are billed by invoice as the services are rendered. The hourly rate varies between \$200 and \$750 an hour. You will be notified, should any additional hours be warranted, and an invoice will be sent to you for the additional hours billed. Flat rate consulting fees range between \$200 and \$50,000 and are determined by the complexity of the project combined with time spent. Fees are negotiable.

If an Insurance Analysis is provided, additional advisory fees may or may not be charged, depending on whether we receive compensation in the form of life insurance commissions. If we receive life insurance commissions, advisory services will not be charged. Fees will only be charged if we provide recommendations for insurance analysis and we are not the writing agent, or if we assist you, the Client, in obtaining life insurance products on a no-load basis.

WIA will not collect more than \$500 in fees, per client, per six months or more in advance, for any of the above mentioned insurance-related services. As an advisory client, you have the right to terminate the contract without penalty within five (5) business days after entering into the contract. If the agreement is terminated prior to the conclusion of the evaluation, a prorated refund may be provided to you after review.

Seminars

Fees charged for providing seminars to businesses, charities, and other organizations are either based on a negotiated flat rate, ranging from \$500 to \$10,000, or on an hourly rate, varying between \$200 and \$750 an hour. The fee is negotiable, depending on the scope of the project. You may elect to pay 50% of the fee in advance of the seminar and the remaining 50% upon completion of the seminar.

Advisory Fees in General

Clients should note that similar advisory services may or may not be available from other registered (or unregistered) investment advisers for similar or lower fees.

Additional Fees and Expenses:

In addition to the advisory fees paid to our Firm, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively “Financial Institutions”). These additional charges include securities, transaction fees, custodial fees, fees charged by the Independent Managers, charges imposed by a mutual fund or ETF in a client’s account, as disclosed in the fund’s prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Our brokerage practices are described at length in Item 12, below. Neither our Firm nor its supervised persons accept compensation for the sale of securities. Further, our firm does not share in any of these additional fees and expenses outlined above.

WIA may include mutual funds and exchange traded funds, (“ETFs”) in our investment strategies. WIA’s policy is to purchase institutional share classes of those mutual funds selected for the client’s portfolio. The institutional share class generally has the lowest expense ratio. The expense ratio is the annual fee that all mutual funds or ETFs charge their shareholders. It expresses the percentage of assets deducted each fiscal year for funds expenses, including 12b-1 fees, management fees, administrative fees, operating costs, and all other asset-based costs incurred by the fund. Some fund families offer different classes of the same fund and one share class may have a lower expense ratio than another share class. These expenses come from client assets which could impact the client’s account

performance. Mutual fund expense ratios are in addition to our fee, and we do not receive any portion of these charges. If an institutional share class is not available for the mutual fund selected, the adviser will purchase the least expensive share class available for the mutual fund. As share classes with lower expense ratios become available, WIA may use them in the client's portfolio, and/or convert the existing mutual fund position to the lower cost share class. Clients who transfer mutual funds into their accounts with WIA would bear the expense of any contingent or deferred sales loads incurred upon selling the product. If a mutual fund has a frequent trading policy, the policy can limit a client's transactions in shares of the fund (e.g., for rebalancing, liquidations, deposits or tax harvesting). All mutual fund expenses and fees are disclosed in the respective mutual fund prospectus.

When selecting investments for our clients' portfolios we might choose mutual funds on your account custodian's Non-Transaction Fee (NTF) list. This means that your account custodian will not charge a transaction fee or commission associated with the purchase or sale of the mutual fund.

The mutual fund companies that choose to participate in your custodian's NTF fund program pay a fee to be included in the NTF program. The fee that a mutual fund company pays to participate in the program is ultimately borne by the owners of the mutual fund including clients of our Firm. When we decide whether to choose a fund from your custodian's NTF list or not, we consider our expected holding period of the fund, the position size and the expense ratio of the fund versus alternative funds. Depending on our analysis and future events, NTF funds might not always be in your best interest.

Administrative Services Provided by Orion

We have contracted with Orion to utilize its technology platforms to support data reconciliation, performance reporting, fee calculation and billing, client database maintenance, quarterly performance evaluations, payable reports, and other functions related to the administrative tasks of managing client accounts. Due to this arrangement, Orion will have access to client information, but Orion will not serve as an investment advisor to our clients. WIA and Orion are non-affiliated companies. Orion charges our Firm an annual fee for each account administered by Orion. Please note that the fee charged to the client will not increase due to the annual fee WIA pays to Orion, the annual fee is paid from the portion of the management fee retained by our Firm.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Neither WIA nor any supervised persons charge or participate in any performance-based compensation arrangements.

ITEM -7 TYPES OF CLIENTS

WIA provides investment advice to individuals, high-net-worth individuals, businesses, pension and profit-sharing plans, trusts, and charitable organizations.

We impose a minimum of \$100,000 to open and maintain an advisory account. WIA Specialty Model Portfolios and the Individual Stocks and Options Program (ISOP) require a minimum account balance of \$250,000. However, these account minimums may be waived at our discretion. In addition, we may household your accounts to meet the stated minimum requirement.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

The method of analysis we utilize is fundamental and technical. We gather our information for investment purposes from financial newspapers, magazines, websites, research prepared by others, corporate rating services, annual reports, prospectuses, filings with the SEC, and company press releases.

We utilize the research tools and risk assessment provided through Riskalyze and the Sherman Sheet as well as other independent research and charting services and mutual fund and stock research; these provide support in designing the models and specific assets for each portfolio strategy. The main goal of each portfolio is to provide efficient returns with reduced risk compared to a stated index. A risk analysis is performed to determine a portfolio's risk and return compared to a benchmark, such as the Standard & Poor's ("S&P") 500 Index.

When appropriate, we will rebalance our portfolios to meet our Clients' financial objectives and rebalance them back to the original allocations periodically at our discretion, depending on market conditions and other factors within the minimum limitations set. Rebalances may occur more frequently during or after periods of unusual or extreme market volatility. Each position is evaluated on a periodic basis for its risk/return rating, changes in management, or other significant events that may warrant replacement with an alternative holding.

WIA CORE Model Portfolios

Depending on the needs and goals of our Clients, we may construct a portfolio specific to the Client based on one of the following objectives:

Conservative – emphasis on income and preservation of principal with growth potential for inflation offset.

Moderate – emphasis on modest income with growth potential.

Growth – emphasis on growth potential with limited income for diversification.

Our Clients complete an Investment Risk Questionnaire to assist in determining the appropriate portfolio model. Each model is constructed in conjunction with the modern portfolio theory of asset allocation and may include the following asset classes: cash, bonds, stocks (foreign and domestic), real estate, natural resources and precious metals, commodity-based funds, and other alternative strategies. Mutual funds, exchange-traded funds ("ETFs"), and closed-end funds are mainly used to provide diversification for the

specific asset classes used. Different asset classes and sectors are used, which historically have provided a low correlation between the various asset classes. CORE Model Portfolios are structured for a “buy-and-hold” strategy to take advantage of time in the markets based upon the Client’s objectives, time horizon, and risk tolerance.

WIA CORE Models attempt to provide some exposure to certain assets, which have possessed low-correlated characteristics compared to the general stock markets. There is no guarantee that the selected investments for each Model will outperform the general stock market nor will it guarantee against any losses. Certain economic factors, including a prolonged downturn (“bear market”) in the U.S. and international stock markets, could have a negative effect on the portfolios.

WIA Specialty Model Portfolios:

In addition to the WIA CORE Models, Specialty Model Portfolios are available to Clients who meet certain risk and philosophical objectives. Our Specialty Models are designed and specifically built for individual clients based on their risk level, restrictions (if any), and objectives. These specialty portfolios require a minimum account balance of \$250,000. However, this account minimum may be waived at our discretion.

Individual Stocks and Options Program:

For Clients who desire to have individual positions, including stocks, options, and other securities managed by us, an Individual Stocks and Options Program (ISOP) is available. These portfolios and investment strategies are developed with a mind’s eye on an individual investor’s personal situation, goals and objectives, risk tolerance, and suitability. These portfolios are highly individualized to each client. The ISOP requires a minimum account balance of \$250,000. However, this minimum may be waived at our discretion.

Risks

Investing in securities involves risk of loss which Clients should be prepared to bear. Our past performance is not a guarantee of future results. Certain market and economic risks exist that may adversely affect an account’s performance, which could result in capital losses in your account.

The following is a description of the principal risks of the portfolios, which may adversely affect its total return. There are other circumstances (including additional risks that are not described here), which could prevent your portfolio from achieving its investment objective.

Stock Market Risk – The value of equity securities and bonds in the portfolios will fluctuate, and as a result the value of the portfolios may decline suddenly or over a period of time.

Managed Portfolio Risk – The manager’s investment strategies or choice of specific securities may be unsuccessful and may cause the portfolio to incur losses.

Industry Risk – The portfolio’s investments could be concentrated within one industry or group of industries. Any factors detrimental to the performance of such industries will disproportionately impact your portfolio. Investments focused in a particular industry are subject to greater risk and are more greatly impacted by market volatility than less concentrated investments.

Legislative Risk – Legislative authorities may change tax laws in the future. Some changes may cause the Client to pay more investment-related taxes.

Non-U.S. Securities Risk – Non-U.S. securities are subject to the risks of foreign currency fluctuations (which are generally higher volatility and lower liquidity than U.S. securities), less developed securities markets and economic systems, and political and economic instability.

Emerging Markets Risk – To the extent that your portfolio invests in issuers located in emerging markets, the risk may be heightened by political changes and changes in taxation or currency controls, which could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

Currency Risk – The value of your portfolio’s investments may fall as a result of changes in exchange rates.

Use of Options - Our firm may use Options. The predominant use of options at our firm is selling covered call contracts (“covered call”) or cash-covered put contracts (“covered put”). It is WIA’s practice to avoid using margin when dealing with options, therefore all options are purchased with available cash or securities in a client’s account. When the investor sells the call option on a security held in the portfolio, the benefit is to increase income while holding the security. The covered call is a conservative way to participate in the options market. However, the investor limits the upside potential of the stock in a rising market if the stock increases in value over the strike price. The client can also suffer from a declining market in the value of the stock, but can continue to sell more call options. The premium received is taxable income unless the account is held in a tax-deferred plan (i.e. IRA). The sale of the stock at the strike price may be a taxable event. Other basic option contracts may be utilized at times by our firm, although not as a primary strategy. This includes buying a call or put option. These contracts have different and increased risks than the strategy described above. Options investors will receive a copy of Characteristics and Risks of Standardized Options published by The Options Clearing Corporation.

Cybersecurity Risk - In addition to the Material Risks listed above, investing involves various operational and “cybersecurity” risks. These risks include both intentional and unintentional events at WIA or one of its third-party counterparties or service providers, which may result in a loss or corruption of data or the unauthorized release or other misuse of confidential information, and generally compromise our Firm’s ability to conduct its business. A cybersecurity breach may also result in a third-party obtaining unauthorized access to our clients’ information, including social security numbers, home addresses, account numbers, account balances, and account holdings. Our Firm has established

business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches. However, there are inherent limitations in these plans and systems, including that certain risks may not have been identified, in large part because different or unknown threats may emerge in the future. As such, there is no guarantee that such efforts will succeed, especially because our Firm does not directly control the cybersecurity systems of our third-party service providers. There is also a risk that cybersecurity breaches may not be detected.

ITEM 9 - DISCIPLINARY INFORMATION

WIA does not have any legal or other “disciplinary” events to report.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Investment Advisory Representatives (“IARs”) of WIA are not registered, nor have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

IARs of WIA are not registered, nor have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

IARs of WIA do receive compensation directly or indirectly from those advisers who recommend or select other investment advisers for our clients through their Third Party Managers (“TPM”).

IARs of WIA select other advisers for our clients. WIA ensures they are properly licensed or registered as investment advisers before they are selected.

Third-Party Client Services – Chicago Clearing Corporation

Our firm has engaged a third-party service provider, Chicago Clearing Corporation (“CCC”), to monitor and file securities claims class action litigation paperwork with claims administrators on behalf of the Firm’s clients. When a claim is settled and payments are awarded to our clients, it may be necessary to share client information, such as name and account number, with CCC in connection with this service.

CCC earns a fee based on a flat percentage of all claims it collects on behalf of our clients. This fee is collected and retained by CCC out of the claims paid by the claim administrator. We do not receive any fees or remuneration in connection with this service.

Clients may opt out of this service at any time. If a client opts out, we do not have an obligation to advise or take any action on behalf of a client with regard to class action litigation involving investments held in or formerly held in a client’s account.

Insurance

Some of our IARs may act as agents and are appointed with various life, disability or other insurance companies and receive commissions, trails, or other compensation from the respective product sponsors and/or as a result of effecting insurance transactions for clients. You have the right to decide whether or not to act on the insurance recommendations from our IARs. If you decide to act upon our IAR’s insurance recommendations, you have the

right to choose the insurance professional to use to purchase the insurance products through our IARs or any licensed insurance agent not affiliated with WIA. We recognize the fiduciary responsibility to place your interests first and have established policies in this regard to mitigate any conflicts of interest.

ITEM 11 - CODE OF ETHICS PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

On occasion, we may invest in our own accounts or have a financial interest in the same securities or other investments that we recommend or acquire for the accounts of our clients. Further, we may also engage in transactions that are the same as or different than transactions recommended to or made for our clients' accounts. Such transactions are permitted if effected, pre-cleared, and reported on in compliance with our policy on personal securities transactions. Personal securities transactions will not be pre-cleared when an order for the same or a related security is pending for the account of a client.

Our Chief Compliance Officer ("CCO") reviews reports of personal transactions in securities by all of our associated persons quarterly or more frequently if required.

Investment Policy

None of our associated persons may effect for himself/herself, or for accounts in which he/she holds a beneficial interest, any transactions in a security that is being actively recommended to any of our clients, unless in accordance with the Firm's procedures, which are as follows:

Firm Procedures

In order to implement our Investment Policy, the following procedures have been put into place:

- 1) If we are recommending that any of our clients buy any security, no associated person may purchase that security prior to a client's purchase of said security; and
- 2) If we are recommending that any of our clients sell any security, no associated person may sell that security prior to a client's sale of said security.

As an alternative to the procedures described above, we may include our own order(s) in a batch order with other client orders, which involve average pricing for the entire batch so that we receive the same pricing as all other clients participating in the batch. Thus, the employee never gets a "better" price than the client. If the security purchased by an employee does not get the same price as the client's trade, then the custodian will be notified and asked to adjust the trade accordingly.

It is the primary intent of these procedures to ensure the best interests of our clients are always served over those of our own. Trading on our own behalf that results in our own interests being served over those of our clients could be considered a breach of our fiduciary duty and thus, is aggressively discouraged.

WIA has adopted a **Code of Ethics**, which governs the firm and its employees' behavior regarding a number of potential conflicts of interest when providing you service. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you, our Client (or Prospective Client), and maintain a Culture of Compliance within our firm.

The primary purpose of our Code of Ethics is to detect and prevent violations of securities laws, including obligations owed to you.

We distribute our Code of Ethics to each employee at the time of hire, and annually thereafter (if changes occur). We provide annual training to employees to supplement the Code of Ethics and monitor employee activities on an on-going basis.

Our Code of Ethics includes the following:

- Requirements for maintaining our Clients' confidentiality;
- Prohibitions on:
 - Insider trading (if we are in possession of material, non-public information);
 - Rumor mongering;
 - The acceptance of gifts and entertainment that exceed our policy standards;
- Reporting of gifts and business entertainment;
- Preclearance of employee and firm transactions; and
- Reporting (on an on-going, quarterly basis) all personal securities transactions (what we call "reportable securities" as mandated by regulation).

We require all employees to re-certify their acceptance of our Code of Ethics on a quarterly basis by signing a Brokerage Disclosure Form. This includes identifying members of their household and any account to which they have a beneficial ownership (meaning they "own" the account or have "authority" over the account), and disclosing all securities they hold at that time, including those held in certificate form.

Our Code does not prohibit personal trading by employees. As you may imagine, as a professional investment adviser, we follow our own advice. As a result, we may purchase or sell the same or similar securities (or securities suitable for an employee's account, which may not be suitable for any Client's account, including yours) at the same time that we place transactions for your account and the accounts of our other Clients.

We designed the Code of Ethics to:

- protect our Clients by deterring misconduct;
- educate personnel regarding the firm's expectations and laws governing their conduct;
- remind personnel they are in a position of trust and must act with complete propriety at all times;
- protect the reputation of WIA;
- guard against violation of the securities laws; and

- establish procedures for personnel to follow so that WIA may determine whether its personnel are complying with the firm’s ethical principles.

You may request a complete copy of our Code of Ethics by contacting us at the address, telephone, or email listed on the cover page of this brochure; Attn.: Chief Compliance Officer.

ITEM 12 - BROKERAGE PRACTICES

The Custodian and Brokers We Use

Investment Management Services

Clients must maintain assets in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend our clients use Charles Schwab & Co., Inc. Advisor Services (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and unaffiliated with Schwab. Schwab will hold client assets in a brokerage account and buy and sell securities when we instruct them to.

While we recommend clients use Schwab as custodian/broker, clients must decide whether to do so and open accounts with Schwab by entering into account agreements directly with them. The Client opens the account with Schwab, and his/her account will always be registered in the name of the client and never in WIA’s name. Even though Clients maintain accounts at Schwab, we can still use other brokers to execute trades for client accounts (see *Client Brokerage and Custody Costs*, below).

How We Select Brokers/Custodians

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

1. Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
2. Capability to execute, clear, and settle trades (buy and sell securities for client accounts);
3. Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
4. Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.);
5. Availability of investment research and tools that assist us in making investment decisions;
6. Quality of services;
7. Competitiveness of the price of those services (commission rates, other fees, etc.) and willingness to negotiate the prices;
8. Availability of other products and services that benefit us, as discussed below (see *Products and Services Available to Us from Schwab*); and their
9. Reputation, financial strength, and stability; and

10. Prior service to WIA and our other clients.

Client Brokerage and Custody Costs

For our Clients' accounts, which Schwab maintains, Schwab generally does not charge a separate fee for custody services. However, Schwab receives compensation by charging a ticket charge or other fees on trades, which are executed or settled into a client's Schwab account. In addition to commissions, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade we have executed by a different custodian, but where the securities bought or the funds from the securities sold are deposited (settled) into a client's Schwab account. These fees are in addition to the ticket charges or other compensation the client pays the executing custodian. Because of this, in order to minimize trading costs, we have Schwab execute most trades for client accounts. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of client trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see *How We Select Brokers/Custodians*).

Products and Services Available to Us from Schwab

Schwab Advisor Services™ (formerly Schwab Institutional®) serves independent investment advisory firms like WIA. It provides WIA (and our clients) with access to Schwab's brokerage, trading, custody, reporting, research, and other related services, many of which are typically unavailable to Schwab retail customers. Schwab provides various support services; some of which 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 cost to us. These are considered soft dollar benefits because there is an incentive to do business with Schwab. This creates a conflict of interest. We recognize the fiduciary responsibility to place our Clients' interests first and have established policies in this regard to mitigate any conflicts of interest.

The following provides a more detailed description of Schwab's support services:

Services That Benefit Our Clients

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 products that we may not otherwise have access to or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit our clients and their accounts.

Services That May Not Directly Benefit Our Clients

Schwab also makes other products and services available to us that benefit us but may not directly benefit our clients or their accounts. These products and services assist us in managing and administering our clients' accounts. This includes investment research, both Schwab's own and that of third parties, we may use to service all or a substantial number

of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes software and other technology available, which:

1. Provides access to client account data (such as duplicate trade confirmations and account statements);
2. Facilitates trade execution and allocates aggregated trade orders for multiple client accounts;
3. Provides pricing and other market data;
4. Facilitates payment of our fees from our clients' accounts; and
5. Assists with back-office functions, recordkeeping, and client reporting.

Services That Generally Only Benefits WIA

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

These services include:

1. Educational conferences and events;
2. Consulting on technology, compliance, legal, and business needs;
3. Publications and conferences on practice management and business succession; and
4. Access to employee benefits providers, human capital consultants, and insurance providers.

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 Schwab's services benefits us because we do not have to produce or purchase them. They are also not contingent upon us committing any specific amount of business to Schwab in trading commissions. We believe our selection of Schwab as custodian and broker is in the best interests of our clients.

Some of the products, services, and other benefits provided by Schwab benefit WIA and may not benefit our client accounts. Our recommendation or requirement that you place assets in Schwab's custody may be based in part on benefits Schwab provides to us or on our agreement to maintain certain Assets Under Management at Schwab and not solely on the nature, cost, or quality of custody and execution services provided by Schwab.

We place trades for our clients' accounts subject to our duty to seek best execution and our other fiduciary duties. We may use custodians other than Schwab to execute trades for your accounts maintained at Schwab, but this practice may result in additional costs to clients, so we are more likely to place trades through Schwab rather than other custodians. Schwab's execution quality may be different than other custodians.

Brokerage for Client Referrals

WIA does not receive client referrals from any custodian or third party in exchange for using that custodian or third party.

Aggregation and Allocation of Transactions

WIA may aggregate transactions if we believe that aggregation is consistent with the duty to seek best execution for our clients and is consistent with the disclosures made to clients and terms defined in the client's Advisory Service Agreement. No advisory client will be favored over any other client, and each account that participates in an aggregated order will participate at the average share price (per custodian) for all transactions in that security on a given business day.

If we do not receive a complete fill for an aggregated order, we will allocate the order on a pro rata basis. If we determine a pro rata allocation is not appropriate under particular circumstances, we will base the allocation on other relevant factors, as follows:

1. When only a small percentage of the order is executed, with respect to purchase allocations, allocations may be given to accounts high in cash.
2. With respect to sale allocations, allocations may be given to accounts low in cash.
3. We may allocate shares to the account with the smallest order, or to the smallest position, or to an account that is out of line with respect to security or sector weightings, relative to other portfolios with similar mandates.
4. We may allocate to one account when that account has limitations in its investment guidelines, prohibiting it from purchasing other securities that we expect to produce similar investment results and that can be purchased by other accounts in the block.
5. If an account reaches an investment guideline limit and cannot participate in an allocation, we may reallocate shares to other accounts. For example, this may be due to unforeseen changes in an account's assets after an order is placed.
6. If a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, we may exclude the account(s) from the allocation and disgorge any profits. Generally, de minimis allocations do not exceed 5% of the total allocation. Additionally, we may execute the transactions on a pro rata basis.

We will document the reasons for any deviation from a pro rata allocation.

Trade Errors

We have implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole, and we will absorb any loss resulting from the trade error if the error was caused by the

firm. If the error is caused by the broker-dealer, the broker-dealer will be responsible for covering all trade error costs. We will never benefit or profit from trade errors.

We do not routinely recommend, request, or require that you direct us to execute transactions through a specified custodian. Additionally, we typically do not permit you to direct brokerage. We place trades for your account subject to our duty to seek best execution and other fiduciary duties.

ITEM 13 - REVIEW OF ACCOUNTS

Gregory Womack, President/Chief Compliance Officer (“CCO”), reviews accounts on a quarterly basis or more frequently as necessary for Clients. Accounts are reviewed for accuracy, completeness, and suitability. Triggering factors, which may stimulate an additional account review, include, but are not limited to, a change in a family situation; (i.e. birth of a child, death of a spouse, divorce, or marriage); job loss or change; need for principal and/or income; changes in economic conditions; tax considerations; changes in your financial situation; and your request for an additional review of your account. You are urged to notify us of any changes in your personal circumstances, which may affect your risk tolerance or decisions we make regarding your investments.

Client statements, confirmations, and performance reports are furnished to you by various financial institutions with which you transact business, such as broker-dealers, investment companies, trust companies, banks, credit unions, and other investment advisers. The frequency of the reports is determined by each financial institution; however, reports are typically sent to you on a monthly, quarterly, or annual basis. You will receive trade confirmations as well as monthly statements, which reflect all transactions in your account directly from the account custodian.

Financial Planning/Consulting clients (i.e. those who have no assets under management with us in our advisory program) will not receive regular reports from the Firm.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

WIA may enter into written referral agreements with third parties by which the third party may, from time to time, refer clients who may establish accounts and enter into advisory relationships with us. This practice may present a conflict of interest, and the firm does the following to mitigate the conflicts:

WIA pays the third party a referral fee equal to a percentage of investment advisory fees received by us from the referred client. Cash referral fees shall be paid pursuant to a written agreement of which WIA is a party (copy to be maintained at WIA), which will include disclosure of any relationship between the solicitor and WIA, either directly or indirectly. The referral fee may be split between third parties who have jointly participated in referring a client to WIA. The fee to be paid by WIA will be borne entirely by us and there will be no additional fee, cost, or expense to the referred client resulting from the referral agreement.

WIA makes disclosure of such referral arrangements to you, the client, before entering into an Advisory Services Agreement. The solicitor will provide a copy of their Form ADV Part 2A (Brochure) and a copy of the Solicitor Disclosure Document to you at the time of solicitation. A copy of such disclosure document and Client receipt acknowledgement shall also be retained as a part of our records. The solicitor shall be required to execute an affirmative that he/she is not subject to any order or SEC proceeding/order as described in Section 203(3) of the Act. The solicitor is not permitted to offer you any investment advice on behalf of WIA. The solicitor is to be properly registered as a solicitor and follow the requirements under CCR 260.236(c)(2).

WIA tries at all times to put your interests first as part of our fiduciary duty. However, you should be aware that the receipt of additional compensation creates a potential conflict of interest. We will make full disclosure to you to address the conflict of interest.

As disclosed under ITEM 12 – Brokerage Practices, the custodians utilized by WIA make available to us other products and services that benefit us but may not benefit your account. Some of these other products and services assist WIA in managing and administering your account. These include software and technology, which provide access to your account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple Client accounts), provide research, pricing information and other market data, facilitate payment of our fees from your account, and assist with back-office functions, recordkeeping, and client account reporting.

Many of these services may be used to service all or a substantial number of our accounts. The Custodians also make available to WIA other services intended to help us manage and further develop its business enterprise. These services may include consulting, publications, and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the custodians may make available, arrange, and/or pay for these services rendered to us by third parties. The custodians may discount or waive fees, they would otherwise charge, for some of these services or pay all or a part of the fees of a third-party providing these services to WIA.

While as a fiduciary, we endeavor to act in your best interest, our recommendation that you maintain your assets in accounts at these custodians may be based in part on the benefit to us or the availability of some of the foregoing products and services and not solely on the nature, cost, or quality of custody and brokerage services provided by the custodians, which may create a potential conflict of interest.

ITEM 15 - CUSTODY

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

WIA is deemed to have custody of client funds and securities whenever WIA is given the authority to have fees deducted directly from client accounts. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which WIA is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients, or an independent representative of the client, will direct in writing the establishment of all accounts and are therefore aware of the qualified custodian's name, address, and manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. When clients have questions about their account statements, they should contact WIA or the qualified custodian preparing the statement.

When fees are deducted from an account, WIA is responsible for calculating the fee and delivering instructions to the custodian.

WIA is deemed to have custody of clients' funds or securities when clients have standing authorizations with their custodian to move money from their account to a third-party ("SLOA") and, under that SLOA, it authorizes WIA to designate the amount or timing of transfers with the custodian. The SEC has set forth a set of standards intended to protect client assets in such situations, which we follow. We do not have a beneficial interest on any of the accounts with which we are deemed to have Custody where SLOAs are on file. In addition, account statements reflecting all activity on the account(s), are delivered directly from the qualified custodian to each client or the client's independent representative, at least quarterly. You should carefully review those statements and are urged to compare the statements against reports received from us. When you have questions about your account statements, you should contact us, as your Advisor, or the qualified custodian preparing the statement.

ITEM 16 - INVESTMENT DISCRETION

Prior to engaging WIA to provide investment advisory services, you, the client, will enter into a written Advisory Service Agreement with WIA, granting the firm the authority to supervise and direct, on an on-going basis, investments in accordance with your investment objectives and guidelines. You will also execute any and all documents required by the Custodian, so as to authorize and enable WIA sole discretion, without prior consultation with or ratification by you, to purchase, sell, or exchange securities in and for your account. WIA has authority to supervise and direct, on an ongoing basis, your investments in accordance with your investment objectives and guidelines or your written Investment Policy Statement. WIA is authorized, in its discretion and without prior consultation with you, to: (1) buy, sell, exchange, and otherwise trade any stocks, bonds, or other securities or assets; (2) determine the amount of securities to be bought or sold; and (3) place orders with the custodian.

Any limitations to such authority will be communicated by you to WIA in writing.

You may specify in writing the markets or broker-dealers to execute the securities transactions directed by us. In the absence of such specification, we shall employ such broker-dealers and such markets as we, in our sole discretion, shall decide.

We will not, however, employ a broker-dealer affiliated with us without first disclosing the affiliation to you and obtaining your written consent. WIA shall not be liable for any act or omission of any broker-dealer (other than an affiliated broker-dealer employed with your written consent).

You may instruct us in writing not to effect transactions through any particular broker-dealer. Executing securities transactions through such designated broker-dealer, may result in paying higher commissions or other transaction costs, greater spreads, or receiving less favorable net prices on transactions for the account than would otherwise be the case.

ITEM 17 - VOTING CLIENT SECURITIES

WIA may accept authority to vote proxies with respect to securities owned by Clients.

We have adopted proxy voting policies and procedures with respect to securities owned by our Clients for which we have been specifically delegated voting authority and discretion, in accordance with its fiduciary duties, which are reasonably designed to ensure that proxies are voted in the best interest of Clients.

To facilitate our proxy responsibilities (assuming the client has designated WIA), we have contracted with Proxy Trust (proxytrust.com) to vote all proxies on our behalf. Recommendations for voting by Proxy Trust are reviewed by one of our portfolio managers, and any votes contrary to Proxy Trust's recommendations are documented.

The guiding principle by which we vote on all matters submitted to security holders is the maximization of the ultimate economic value of your holdings. We do not permit voting decisions to be influenced in any matter contrary to, or dilutive of, this guiding principle. It is our policy to avoid situations where there is any material conflict of interest or perceived conflict of interest affecting the voting decisions. Any perceived conflict of interest is reviewed by our Chief Compliance Officer.

It is the general policy that we vote on all matters presented to security holders in any Proxy, and these policies and procedures have been designed with that in mind. However, we reserve the right to abstain on any particular vote or otherwise withhold a vote on any matter if, in the judgment of WIA, the costs associated with voting such Proxy outweigh the benefits you or if the circumstances make such an abstention or withholding otherwise advisable and are in your best interest.

You, the client, delegate to WIA the discretionary power to vote the securities held in your account pursuant to written agreement. WIA does not accept any subsequent directions on matters presented to shareholders for a vote, regardless of whether such subsequent directions are from you or a third party.

Upon request, we will provide, separately to each Client, (i) a copy of WIA's proxy voting policies and procedures and (ii) details as to how the firm has voted securities in your account.

ITEM 18 - FINANCIAL INFORMATION

We are not aware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to you.

The adviser has not been the subject of a bankruptcy petition during the past ten years.

WIA does not require prepayment of more than \$500 in fees per client, six months or more in advance, and thus, is not required to provide a balance sheet.

ITEM – 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Please see Form ADV Part 2B, Item 2 regarding the Investment Advisor Representative's formal education and business background. Please see Form ADV Part 2B, Item 4 for information regarding the Investment Advisor Representative's other business activity along with the time spent.

WIA does not assess clients a performance fee. Our firm nor any of our management persons have a relationship or an arrangement with an issuer of securities.

The Firm's Investment Advisor Representatives have not been involved in the following items:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) an investment or an investment-related business or activity;
 - b) fraud, false statement(s), or omissions;
 - c) theft, embezzlement, or other wrongful taking of property;
 - d) bribery, forgery, counterfeiting, or extortion; or
 - e) dishonest, unfair, or unethical practices.

Our Firm maintains a written Business Continuity Plan (BCP). The BCP outlines procedures relating to an emergency or significant business disruption. Our procedures are reasonably designed to enable our Firm or any of its investment advisory representatives to meet their exciting fiduciary obligations to client.

If you have any questions, concerns or require additional information before retaining the services of WIA, you may contact Greg Womack at (405) 340-1717.

All material conflicts of interest under CCR Section 260.238 (k) are disclosed regarding the investment adviser, its representatives, or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.



W O M A C K

I N V E S T M E N T A D V I S E R S

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

Gregory Womack

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Edmond, OK 73013

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www.womackadvisers.com

This Brochure Supplement provides information about Gregory Womack (CRD# 1858242), which supplements the Womack Investment Advisers, Inc. Brochure. You should have received a copy of the Brochure. Please contact Greg Womack, Chief Compliance Officer, if you did not receive Womack Investment Advisers' brochure or if you have any questions about the contents of this supplement.

Additional information about Gregory Womack is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

GREGORY KENT WOMACK, President, CFP*

DOB: February 9, 1963

Education:

Attended Southern Nazarene University, Bethany, OK 1981 – 1982, No degree received

Attended University of Central Oklahoma, Edmond, OK 1984 – 1985, No degree received

Certified Financial Planner (CFP)*

Series 65 (Uniform Investment Advisor Law Examination)

Employment:

GreneCo Holdings, LLC	Partner	2019 – Present
GreneCo Management, LLC	Manager	2019 – Present
Down to Earth Thai Massage, Inc	Officer	2018 – Present
Red Book Publishing Company, Inc	Officer	2018 – Present
G'dub, LLC	Member	2018 – Present
GreneCo, LLC	Affiliate	2017 – Present
SkyEye, LLC	Member	2017 – Present
GW Ranch & Lodge, LLC	Member	2017 – Present
Gemini Natural Resources, LLC	Member	2014 – Present
Triad Capital, LLC	Partner	2014 – Present
Womack Investment Advisers, Inc.	President/CCO	2000 – Present
Four Leaf Clover Investments, LLC	Member	2004 – Present
Womack Advisers, LLC	Member	2003 – Present
Production Brokers, LLC	Officer	2014 – 2021
Conservation Pays, LLC	Member	2014 – 2017
Trinity Global Growth & Income Fund, LP	Partner	2010 – 2017
Trinity Global Partners, LLC	Member	2010 – 2017
Trinity Capital Asset Advisors, LLC	Member	2009 – 2017
Trinity Gold Fund, LP	Partner	2009 – 2017
Trinity Capital Asset Management	Member	2009 – 2017
Constellation Group, Inc.	Officer	2010 – 2016
Cambridge Investment Research, Inc.	Registered Rep	2007 – 2009
Financial Network Advisory Corp.	IA Representative	1994 – 2007
Financial Network Investment Corp.	IA/Registered Rep	1990 – 2007
MetLife Securities, Inc.	Registered Rep	1987 – 1990
Metropolitan Life Insurance Co.	Agent	1987 – 1990

*Minimum Qualifications for the Certified Financial Planner (CFP®) Designation

Accredited by the National Commission for Certifying Agencies, this designation is issued by the Certified Financial Planner Board of Standards, Inc. (CFPBS) and is granted to individuals who meet the following prerequisites: (1) meet the education requirement, (2) possess a bachelor's degree from an accredited college or university, (3) pass the CFP® Certification Examination, (4) have at least three years of full-time work experience in personal financial planning, and (5) pass the CFPBS Fitness Standards for Candidates and Registrants and Background Check. The education requirement can be met by completing a CFPBS registered education program or by applying for challenge status based on certain degrees or credentials. Once the initial CFP® designation is issued, the CFP® holder is required to complete 30 hours of continuing education every two years and must meet other standards administered by the CFPBS.

ITEM 3 - DISCIPLINARY INFORMATION

None

ITEM 4 - OTHER BUSINESS ACTIVITIES

Mr. Womack holds an insurance license to sell limited insurance products through Womack Advisers, LLC. Womack Investment Advisers, Inc. (“WIA”) and Womack Advisers, LLC are separate companies but affiliated by ownership and control. The insurance products may include, but are not limited to, traditional insurance products, such as life and health. It is anticipated that a small portion, less than (10%) of his time, will be spent providing these insurance products. He receives compensation from selling insurance products and therefore receives economic benefit for this activity. Advisory fees are not charged on those assets. This activity may create a conflict of interest with clients. However, since this activity represents less than 10% of his time and income, it is presumed not to be substantial.

You should be aware that a conflict exists between the interests of the Firm and your interests; you are under no obligation to act upon any of the recommendations of Womack Investment Advisers, Inc. (“WIA”), and if you elect to act upon any of our recommendations, you are under no obligation to affect the transaction through the Firm.

Greg Womack may be engaged in public speaking activities through workshops and seminars. He is also the author of the book and small-group study, *Wisdom and Wealth*, which focuses on time-tested wisdom and business knowledge and shows readers how to make wise choices and properly manage finances. Fees are typically received for these activities, and such fees can be paid by program sponsors or through the sale of published materials. Clients of WIA are welcome, but are never obligated, to purchase any product or publication that is available.

Greg Womack is a managing member and partner in GreneCo Holdings, LLC, which owns GreneCo, LLC and GreneCo Management, LLC. GreneCo, LLC is a consulting firm that offers services to landowners and business firms involved in the development and marketing of land investment opportunities. Some of these opportunities may be offered as limited Regulation D Private Placement Rule 506(c) investments and may be sponsored and/or managed by GreneCo, LLC; GreneCo Holdings, LLC may also own a small percentage of some of the entities connected to these investments and, along with its subsidiaries, may also receive compensation directly from issuers or indirectly from managing firms involved in these offerings. Clients of WIA, who qualify as accredited investors, have the opportunity, through each offering’s non-affiliated registered broker-dealer, to invest in these limited offerings in order to receive potential tax-planning benefits. WIA receives no compensation from a client’s participation and does not charge the client an advisory fee for these investments. However, Greg Womack, through his ownership in these entities, will indirectly benefit from investments made by Clients of WIA.

Mr. Womack is a partner of Triad Capital, LLC, which owns interest in ProductionBrokers.com, a website that provides service listings, advertisements, and online auctions for the oil & gas industry. Mr. Womack receives no compensation from these business activities.

Mr. Womack is an investor in Down to Earth Thai Massage, Inc., located in La Jolla, California, which provides spa and massage therapy services and in Red Book Publishing Company, Inc., which publishes phone books and provides yellow pages advertising for rural communities in Central Oklahoma. He also serves as an officer for each company, but he has very little involvement in either company's day-to-day operations.

Mr. Womack owns rental properties and receives rental income from these properties through Four Leaf Clover Investments, LLC.

The estimated time Mr. Womack spends, during non-trading hours, for each of these outside business activities is approximately 10 hours or less, per month.

Mr. Womack is also a managing member of the following companies, which hold his personal assets and property: GW Ranch & Lodge, LLC; G'dub, LLC; and SkyEye, LLC as well as Gemini Natural Resources, LLC, which holds mineral interest and oil & gases leases. His involvement in these companies requires no additional time or commitment.

ITEM 5 - ADDITIONAL COMPENSATION

Mr. Womack does not receive any additional compensation other than as described above.

ITEM 6 - SUPERVISION

Greg Womack is supervised through a compliance program designed to prevent and detect violations of the federal and state securities laws. Supervision is conducted by the Chief Compliance Officer, Greg Womack, who is responsible for administering the policies and procedures. Mr. Womack reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation. All policies and procedures of the firm are observed.

Greg Womack's contact information:

Greg Womack
Chief Compliance Officer
(405) 340-1717
greg@womackadvisers.com

ITEM 7 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Womack has not been involved in an award or has otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) An investment or an *investment-related* business or activity;

- (b) Fraud, false statement(s), or omissions;
- (c) Theft, embezzlement, or other wrongful taking of property;
- (d) Bribery, forgery, counterfeiting, or extortion; or
- (e) Dishonest, unfair, or unethical practices.

Mr. Womack has not been involved in an award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) An investment or an *investment-related* business or activity;
- (b) Fraud, false statement(s), or omissions;
- (c) Theft, embezzlement, or other wrongful taking of property;
- (d) Bribery, forgery, counterfeiting, or extortion; or
- (e) Dishonest, unfair, or unethical practices.

Mr. Womack has not been the subject of a bankruptcy petition.

ITEM 1 – COVER PAGE



W O M A C K
I N V E S T M E N T A D V I S E R S

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

Jeffrey S. Beattie

1366 East 15th Street
Edmond, OK 73013

Office: (405) 340-1717
Fax: (405) 340-6019

www.womackadvisers.com

This Brochure Supplement provides information about Jeffrey Beattie (CRD# 4696733), which supplements the Womack Investment Advisers, Inc. Brochure. You should have received a copy of the Brochure. Please contact Greg Womack, Chief Compliance Officer, if you did not receive Womack Investment Advisers' brochure or if you have any questions about the contents of this supplement.

Additional information about Jeffrey S. Beattie is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Jeffrey S. Beattie

Year of Birth: 1967

Education:

Indiana Wesleyan University Bachelor's Degree Graduation: 1991, 2006
Series 65 (Uniform Investment Advisor Law Examination)

Employment:

CK Investments II, LLC	Member	2019 – Present
West Terre Haute Police Department	Part-time Patrolman	2018 – Present
CK Investments, LLC	Member	2017 – Present
Womack Investment Advisers, Inc.	Portfolio Manager	2006 – Present
Trinity Global Partners, LLC	Member	2010 – 2017
Trinity Global Growth & Income Fund, LP	Partner	2010 – 2017
Trinity Gold Fund, LP	Partner	2009 – 2017
Trinity Capital Asset Management, LLC	Member	2009 – 2017
Trinity Capital Asset Advisors, LLC	Managing Member	2009 – 2017

ITEM 3 - DISCIPLINARY INFORMATION

As of the date of this brochure supplement, Mr. Beattie has not been subject to any material, legal, or disciplinary events, except as follows:

Mr. Beattie voluntarily resigned on 12/20/2002 from the United States Department of Justice - Bureau of Federal Prisons after allegations of fraud or the wrongful taking of property were brought against him. Mr. Beattie was charged (Case #: TH 03-001-CR-ML) with a misdemeanor for making a false statement to obtain federal employees' compensation. On 1/10/2003 Formal Action was brought in Federal Court- Southern District of Indiana, Terre Haute Division. Mr. Beattie pled guilty and complied with conditions and terms of his (A) Pretrial Diversion Program; (B) 1/10/2003; (C) 3 years of probation on Pretrial Diversion (D) Restitution of \$423.66; after which, on 1/15/2006, the case was dismissed.

ITEM 4 - OTHER BUSINESS ACTIVITIES

Mr. Beattie owns rental properties and receives rental income from these properties through CK Investments, LLC and CK Investments II, LLC. He spends less than 10 hours per month, during non-trading hours, on this outside business.

Mr. Beattie also serves part-time (evenings and weekends) as a patrolman for the West Terre Haute Police Department in West Terre Haute, Indiana. He spends approximately 24 hours a month, during non-trading hours only, on this outside activity.

ITEM 5 - ADDITIONAL COMPENSATION

None.

ITEM 6 - SUPERVISION

Jeffrey S. Beattie is supervised through a compliance program designed to prevent and detect violations of the federal and state securities laws. Supervision is conducted by the Chief Compliance Officer, Greg Womack, who is responsible for administering the policies and procedures. Mr. Womack reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation. All policies and procedures of the firm are observed.

Greg Womack's contact information:

Greg Womack
Chief Compliance Officer
(405) 340-1717
greg@womackadvisers.com

ITEM 7 - REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Arbitration Information

As of the date of this brochure supplement, Mr. Beattie has not been involved in any material arbitration or arbitration claim.

Other Awards, Etc.

As of the date of this brochure supplement, Mr. Beattie has not been awarded against or otherwise found liable in any civil, self-regulatory organization, or administrative proceeding except as follows:

Mr. Beattie voluntarily resigned on 12/20/2002 from the United States Department of Justice - Bureau of Federal Prisons after allegations of fraud or the wrongful taking of property were brought against him. Mr. Beattie was charged (Case #: TH 03-001-CR-ML) with a misdemeanor for making a false statement to obtain federal employees' compensation. On 1/10/2003 Formal Action was brought in Federal Court- Southern District of Indiana, Terre Haute Division. Mr. Beattie pled guilty and complied with conditions and terms of his (A) Pretrial Diversion Program; (B) 1/10/2003; (C) 3 years' probation on Pretrial Diversion (D) Restitution of \$423.66; after which, on 1/15/2006, the case was dismissed.

Bankruptcy

As of the date of this brochure supplement, Mr. Beattie has not been the subject of a bankruptcy petition.