

# WCM Wealth Management, LLC

*This brochure provides information about the qualifications and business practices of WCM Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at (210) 684-1071 or by email at: [cwilliams@wcm-texas.com](mailto:cwilliams@wcm-texas.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about WCM Wealth Management, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). WCM Wealth Management, LLC's CRD number is: 154909*

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

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## ITEM 2: MATERIAL CHANGES

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There are material changes in this brochure from the last annual updating amendment on March 31, 2017. Material changes relate to WCM Wealth Management, LLC's policies, practices or conflicts of interests only.

*Item 5 – Fees and Compensation*

This item has been amended to reflect fee billing practices.

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## ITEM 4: ADVISORY BUSINESS

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### A. DESCRIPTION OF THE ADVISORY FIRM

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This firm has been in business since September 2010, and the principal owner is George Christopher Williams.

### B. TYPES OF ADVISORY SERVICES

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WCM Wealth Management, LLC (hereinafter "WCM") offers the following services to advisory clients:

#### INVESTMENT SUPERVISORY SERVICES

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WCM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WCM gathers information about each of our clients including, but not limited to: income, occupation, net worth, liquid net worth, tax levels, current investments and risk tolerance and then selects a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

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

#### FINANCIAL PLANNING

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WCM offers financial planning which may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

#### SERVICES LIMITED TO SPECIFIC TYPES OF INVESTMENTS

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WCM limits its investment advice and/or money management to equities, bonds (municipal, corporate, and government), mutual funds, certificates of deposit, ETFs, real estate, hedge funds, REITs, private placements, and penny stocks. However, WCM may use other securities, as well, to help diversify a portfolio when applicable.

### C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

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WCM tailors its services to its clients based upon the information it gathers from them, as discussed above.

Clients may impose restrictions about investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent WCM from properly

servicing the client account, or if the restrictions would require WCM to deviate from its standard suite of services, WCM reserves the right to end the relationship.

#### D. WRAP FEE PROGRAMS

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WCM does not participate in any wrap fee programs.

#### E. AMOUNTS UNDER MANAGEMENT

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As of December 31, 2017, WCM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:
\$ 55,108,400	\$ 0

### ITEM 5: FEES AND COMPENSATION

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#### A. FEE SCHEDULE

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##### INVESTMENT SUPERVISORY SERVICES FEES

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Total Assets Under Management	Annual Fee
\$0 to \$250,000	2.75%
Next \$250,000	2.50%
Next \$250,000	2.25%
Next \$250,000	2.00%
Next \$1,000,000	1.50%
Above \$2,000,000	Negotiable

These fees are negotiable and the final fee schedule is attached to the Client Agreement. Fees are paid quarterly in advance. One quarter of the annual fee will be charged each period based upon the market value, as reported by the Client's custodian at the end of the last market day of the previous quarter. Fees commence upon managed trading in the Account(s) and will be prorated for any period of less than a calendar quarter.

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##### FINANCIAL PLANNING FEES (FIXED FEES/HOURLY FEES)

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Depending upon the complexity of the situation and the needs of the client, the fixed fee rate for creating client financial plans is between \$500 and \$5,000. The hourly fee rate for these services is between \$150 and \$350. Fees are paid in arrears upon completion. The fees are negotiable and the final fee schedule will be included as part of the Client Agreement.

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## B. PAYMENT OF FEES

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### PAYMENT OF INVESTMENT SUPERVISORY FEES

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Fees are paid quarterly in advance. Clients may select the method in which they are billed.

- Advisory fees may be withdrawn directly from the client's accounts with client written authorization. In cases where WCM fees are directly deducted, WCM will a) Obtain written client authorization and b) Ensure that the custodian will send quarterly statements to the client wherein WCM fees are itemized.
- Advisory fees may be invoiced and billed directly to the client with payments due 45 days after the end of the quarter.

A minimum annual fee of \$1,000 may be waived or decreased at the discretion of WCM.

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### PAYMENT OF FINANCIAL PLANNING FEES

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Financial Planning Fixed Fees/Hourly Fees are paid via check in arrears upon completion of work.

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## C. CLIENTS ARE RESPONSIBLE FOR THIRD PARTY FEES

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The Investment Supervisory Fees discussed above do not include: brokerage commissions, transaction, exchange, wire transfer, electronic fund fees, margin interest or account fees, other fees and taxes on brokerage accounts and securities transactions, or custodial charges, as a third party will handle all custody of assets. These expenses are charged separately. (see Item 12 - Brokerage Practices, below).

Client understands that assets invested in shares of money market funds, mutual funds, ETFs or other investment companies will be included in calculating the value of the assets for purposes of computing WCM's Investment Supervisory fees, and that the same assets will also be subject to the internal expenses of those funds paid to their own investment managers, which are fully disclosed in each fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to WCM's fee, and WCM shall not receive any portion of these commissions, fees, and costs.



## D. TERMINATION AND PREPAYMENT OF FEES

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Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the client agreement. After this time, clients may terminate their contracts with thirty (30) days written notice.

WCM collects fees in advance and in arrears. WCM shall be entitled to be paid its Investment Supervisory Fees through the effective date of termination. Upon termination of these services, any prepaid but not yet earned fees will be refunded to Client on a prorated basis. Fees will be deposited back into client's account within fourteen (14) days.

## E. OUTSIDE COMPENSATION FOR THE SALE OF SECURITIES TO CLIENTS

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One of our employees is licensed as an insurance agent, but he is not currently affiliated with an insurance agency.

This is a conflict of interest because it may provide an incentive to the employee to recommend investment products based upon the compensation received, rather than on the client's needs. When recommending the sale of securities or investment products for which a WCM employee receives compensation, WCM will document the conflict of interest in the client file and inform the client of the conflict of interest. We attempt to mitigate this conflict of interest by providing you with these disclosures and maintaining a Code of Ethics.

Clients always have the option to purchase WCM recommended products through other brokers or agents that are not affiliated with WCM.

## ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

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

## ITEM 7: TYPES OF CLIENTS

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

- Individuals
- High-Net-Worth Individuals
- Pension and profit sharing plans
- Charitable organizations, trusts and/or estates
- Corporations and other businesses

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## MINIMUM ACCOUNT SIZE

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WCM's preferred minimum account size is \$150,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

## ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF INVESTMENT LOSS

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### A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

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WCM employs modern portfolio theory. In modern portfolio theory, certain principles are applied to the historical performance of asset and sub-asset classes, and combinations of classes, to identify asset allocations that attempt to maximize the client's rate of return within the constraints imposed by the client's circumstances and risk tolerance.

In creating these allocations WCM employs a style box approach. Created by Morningstar, a style box is designed to visually represent the investment characteristics of fixed-income (bond), domestic equity (stock) and international equity securities and their respective mutual funds. A style box is a valuable tool used to determine the asset allocation and risk-return structures of portfolios and/or how a security fits into our investing criteria. The style boxes used for equity and fixed-income funds vary slightly.

WCM will utilize individual securities, mutual funds and/or ETFs (as well as, other securities / investments) deemed to correlate with certain asset classes appropriate to each client's portfolio. Portfolios are globally diversified to control the risk associated with traditional markets. WCM's investments may also include: equities, bonds (municipal, corporate, U.S. government), mutual funds, certificates of deposit, ETFs, real estate, hedge funds, REITs, private placements, and penny stocks. However, WCM may use other securities as well to help diversify a portfolio when applicable.

Generally, WCM believes investing should involve a long term view designed to capture market rates of both return and risk. A short term view and frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Thus, our preference for a long term approach.

If utilizing mutual funds or ETFs, these products must meet quantitative and/or qualitative criteria, which may include: a minimum length of track record, minimum performance levels, assets under management, consistency of investment style, employee turn-over, efficiency and capacity. Mutual funds and/or ETFs are reviewed quarterly.

The following sources may be used as research sources: data published by nationally recognized mutual fund or investment manager databases, disclosures made available in mutual fund prospectuses, disclosures contained in investment managers' Form ADVs, and other national business and finance publications. While this due diligence is comprehensive, it

does not provide an independent verification of the performance or rankings of funds that it screens.

## B. MATERIAL RISKS INVOLVED

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**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.** WCM does not guarantee the future performance of an account or any specific level of performance, the success of any investment decision or strategy that WCM may use, or the success of WCM's overall management. Clients understand that investment decisions made for the client's account by WCM are subject to various market, currency, economic, political and business risks, and that those investment decisions will not always be profitable.

## C. RISKS OF SPECIFIC SECURITIES UTILIZED

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

Our investment approach continuously focuses on the risk reward equation inherent in each asset class. Investors face the following investment risks:

- **Interest-rate Risk:** Fixed income securities are subject to interest rate risk because the prices of fixed income securities tend to move in the opposite direction of interest rates. When interest rates rise, fixed income security prices fall. When interest rates fall, fixed income security prices rise. In general, fixed income securities with longer maturities are more sensitive to changes in interest rates. In addition, falling interest rates may cause a portfolio's income to decline.
- **Market Risk:** The price of a security, bond or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When an inflationary economic environment exists, a dollar in the future does not buy as much as a dollar today will buy. This negatively impacts people on fixed incomes.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Financial Risk:** Excessive borrowing to finance the operations of a business increases risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Penny Stocks and Low Priced Stocks**
  - (1) From time to time your advisor may purchase on your behalf certain low priced stocks. These low priced stocks generally are investments in small companies not traded on an exchange or quoted on NASDAQ.
  - (2) Your advisor does not receive any additional form of compensation for the purchase of these stocks.
  - (3) Often times the bid-ask "spread" on these stocks is wide as a percentage of the value of the stock. Your advisor will make reasonable a judgment as to the price offered for the purchase of the stock, on your behalf.
  - (4) The transaction cost for the purchase and sell of these stocks can substantially erode potential gains or increase potential losses. Please ask your advisor to explain the current transaction costs associated with the purchase and sell of low priced stocks.
- **Exchange Traded Funds (ETFs):** Unlike mutual funds, ETFs are traded on stock exchanges or on the over-the-counter market. ETFs generally do not charge initial sales charges or redemption fees and investors typically pay only customary brokerage fees to buy and sell ETF shares. An investment in an ETF generally presents the same primary risks as an investment in a conventional mutual fund that has the same investment objectives, strategies, and policies. The price of an ETF can fluctuate up or down, and a client account could lose money investing in an ETF if the prices of the securities owned by the ETF go down. In addition, ETFs may be subject to the following risks that do not apply to conventional funds:
  - (1) The market price of an ETFs shares may trade above or below their net asset value;
  - (2) An active trading market for an ETF's shares may not develop or be maintained;  
or
  - (3) Trading of ETFs shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the

activation of market-wide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally.

## ITEM 9: DISCIPLINARY INFORMATION

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On or about July 2014, Mr. Compton was named in two multi-party arbitration claims. In both, Claimants’ primary allegation against Mr. Compton was that he failed to supervise another registered representative regarding unsuitable recommendations. However, Mr. Compton was not licensed as a supervisor nor was it his responsibility to supervise the other registered representative. Both matters were settled by the major parties prior to arbitration. One matter was dismissed in its entirety as to Mr. Compton, as to the other, Mr. Compton contributed \$50,000 toward the \$1,054,000 settlement to help resolve the matter and avoid further litigation expenses. Mr. Compton did not receive a copy either settlement agreement.

### A. CRIMINAL OR CIVIL ACTIONS

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There are no criminal or civil actions to report.

### B. ADMINISTRATIVE PROCEEDINGS

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There are no administrative proceedings to report.

### C. SELF-REGULATORY ORGANIZATION (SRO) PROCEEDINGS

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There are no self-regulatory organization proceedings to report.

## ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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### A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

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Mr. Compton is no longer registered with a broker-dealer as a registered representative.

### B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR, OR A COMMODITY TRADING ADVISOR

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Neither WCM nor its representatives are registered as a FCM, CPO, or CTA.

## C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND POSSIBLE CONFLICTS OF INTERESTS

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George Christopher Williams is an accountant and a partner in the accounting firm of Williams, Crow, Mask L.L.P. From time to time, he will offer clients advice or products from those activities. WCM always acts in the best interest of the client. Clients are in no way required to implement the plan through any representative of WCM in their capacity as an accountant.

Kelly Compton is an insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. WCM acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of WCM in their capacity as an insurance agent.

Kelly Compton is also the managing member of Kelly Compton Investments, LLC, a Texas registered investment advisory firm. This firm works exclusively with retirement plans.

## D. SELECTION OF OTHER ADVISORS OR MANAGERS AND HOW THIS ADVISER IS COMPENSATED FOR THOSE SELECTIONS

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WCM does not direct clients to third party money managers.

## ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

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### A. CODE OF ETHICS

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We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

### B. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

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

## C. INVESTING PERSONAL MONEY IN THE SAME SECURITIES AS CLIENTS

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From time to time, representatives of WCM may buy or sell securities for themselves that they also recommend to clients. WCM will always document any transactions that could be construed as conflicts of interest.

## D. TRADING SECURITIES AT/ AROUND THE SAME TIME AS CLIENTS' SECURITIES

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From time to time, representatives of WCM may buy or sell securities for themselves at or around the same time as clients. WCM will trade client's non-mutual funds and non-ETF securities before they trade their own. If the transaction is being executed as a block trade, then a representative's trade may be included.

# ITEM 12: BROKERAGE PRACTICES

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## A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

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We recommend that our clients use Charles Schwab & Co., Inc. or TD Ameritrade, Inc. ("custodians"), registered broker-dealers, members FINRA/SIPC, as the qualified custodians. WCM is independently owned and operated and is not affiliated with the custodians. The custodians will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use these firms as custodian/broker, you will decide whether to do so and will open your account with them by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at these custodians, we can still use other brokers to execute trades for your account as described below.

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

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds [ETFs], etc.)
- Availability of investment research and tools that assist us in making investment decisions

- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, and stability
- Prior service to us and our other clients

For our clients' accounts that the custodians maintain, the custodians generally do not charge you separately for custody services but are compensated by charging commissions or other fees on trades that they execute or that settle into your custodial account. The commission rates applicable to our client accounts were negotiated based the total asset value of client accounts held with the custodian.

In addition to commissions, the custodians charge you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that is executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your custodial account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have your custodian execute most trades for your account. We have determined that having our custodians execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above.

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### 1. RESEARCH AND OTHER SOFT-DOLLAR BENEFITS

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WCM does not have any specific soft dollar arrangements. Our custodians provide us and our clients with access to its institutional brokerage services (trading, custody, reporting, and related services), many of which are not typically available to retail customers. They also makes available various support services. Some of those services help us manage or administer our client accounts, while others help us manage and grow our business. Support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us.

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### 2. BROKERAGE FOR CLIENT REFERRALS

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

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### 3. DIRECTED BROKERAGE

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WCM allows clients to direct brokerage. WCM may be unable to achieve most favorable execution of client transactions if clients choose to direct brokerage. This may cost clients money because without the ability to direct brokerage WCM may not be able to aggregate orders to reduce transactions costs resulting in higher brokerage commissions and less favorable prices.



## B. AGGREGATING (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

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In order to secure certain efficiencies and results with respect to execution, clearance and settlement of orders, WCM in its sole discretion may elect to combine or “bunch” (also known as a block trade) an order entered for clients with orders entered for the same security for other clients of WCM. However, the custodian will compute the commission as if the order entered for the client was not bunched.

WCM in its sole discretion may use the average price at which a security is bought or sold for the clients involved in the transaction when a bunched order is executed in parts at different prices, or when two or more separate orders for the same security are entered at approximately the same time and are executed at different prices. If a bunched order is not executed in its entirety a client may buy or sell less of a security than if the order was not bunched. Similarly when price averaging is used some clients will get a better price and some clients will get a worse price than they would have received if price averaging was not used.

WCM will act in a manner it believes is equitable for its clients as a group when bunching and price averaging.

## ITEM 13: REVIEWS OF ACCOUNTS

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### A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO MAKES THOSE REVIEWS

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Client accounts are reviewed at least quarterly by George Christopher Williams and/or Kelly Compton. George Christopher Williams and Kelly Compton are the chief investment advisors and review client accounts with regard to investment objectives and risk tolerance levels. All accounts at WCM are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by George Christopher Williams and/or Kelly Compton. There is only one level of review and that is the total review conducted to create the financial plan.

### B. FACTORS THAT WILL TRIGGER A NON-PERIODIC REVIEW OF CLIENT ACCOUNTS

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

### C. CONTENT AND FREQUENCY OF REGULAR REPORTS

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At least quarterly, each client will receive from their custodian written statements identifying the amount of funds and of each security in the account at the end of the period and setting forth all transactions in the account during that period. Custodians may provide additional reports.

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

## ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

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### A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES

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WCM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to WCM clients.

### B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR CLIENT REFERRALS

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

## ITEM 15: CUSTODY

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Under government regulations, we are deemed to have custody of your assets because, for example, you authorize us to instruct your custodian to deduct our investment supervisory fees directly from your account. Your custodian maintains actual custody of your assets. You will receive account statements directly from your custodian at least quarterly, but more likely monthly. They will be sent to the email or postal mailing address you provided to them. You should carefully review those statements promptly when you receive them. We also urge you to compare your custodian's account statements to the periodic portfolio reports you may receive from us.

Client accounts are held primarily at Charles Schwab & Co., Inc. and TD Ameritrade, Inc. Member FINRA and SIPC.

## ITEM 16: INVESTMENT DISCRETION

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WCM provides both discretionary and non-discretionary investment supervisory services. In order to implement discretionary investment supervisory services, clients provide WCM discretionary authority via a limited power of attorney in the Client Agreement and in the contract between the client and the custodian. This gives WCM authority over the client's

accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced.

## ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING)

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

## ITEM 18: FINANCIAL INFORMATION

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### A. BALANCE SHEET

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

### B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR

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Neither WCM nor its management has any financial condition likely to reasonably impair our ability to meet contractual commitments to clients.

### C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS

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

## ITEM 19: REQUIREMENTS FOR STATE REGISTERED ADVISERS

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### A. PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS

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WCM's principal executive officer and management person is George Christopher Williams. Kelly Compton is a management person. Their education and business background can be found on the Supplemental ADV Part 2B forms.

### B. OTHER BUSINESSES

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Mr. Williams' and Mr. Compton's other business activities can be found in Item 10 - Other Financial Industry Activities and Affiliations, as well as, the Supplemental ADV Part 2B form.

### C. PERFORMANCE BASED FEES

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

#### D. MATERIAL DISCIPLINARY DISCLOSURES

On or about July 2014, Mr. Compton was named in two multi-party arbitration claims. In both, Claimants' primary allegation against Mr. Compton was that he failed to supervise another registered representative regarding unsuitable recommendations. However, Mr. Compton was not licensed as a supervisor nor was it his responsibility to supervise the other registered representative. Both matters were settled by the major parties prior to arbitration. One matter was dismissed in its entirety as to Mr. Compton, as to the other, Mr. Compton contributed \$50,000 toward the \$1,054,000 settlement to help resolve the matter and avoid further litigation expenses. Mr. Compton did not receive a copy either settlement agreement.

#### E. MATERIAL RELATIONSHIPS WITH ISSUERS OF SECURITIES

Neither WCM, nor its management persons, has any relationship or arrangement with issuers of securities.

## PRIVACY NOTICE

<b>FACTS:</b>	<b>WHAT DOES WCM WEALTH MANAGEMENT, LLC (“WCM”) DO WITH YOUR PERSONAL INFORMATION?</b>
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social security number and income</li> <li>• Assets, account balances and transaction history</li> <li>• Investment experience and risk tolerance</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
<b>How?</b>	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons WCM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does WCM share?	Can you limit this sharing?
<b>For our everyday business purposes</b> — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations or report to credit bureaus	YES	NO
<b>For our marketing purposes</b> — to offer our products and services to you	YES	NO
<b>For joint marketing with other financial companies</b>	NO	WE DON'T SHARE
<b>For our affiliates’ everyday business purposes</b> — information about your transactions and experiences	YES	NO
<b>For our affiliates’ everyday business purposes</b> — information about your creditworthiness	NO	WE DON'T SHARE
<b>For nonaffiliates to market to you</b>	NO	WE DON'T SHARE
<b>Questions?</b>	Call 210-684-1071 and/or <a href="mailto:cwilliams@wcm-texas.com">cwilliams@wcm-texas.com</a>	

Who we are	
Who is providing this notice?	WCM Wealth Management, LLC (referred to as WCM)
What we do	
How does WCM protect my information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does WCM collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• Open an account and enter into an investment advisory contract;</li> <li>• Give us your income, employment and contact information;</li> <li>• Tell us about your investment or retirement portfolio; or</li> <li>• Seek advice about your investments.</li> </ul>
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• WCM is affiliated with Williams, Crow, Mask LLP, an accounting firm.</li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• WCM does not share with nonaffiliates so they can market to you.</li> </ul>
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• WCM doesn't jointly market.</li> </ul>