WEALTH SOLUTIONS, INC.
CROWNBRIDGE WEALTH, LLC

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Form ADV Appendix Part 2A- Wrap Fee Brochure

February 28, 2019

This Brochure provides information about the qualifications and business practices of Wealth Solutions, Inc. If you have any questions about the contents of this Brochure, please contact us at 512-600-9880 or via email at info@wealthsolutionsria.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.

Wealth Solutions, Inc. is a Registered Investment Adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information that you may use to determine whether to hire or retain them. Additional information about Wealth Solutions, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Since our last annual updating amendment, we have the following change:

- We have moved office locations.
- The firm's new address is 1317 Picadilly Drive, Suite B-202, Pflugerville, TX 78660

Currently, our Brochure may be requested at any time, without charge, by contacting Wealth Solutions, Inc. at 512-600-9880. Additional information about Wealth Solutions, Inc. is also available via the SEC's website www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as CRD number. The CRD number for Wealth Solutions, Inc. is 35331. The SEC's web site also provides information about any persons affiliated with Wealth Solutions, Inc. who are registered, or are required to be registered, as Investment Adviser Representatives of Wealth Solutions, Inc.

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Item 4 – Services, Fees and Compensation

Wealth Solutions, Inc. is a Registered Investment Adviser ("Adviser") which offers investment advisory services. Wealth Solutions, Inc. through an affiliated entity, Crownbridge Wealth, LLC, offers financial planning and related consulting services. We are registered through and regulated by the Texas State Securities Board.

We provide investment advice through Investment Adviser Representatives ("Advisor") associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf. In addition, all advisors are required to have a college degree, professional designation, or equivalent professional experience.

Wealth Solutions, Inc. was founded in 1993 by Richard Blair who serves as President and Chief Compliance Officer. We provide portfolio management services to individuals, high net worth individuals, and business entities. We are committed to the precept that by placing the client's interests first, we will add value to the asset management process and earn the client's trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

As of 12/31/2018 we provided asset management services for 3405 accounts, managing total assets of $60,000,000. We provided discretionary asset management services for 3225 accounts, managing a total of $59,000,000 and non-discretionary asset management services for 180 accounts managing a total of $1,000,000.

Services

We provide asset management services to individuals and businesses. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We currently offer our Wrap fee program, Wealth Solutions Elite Portfolio Series through E*TRADE Advisory Services.

Accounts are managed on a discretionary basis, which means you have given us the authority to determine the following with/without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account
- Broker-dealer to be used for a purchase or sale of securities for your account

While we may have trading discretion on your account (i.e., placing trades in your account without your approval), trading activity is generally limited to help minimize your trading costs. Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professional to assist you with tax planning. You will have the opportunity to meet with us periodically to review the assets in your account.

1. Asset Management

Asset management is the professional management of securities (stocks, bonds and other securities) in order to meet your specified investment goals. With an Advisory Account, you engage us to assist you in developing a personalized asset allocation program designed to meet your unique investment objectives. The investments in the portfolio account may include mutual funds, stocks, bonds, ETFs, closed end funds, etc.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information. Based on the information you share with us, we will analyze your situation and recommend an appropriate asset allocation or investment strategy. You will be provided with a targeted strategic allocation of assets by class. We will monitor the account, trade as necessary, and communicate regularly with you. We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account. You will also receive our Advisory Agreement which describes what services you will receive and what fees you will be charged.

We will:

- Review your present financial situation
- Monitor and track assets under management
- Provide portfolio statements, asset allocation statement, rebalanced statements as needed
- Advise on asset selection
- Determine market divisions through asset allocation models
- Provide research and information on performance and fund management changes
- Build a risk management profile for you
- Maintain your asset allocation policy in your portfolio on a continual basis
- Monitor your portfolio for style drift and benchmark performance, and provide portfolio rebalancing as necessary
- Assist you in setting and monitoring goals and objectives
- Provide personal consultations as necessary upon your request or as needed.

You must notify us promptly when your financial situation, goals, objectives, personal circumstances, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

We may recommend specific positions to increase/decrease sector or asset class weightings. Wealth Solutions may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. Wealth Solutions may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend E*TRADE Advisory Services or uses Folio Institutional as the independent custodian for all accounts that we manage, and at the request of the client will utilize the services of a different custodian of the client's choice.

You will enter into a separate custodial agreement with the custodian. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

We will also provide you with a quarterly performance statement starting at the end of the first full calendar quarter after signing the Client Advisory Agreement. These statements give you additional feedback regarding performance, educate you about our long-term investment philosophy, and describe any changes in current strategy and allocation along with the reasons for making these changes.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

2. Fees and Compensation

A wrap fee program ("bundled") allows you to pay a specified fee for portfolio management services and the execution of transactions. The fee is not based directly upon transactions in your account. The fee is bundled with our costs for executing transactions in your account(s).

Since the Adviser does not charge Clients higher advisory fees based on trading activity, the Adviser may have an incentive to limit trading activities in Client account(s) because the Adviser is charged for executing trades. In addition, the amount of compensation received by the Adviser may be more than what the Adviser would receive if the Client paid separately ("unbundled") for investment advice, brokerage, and other services. Therefore, the Adviser and Richard Blair may have a financial incentive to recommend the wrap fee program over other programs or services. The Adviser monitors all Client accounts to ensure that the Adviser's fiduciary duty is met for all Clients. Any breaches of the Adviser's fiduciary duty are noted and appropriate repercussions are initiated to deter such behavior.

By participating in a wrap fee program, Clients may end up paying more or less than they would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to the Client by the executing broker. Clients could also invest in debt and equities directly, without the Adviser's services. In that case, Clients would not receive the services provided by the Adviser which are designed, among other things, to assist in determining which funds are appropriate for the portfolio and the Client's Account.

There are other fees that Clients may be charged by other parties. In our wrap fee program, we include all trade charges for your account. However, our fees do not include other related costs and expenses. You may incur certain charges imposed by custodians, and other third parties. These include fees charged by managers, custodial fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge.

You could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives.

Our Advisory-Agreement defines what fees are charged and their frequency. We bill fees in arrears on a quarterly basis. You will authorize the custodian to directly debit fees from your account held at the custodian and to pay us. Management fees are prorated for each contribution and withdrawal made during the applicable calendar quarter (with the exception of small inconsequential contributions and withdrawals). You will be provided with a quarterly statement reflecting deduction of the advisory fees.

Either party may terminate the relationship at any time. Upon termination of any account, any fees that are due, but have not been paid, will be billed to you and are due immediately.

Asset Management Fee Schedule

Our minimum account opening balance is $1,000 which may be negotiable based upon certain circumstances. The fee charged is based upon the amount of money you invest. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged quarterly, in arrears. Fees will be calculated on the average daily balance of the previous quarter, will be billed within the first two weeks of the quarter and will be calculated per the fee schedule as follows:

Percentage	Portfolio Size (AUM)
1.60%*	Up to $500,000
1.20%**	$500,001 - $750,000
0.80%**	Over $750,000

* A 0.20% fee will be added for accounts utilizing the Folio platform. Additional Folio fees may apply. Please review your Folio Institutional Agreement for complete terms and conditions.

** A 0.15% fee will be added for accounts utilizing the Folio platform. Additional Folio fees may apply. Please review your Folio Institutional Agreement for complete terms and conditions

The fees shown above are annual fees and may be negotiable based upon certain circumstances. You will generally be billed one fourth of this amount on a quarterly basis.

No increase in the wrap fee shall be effective without prior written notification to you. We believe our wrap fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

In certain circumstances, advisory fees and account minimums may be negotiable based upon prior relationships as well as related account holdings. Our fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of your funds.

Certain strategies offered by us involve investment in mutual funds. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as “12(b)(1) fees”. These 12(b)(1) fees come from fund assets, and thus indirectly from clients’ assets. We do not receive any compensation from these fees. E*TRADE Advisory Services receives the fee and reduces the custodial fees charged to us. The 12(b)(1) fee, deferred sales charges and other fee arrangements will be disclosed upon your request and are typically described in the applicable fund’s prospectus.

Your account at the custodian may also be charged for certain additional assets managed for you by us but not held by the custodian (i.e. variable annuities, mutual funds, 401(k)s).

Item 5 – Account Requirements and Types of Clients

We require an initial minimum account size opening balance of $1,000. The account size may be negotiable based upon the individual circumstances. Participation in the wrap fee program generally is initiated by submitting a completed account application, portfolio management agreement, and questionnaire.

The Adviser provides portfolio management services to individuals, high net worth individuals, trusts, estates, corporations, trusts, endowments, non-profits and small business owners. Several factors may influence the selection of the account structure including but not limited to:

- The Client's preference for a wrap vs. transaction charges per trade on certain or all securities;
- Account size;
- Anticipated trading frequency;
- Anticipated securities to be traded;
- Management style; and
- Long term investment goals.

Item 6 – Portfolio Manager Selection and Evaluation

Richard Blair serves as the portfolio managers for all Client accounts for the wrap fee program.

He reviews performance information provided through the Custodian.

With respect to the wrap program, the Client has the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction requested.

If such investment restrictions are implemented, the Client will experience a different investment return than what will be realized by the particular model itself. Such performance may be better or worse than the particular model. For these reasons, if a Client wishes to make a request concerning restrictions based on specific securities, it may be more appropriate for the Client to participate in other portfolio management programs. It should be noted, any standardized reports of model performance will not reflect the performance of the particular model with restrictions applied. However, performance reports of the Client's account will accurately reflect the Client's actual account performance with restrictions.

1. Methods of Analysis, Investment Strategies and Risk of Loss

We may use fundamental analysis and/or technical analysis as part of our overall investment management discipline. We use these method(s) of analysis to determine asset class, region, sector, industry, suitability, and maximum desired allocation for each security selected.

We focus on utilizing these methods of analysis when scrutinizing general economic conditions and geopolitical actions, current market conditions, interest rates and yield curves, inflation trends and market volatility, sector valuations and relative asset class valuations, and taxation concerns. In some instances, we utilize a “bottom-up investing” strategy, and focus on the analysis of individual stocks rather than economic and market cycles.

The implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security’s value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

Once we discover undervalued securities or funds that are investing in undervalued stocks; we look at the stability and volatility.

Technical Analysis

Technical Analysis is a technique that attempts to determine a security or asset class’s value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market’s price reflects all relevant information so the analysis focuses on the history of a security’s trading behavior rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act upon relevant information rather than focusing on the information itself. Ultimately, technical analysts develop trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future return.

In order to perform this fundamental analysis, we use many resources, such as:

- Proprietary In house Research
- Third Party research
- Nationally recognized statistical rating organizations
- Morningstar
- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings with the Securities and Exchange Commission

- Research materials prepared by others
- Company press releases
- Inspections of corporate activities.

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days
- Short sales

2. Risks

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to handle. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of risks associated with the strategies, products and methodology we offer are listed below:

1. Bond Fund Risk

   Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

   - Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
   - Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
   - Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
   - Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

2. Fundamental Analysis Risk

   Fundamental analysis, when used in isolation, has a number of risks:

   - When using this method with mutual funds, the funds are composed of many companies and not all of them will be undervalued
   - The data used may be out of date.
   - It is difficult to give appropriate weightings to the factors.
   - It assumes that the analyst is competent.
   - It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
   - It assumes that there is no monopolistic power over markets.

3. Mutual Funds Risk

   The following is a list of some general risks associated with investing in mutual funds.

   - Country Risk - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
   - Currency Risk -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
   - Income Risk - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
   - Industry Risk - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
   - Inflation Risk - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
   - Manager Risk -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
   - Market Risk -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
   - Principal Risk -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

4. Overall Fund Risk

   - Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.
   - Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

   While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

5. Stock Fund Risk

   Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

6. Technical Analysis risk

   - Technical analysis is derived from the study of market participant behavior and its efficacy is a matter of controversy.
   - Methods vary greatly and can be highly subjective; different technical analysts can sometimes make contradictory predictions from the same data.
   - Models and rules can incur sufficiently high transaction costs.

3. Performance-Based Fees and Side-by-Side Management

The Adviser does not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a Client. The Adviser does not perform side-by-side management.

4. Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and does not vote proxies on behalf of Clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We are authorized to instruct the custodian to forward you copies of all proxies and shareholder communications relating to your account assets. Further, the Adviser will not be required to take any action or render any advice with respect to any securities held in the Account, which are named in or subject to class action lawsuits. The Adviser will, however, forward to the Client any information the Firm receives regarding class action legal matters involving any security held in the Account and discuss such information if the Client so desires.

Item 7 – Client Information Provided to Portfolio Managers

The Adviser has access to all Client information obtained by the Adviser with respect to the particular Client accounts that they manage. The Adviser does not provide Client information to any other portfolio managers.

Item 8 – Client Contact with Portfolio Managers

The primary point of contact for Clients with respect to this wrap fee program is Richard Blair. Clients are always free to directly contact Richard Blair with any questions or concerns they have about their portfolios or other matters.

Item 9 – Additional Information

1. Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management.

While a principal of the broker-dealer, on September 29, 2009 the United States Securities and Exchange Commission initiated an action against the Registrant's Principal, Richard Blair, alleging that Mr. Blair violated sections 17(a)(2) and 17(a)(3) of the Securities Act, Section 206(2) of the Advisers Act, Sections 15(c)(3)(a) and 17(a)(1) of the Exchange Act and Rules 15c3-1, 17a-3(a) and 17a-11 there under. The allegation stated that the Registrant convinced customers to surrender variable annuities and repurchase new variable annuities twice within an 18 month period beginning in late 2004 while representing that the cost of the transactions would be minimal. The two transactions cost customers about 11% of the total principal under investment, while the Registrant received $208,347 in commissions. Additionally, the SEC alleged that Mr. Blair caused the Registrant to maintain inaccurate books and records and operate with a net capital deficiency in January and February 2007. The Registrant and Mr. Blair, without admitting or denying the allegations, settled the matter by agreeing to be censured, to cease and desist the complained of activities and paying a $25,000 fine. The firm created a spreadsheet of the 17 clients affected. The spreadsheet showed the cost of the surrender charges, the payments of bonuses clients received that were either recaptured or immediately vested upon surrender of the contracts. Also included were market gains the clients received during the time period in question. This analysis showed 16 of the 17 clients benefited from the exchanges. After consultation with council, we agreed that the monetary costs of a trial and the potential interruption of my staff by continuing to defend the complaint would not be beneficial for my staff nor my clients.

While a Principal of the broker-dealer, in December 2010, FINRA initiated an action against the Registrant's Principal, Richard Blair which was settled in June 2012. The allegations stated that the Principal failed to notify FINRA of a civil action that was filed by a vendor concerning commission advances in a timely manner, failed to disclose these advances as a liability on the firm's books and records, and failed to timely disclose six customer complaints. The events in question occurred in 2009. The firm had an outsourced FINOP who failed to properly account for the commission advances in the general ledger. The firm has also retained the services of an outside compliance consultant who disagreed with FINRA's assessment of the customer complaints which they viewed as customer service related and not actual complaints. In addition, they failed to update FINRA concerning a disagreement with a vendor regarding commission payments. This matter was settled to avoid additional legal expenses and Richard Blair did not admit or deny the allegations. Mr. Blair was fined $7,500 by FINRA.

In 2012, the TSSB initiated an inquiry relating to BD and RIA sales to clients of COLE REIT shares that occurred between 2009-2012. There were never any issues relating to the suitability of the approximately 50 clients who received all of the Issuer's disclosure documents. In addition, the REIT resulted in realized profits for all clients. The COLE prospectus described two offering options. One for BD's and one another for RIA's BD sales had an offering price of $10 per share with a 7% commission being paid by the issuer to the BD. In other words, if the client purchased $25,000 of shares at $10 per share, that entire principle amount was applied to the share purchase. The RIA sales were based on a price of $9.30 per share, but the investors would be subject to his/her advisor's annual management fees, custodian expenses, etc. COLE confirms that 96% of all sales were effected through BD's TSSB investigators insisted that Blair's prior sales of COLE should have been made through the RIA at a price of $9.30, Notwithstanding the fact that the firm did not have a selling agreement with COLE on behalf of the RIA. No client ever complained about this investment. Blair, his retained compliance experts and counsel provided an analysis establishing that over the long term holding of this investment, clients would have incurred higher annual management fees and custodial costs that would have offset their paying the higher initial purchase price ($10 versus $9.30). During the inquiry, it was determined that Blair had inadvertently charged certain clients a management fee during the same quarter that the firm had received selling commissions. The firm immediately offered to reimburse said clients for the overcharge of the advisory fee. TSSB insisted that the firm was obligated to return all clients the BD sales commissions. TSSB refused to accept any compromise and filed a complaint. Blair opposed the complaint and filed a motion to mediate this dispute which was granted by the SOAH administrative law judge and mediation was subsequently held. The mediation was successfully concluded with the parties agreeing to a client reimbursement in the amount that the TSSB demanded, a reprimand, and undertaking to complete the reimbursement process by a set time and retain a consultant to review the firm's procedures involving RIA conflicts.

In June 2013, FINRA initiated an inquiry relating to BD and RIA sales to clients of COLE REIT shares that occurred between 2009-2012, U-4 inconsistencies and failure to file a customer complaint. Upon the advice of his attorney, Richard Blair did not file the customer complaints as they were ultimately dismissed. There were never any issues relating to the suitability of the product. The COLE prospectus described two offering options. One for BD's and one another for RIA's BD sales had an offering price of $10 per share with a 7% commission being paid by the issuer to the BD. In other words, if the client purchased $25,000 of shares at $10 per share, that entire principle amount was applied to the share purchase. The RIA sales were based on a price of $9.30 per share, but the investors would be subject to his/her advisor's annual management fees, custodian expenses, etc. COLE confirms that 96% of all sales were effected through BD's. No client ever complained about this investment. Blair, his retained compliance experts and counsel provided an analysis establishing that over the long term holding of this investment, clients would have incurred higher annual management fees and custodial costs that would have offset their paying the higher initial purchase price ($10 versus $9.30). Blair also inadvertently charged certain clients a management fee during the same quarter that the firm had received selling commissions. The firm immediately offered to reimburse said clients for the overcharge of the advisory fee. On March 17, 2015, FINRA's Hearing Panel indicated that FINRA's Department of Enforcement did not prove by a preponderance of the evidence that Blair violated FINRA rules with regard to failure to disclose material information regarding the sale of the COLE REIT shares. The Hearing Panel did conclude that Blair failed to disclose two customer complaints on his Form U4. However, his attorney at the time advised that these complaints were not reportable and should not be reported. Should he become a registered representative of a FINRA member firm, he will be suspended in all capacities for four months, and fined $17,500.

In October 2015, FINRA initiated a Revocation. Pursuant to FINRA Rule 8320, Richard Blair's FINRA registration is revoked for failure to pay fines and/or costs. Should he become a registered representative of a FINRA member firm, he will be required to pay fines and/or costs.

In April 2016, Arkansas initiated a Cease and Desist Order from further violations of Arkansas Securities Act until he is properly registered with the Department. Richard Blair was not registered with the Aransas Securities Department as required by the Arkansas Securities Act and Rules of the Arkansas Securities commissioner and transacted business with Arkansas residents exceeding the de minimis exception.

2. Other Financial Industry Activities and Affiliations

The investment adviser representatives of Wealth Solutions have the following outside business activities and/or affiliations to disclose.

Broker-Dealer Relationship

Wealth Solutions, Inc. is not affiliated or associated with any Broker-Dealer.

Neither Wealth Solutions, Inc. nor its representatives are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Insurance Agent

Certain of the Adviser's representatives, in their individual capacities, are licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. In their role as an insurance agent/broker, they may offer commissionable (non-variable) insurance products to you for which they may receive compensation from insurance companies. The recommendation by representatives for the purchase of an insurance product may present a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from the Adviser's representatives. Clients are reminded that they may purchase securities or insurance products recommended by Wealth Solutions, Inc. through other, non-affiliated broker-dealers or insurance agents.

3. Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Accounts

We may recommend securities to you that we have purchased for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices
- Participating in Client accounts

You may request a copy of the firm's Code of Ethics by contacting Richard Blair.

Personal Trading

We have established the following restrictions in order to ensure our fiduciary responsibilities to you are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of Wealth Solutions, Inc., unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.
- Neither Wealth Solutions, Inc. nor any related person recommends, buys, or sells for client accounts, securities in which the Adviser or any related person of the Adviser has a material financial interest.

- The Adviser and/or representatives of the Adviser *may* buy or sell securities that are also recommended to clients. This practice may create a situation where the Adviser and/or representative of the Adviser are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation may create a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market prices which follow the recommendation) could take place if the Adviser did not have adequate policies in place to detect such activities. The Adviser has policies and procedures in place to monitor personal securities transactions for the detection of potential abusive practices.

- We emphasize your unrestricted right to decline to implement any advice rendered.

However, some securities trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with our records as required.

In addition, open-end mutual funds and/or investment sub-accounts which may comprise a variable insurance product are purchased or redeemed at a fixed net asset value. Therefore, purchases of mutual funds and/or variable insurance products by an advisor are not likely to have an impact on the prices of the fund in which you invest. These types of transactions are not prohibited by our policies and procedures.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade order (specifying each participating account) and its allocation. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

Wealth Solutions, Inc. has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects; provided, however that at any time that the Adviser has only one Access Person, he or she shall not be required to submit any securities report described above.

Responsibility

It is the responsibility of all supervisory personnel to ensure that we conduct business with the highest level of ethical standards and in keeping with our fiduciary duties to you. We must put your interests first and refrain from having outside interests that conflict with your interests.

Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

Conflicts of Interest

Wealth Solutions, Inc. representatives may employ the same strategy for personal investment account as they do for clients. However, orders will not be placed in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

4. Brokerage for Client Referrals

We may receive additional compensation for sales of insurance products only.

5. Review of Accounts

Reviews will be conducted by us at least quarterly or as agreed to by us. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

Reports

You will be provided with account statements reflecting the transactions occurring in the account on at least a quarterly basis. These statements will be written or electronic depending upon what you selected when you opened the account. You will be provided with paper confirmations for each securities transaction executed in the account. You are obligated to notify us of any discrepancies in the account(s) or any concerns you have about the account(s).

6. Client Referrals and Other Compensation

We do not receive any compensation for referring clients to another advisor nor do we pay any compensation to another advisor if they refer clients to us.

We may receive an economic benefit from E*TRADE Advisory Services. Wealth Solutions, Inc. without cost (and/or at a discount), may receive support services and/ or products from E*TRADE Advisory Services.

You do not pay more for investment transactions effected and/or assets maintained at E*TRADE Advisory Services as a result of this arrangement. There is no corresponding commitment made by Wealth Solutions, Inc. to Trust Company or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as a result of the above arrangement.

7. Financial Information

We do not solicit fees of more than $500, per client, six months or more in advance. We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings.

8. Discretion

We may receive discretionary authority from you at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. Prior to Wealth Solutions, Inc. assuming discretionary authority over your account, you will execute an Investment Advisory Agreement, authorizing us as your attorney and agent in fact, granting us the full authority to buy, sell, or otherwise effect investment transactions involving the assets in your name found in the discretionary account. In all cases, however, this discretion is exercised in a manner consistent with your stated investment objectives for your account.

Clients who engage Wealth Solutions, Inc. on a discretionary basis may, at any time, impose restrictions, in writing, on our discretionary authority (i.e. limit the types / amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe our use of margin, etc.)

When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions you have set. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Item 10 – Requirements for State Registered Advisers

Firm Principals

There is one principal of Wealth Solutions, Inc., Richard D Blair is President, CCO, and CIO. Mr. Blair was born in 1968. His information is as follows:

Part A

Education

B.S., Business Administration	1991
University of Houston, Houston, TX	
Masters of Science in Financial Services	2016
Institute of Business & Finance, San Diego, CA	

Business History

1993 – Present	Principal, President, and CCO at Wealth Solutions, Inc.

Part B

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Mr. Blair is not affiliated with a broker-dealer. Mr. Blair is a licensed insurance agent and devotes approximately 15% of his time to this activity.

Part C

We do not charge a performance-based fee (fee based on a share of capital gains on, or capital appreciation of, the assets of a client) for asset management accounts.

Part D

Neither Wealth Solutions, Inc. nor Richard Blair has been the subject of any disciplinary actions, other than as previously disclosed in this brochure under Item 9.

Part E

Neither Wealth Solutions, Inc. nor Richard Blair has any relationship with any issuer of securities.