

Item 1 – Cover Page  
**FORM ADV PART 2A**

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**January 2015**

**This brochure provides information about the qualifications and business practices of Wilkins Miller Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (251) 410-6700 and/or [gbowen@wmhwealthmgt.com](mailto:gbowen@wmhwealthmgt.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 Wilkins Miller Wealth Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Wilkins Miller Wealth Management, LLC is 162222.**

**Any references to Wilkins Miller Wealth Management, LLC as a registered investment adviser or its related persons as registered advisory representatives does not imply a certain level of skill or training.**

**Item 2 - MATERIAL CHANGES**

January 2015

Item 4 – Updated Assets Under Management

January 9, 2014	\$30,500,000 of discretionary	\$2,200,000 non-discretionary
January 6, 2015	\$41,200,000 of discretionary	\$2,760,000 non-discretionary

Firm name changed from Wilkins Miller Hieronymus Wealth Management, LLC to Wilkins Miller Wealth Management, LLC.

Accounting firm name changed from Wilkins Miller Hieronymus, LLC to Wilkins Miller, LLC.

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At least annually, this section will discuss only specific material changes that are made to the Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to this Brochure will be provided.

The material changes discussed above are only those changes that have been made to this brochure since the firm’s last annual update of the brochure. The date of the last annual update of the brochure was January 26, 2015.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our fiscal year, which is December 31st. We may further provide other ongoing dis-closure information about material changes as necessary.

Additionally, we will further provide you with a new brochure as necessary based on change or new information, at any time, without charge.

Our brochure may be requested free of charge by contacting Greg Bowen at (251) 410-6700 and/or [gbowen@wmhwealthmgt.com](mailto:gbowen@wmhwealthmgt.com). Additional information about Wilkins Miller Wealth Management, LLC is also available via the SEC’s website [www.adviser.sec.gov](http://www.adviser.sec.gov). The website also provides information about any persons affiliated with Wilkins Miller Wealth Management, LLC who are registered, or are required to be registered, as investment adviser representatives of Wilkins Miller Wealth Management, LLC.

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#### **Item 4 - ADVISORY BUSINESS**

Wilkins Miller Wealth Management, LLC (hereinafter referred to as “WM Wealth Management”) is an investment advisory firm offering a variety of advisory services customized to your individual needs.

- A. WM Wealth Management was established in November 2008 and is owned by ten individuals. No individual owns more than 25% of WM Wealth Management.
- B. WM Wealth Management offers the following advisory services. Each of the services is more fully described below.
  - Asset Management
  - Financial Planning

#### **Asset Management Services**

WM Wealth Management offers asset management services that includes determining an asset allocation based upon the individual needs of the client. WM Wealth Management will provide continuous and ongoing management of your account and will determine changes to the allocation of the account and implement or execute the changes.

WM Wealth Management asset management program provides a disciplined approach to the investment process. Offering a personalized solution for investing based on each client’s unique goals, time horizon and risk tolerance. Features of the platform include:

1. Quarterly performance reporting.
2. Personalized Investment Policy Statements (IPS).
3. Customized asset allocation strategy.
4. Asset allocation strategy implementation utilizing a diverse mix of exchange traded funds (ETFs), mutual funds, stocks and bonds and structured investments.
5. Systematic account rebalancing.

The management criteria of your account will be outlined in a Investment Policy Statement, or (IPS). The Investment Policy Statement will document your investment goals and objectives. Further, the investment policy statement will:

1. Document guidelines you have indicated to be followed in managing your account
2. Document the manner in which your portfolio is to be implemented
3. Document the importance of ongoing portfolio monitoring and review

WM Wealth Management primarily allocates client investment assets among various exchanged traded funds (ETF's) and open ended mutual funds. The mutual funds used are no load or load waived and purchased at net asset value (NAV). However, managed accounts are not exclusively limited to ETF's and mutual funds and may include individual stocks, bonds, money market funds, certificates of deposit and structured investments as deemed appropriate based on the client's financial situation, goals and risk tolerance. Structured investments

consist primarily of Principle Protected Notes (PPN's) and Buffered Return Enhanced Notes (BREN's).

Transactions in the account, account reallocations and rebalancing may trigger a taxable event, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts.

WM Wealth Management will provide continuous and ongoing management of your account. Unless otherwise expressly requested by you, WM Wealth Management will manage the account on a discretionary basis and will make changes to the allocation as deemed appropriate. WM Wealth Management will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. WM Wealth Management may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter term periods. Discretionary authority will be granted by you to WM Wealth Management by execution of the Asset Management agreement.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement. However, WM Wealth Management will periodically rebalance your account to maintain the initially agreed upon asset allocation. WM Wealth Management does not deem rebalancing as a form of discretion.

### **Financial Planning Services**

WM Wealth Management offers broad-based and modular financial planning services. Financial planning services will typically involve providing a variety of services, principally advisory in nature, to clients regarding the management of their financial resources based upon an analysis of the client's individual needs. WM Wealth Management may use financial planning software to assist in determine the client's current financial position and define and quantify long term goals and objectives. The financial planning software will run hypothetical scenarios based on variables to assist a client to determine a course of action.

A financial plan will analyze the following areas:

- **Personal:** family records, budgeting, personal liability, estate information and financial goals
- **Tax and Cash Flow:** Income tax and spending analysis and planning for past, current, and future years. WM Wealth Management will illustrate the impact of various investments on your current income tax and future liability.
- **Death and Disability:** Cash needs at death, income needs of the surviving dependents, state planning and disability income analysis
- **Retirement:** Analysis of current strategies and investment plans to help you work toward retirement goals
- **Investments:** Analysis of investment alternatives and their potential effect on a client's portfolio.
- **Estate Planning:** Advice with respect to property ownership, distribution of strategies, disposition of business interest, estate tax reduction, and tax payment

techniques as well as discussion of gifts, trusts, etc. Further, a review of death and disability issues will be examined. Tax consequences and their implications are identified and evaluated.

WM Wealth Management will schedule a meeting with you and present the analysis of your situation and recommendations for steps to be taken to assist you to work toward financial goals.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to WM Wealth Management. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. WM Wealth Management cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify WM Wealth Management promptly of the changes. You are advised that the advice offered by WM Wealth Management may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through WM Wealth Management or Advisory Representatives. Should you implement the plan with WM Wealth Management's Advisory Representatives, commissions or other compensation may be received in addition to the advisory fee paid to WM Wealth Management.

In formulating the financial plan, WM Wealth Management will consider only the financial products offered through Purshe Kaplan Sterling Investments. As a result, the financial plan may not be comprehensive because WM Wealth Management may not recommend use of financial products that otherwise might be appropriate investments but that not offered through Purshe Kaplan Sterling Investments.

### **General Information**

You are advised the investment recommendations and advice offered by WM Wealth Management are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform WM Wealth Management promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify WM Wealth Management of any such changes could result in investment recommendations not meeting your needs.

- C. WM Wealth Management tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on the investing in certain securities or types of securities.

Wilkins Miller Wealth Management, LLC

Understanding our clients' goals, time horizon and risk tolerance is critical to the successful development and implementation of an investment strategy. Below is a general outline of our process:

Meeting	Purpose	Issues Address
1	Determine if there is a fit.	<ul style="list-style-type: none"> <li>- What type of assistance does the client need?</li> <li>- What is important to the client?</li> <li>- Introduction to our planning and investment process.</li> <li>- If there is a fit, review next steps and delivery Document Checklist.</li> </ul>
2	Discovery	<ul style="list-style-type: none"> <li>- Gather relevant client data.</li> <li>- Understand client objectives.</li> <li>- Complete risk tolerance question.</li> </ul>
3	Proposal	<ul style="list-style-type: none"> <li>- Revisit objectives, risk tolerance and time horizon.</li> <li>- Introduce proposal strategy.</li> <li>- Review proposal IPS.</li> <li>- Review to Implementation.</li> </ul>
4	Implementation	<ul style="list-style-type: none"> <li>- Revisit proposal and address any questions.</li> <li>- Obtain approval to proceed with implementation.</li> </ul>
5	Review	<ul style="list-style-type: none"> <li>- Meet regularly to review and update strategy.</li> </ul>

The number and frequency of meetings will vary depending on individual client circumstances and the complexity of the planning issues involved. WM Wealth Management will ask you to complete a fact finder or data gathering questionnaire to assist with obtaining information about your financial situation and history. Additionally, WM Wealth Management will meet with you and conduct an interview and data gathering session to continue the due diligence process. The information gathered will assist WM Wealth Management in providing you with customized services that are tailor to your unique financial situation. Depending on the services you have requested, WM Wealth Management will gather various additional financial information and history from you including, but not limited to:

- Retirement and financial goals
- Investment objectives
- Investment horizon
- Financial needs
- Cash flow analysis
- Cost of living needs
- Education needs
- Savings tendencies
- Other applicable financial information required by WM Wealth Management in order to provide the investment advisory services requested.

D. WM Wealth Management does not participate in any wrap fee programs.

- E. As of January 6, 2015 we have approximately \$41,200,000 of discretionary assets under management and \$2,760,000 of non-discretionary assets under management.

## Item 5 - FEES AND COMPENSATION

### Asset Management Services

- A. Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds.

You may make additions to the Account or withdrawals from the Account, provided the Account continues to meet minimum account size requirements. No fee adjustments will be made during the quarter in which deposits or withdrawals are made unless the advisory relationship is terminated.

Account Size	Annual Fee
\$0 to \$1,000,000	1.50%
\$1,000,000 to \$2,500,000	1.25%
\$2,500,000 to \$5,000,000	1.00%
Over \$5,000,000	0.75%

WM Wealth Management aggregates or households all of your managed accounts together to determine your quarterly fee.

WM Wealth Management may change the above fee schedule upon 30-days prior written notice to you.

- B. Advisory fees will generally be collected directly from your account, provided you have given WM Wealth Management written authorization. You will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not contain sufficient funds to pay advisory fees, WM Wealth Management has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Alternatively, you may elect to pay account management fees directly by check.
- C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by WM Wealth Management and are charged by the product, broker/dealer or account custodian. WM Wealth Management does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with WM Wealth Management and are compensation to the fund-manager.

- D. Advisory fees will be charged in advance of each calendar quarter. The quarterly advisory fee will be based on the value of the Account on the last business day of the just completed calendar quarter. Fees for partial calendar quarters will be prorated. The initial quarterly fee will be a pro-rated portion of the fee based on the number of days remaining in the calendar quarter.
- E. Certain Advisory Representatives of WM Wealth Management are dually registered representatives of Purshe Kaplan Sterling Investments. (“PKS”), a registered broker/dealer, member of the Financial Regulatory Association (FINRA) and SIPC.

If you elect to implement investment advice received from WM Wealth Management through WM Wealth Management Advisory Representatives, such advice can be implemented on a fee basis through WM Wealth Management or on a commission basis through Purshe Kaplan Sterling Investments. WM Wealth Management Advisory Representatives will receive a portion of the fee and/or commission. This practice presents a conflict of interest and gives WM Wealth Management and its Advisory Representatives an incentive to recommend investment products based on the compensation received rather than on a client’s needs.

Advisory Representatives of who are Registered Representatives may receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through Purshe Kaplan Sterling Investments. Load and no-load mutual funds may pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. 12b-1 fees may be initially paid to Purshe Kaplan Sterling Investments and a portion passed to the Advisory Representatives. The receipt of such fees could represent an incentive for the Advisory Representatives to recommend funds with 12b-1 fees over funds that have no fees or lower fees. As a result, there is a potential conflict of interest. However, 12b-1 fees will not be paid to Advisory Representatives on any transactions conducted in a client’s managed account.

These practices present a conflict of interest and gives WM Wealth Management an incentive to recommend investment products based on the compensation received, rather than on a client’s needs. WM Wealth Management will attempt to mitigate conflicts of interest by:

- Informing you of conflict of interest in this Disclosure Brochure.
- Maintaining and abiding by our Code of Ethics which requires us to place your interest first and foremost.
- Routine review of transactions
- Advising you of the right to decline to implement our recommendations and the right to choose other financial professionals for implementation.
- Recognizing and advising you WM Wealth Management is a fiduciary and has an obligation to conduct its business in the best interest of its clients and not in WM Wealth Management’s interest.

You may purchase the securities recommended by WM Wealth Management directly or through other brokers or agents not affiliated with WM Wealth Management.

## Wilkins Miller Wealth Management, LLC

The primary source of compensation for Advisory Representatives is from the sale of investment products recommended to clients, including asset based distribution fees from the sale of mutual funds.

### Termination Provisions

You may terminate investment advisory services obtained from WM Wealth Management, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with WM Wealth Management. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the Account such as transaction fees for any securities transactions executed and Account maintenance or custodial fees. Thereafter, you may terminate investment advisory services with 30-days written notice to WM Wealth Management. Should you terminate investment advisory services during three month period, you will be issued a pro-rated refund of the advisory fee from the date of termination to the end of the three month period.

### **Financial Planning Services**

You are advised that fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Fees are negotiable. Your fees will be dependent on several factors including time spent with WM Wealth Management, number of meetings, complexity of your situation, amount of research, services requested and staff resources. Planning cases involving a client with a net worth over \$5,000,000 with complex estate and planning issues will expect to pay a higher fee closer to the high end of the fee schedule. Clients with a simple plan and isolated planning issues will pay a fee at the lower end of the fee schedule. Clients will be provided a quote of a fee prior to execution of an agreement or any work being performed.

<b>Fee Type</b>	<b>Maximum Fee</b>	<b>Payable</b>
Fixed Fee	\$500 to \$15,000	Payable one-half (1/2) upon execution of the advisory agreement with WM Wealth Management and the balance due at the time of presentation of the plan, unless otherwise negotiated with you.
Hourly Fee	\$100 to \$400 per hour	Hourly fees rates are based on the person performing the task. Administrative and para-planning fees will be billed at a lower rate.  Payable at the end of each month based upon time spent by WM Wealth Management.

### Termination Provisions

You may terminate advisory services obtained from WM Wealth Management, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with WM Wealth Management. Thereafter, you may terminate investment advisory services with 30-days written notice to WM Wealth Management. You will be responsible for any time spent by WM

Wealth Management. Refunds of prepaid fees will be calculated based on time spent multiplied by the hourly rate.

#### **Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT**

This section is not applicable to WM Wealth Management since WM Wealth Management does not charge performance based fees.

#### **Item 7 - TYPES OF CLIENTS**

WM Wealth Management's services are geared toward individuals both high net worth (i.e. clients with a net worth of \$1,500,000) and other than high net worth as well as pension and profit sharing plans or other retirement plans.

WM Wealth Management generally requires a minimum amount of assets be deposited to an account for the purpose of obtaining asset management services. This minimum is generally \$100,000 in cash or securities. However, under certain circumstances, WM Wealth Management may waive the minimum account size requirement and accept accounts less than \$100,000. Such circumstances may include but not be limited to additional assets will soon be deposited or you have other accounts under management with WM Wealth Management. You are advised performance may suffer due to difficulties with diversifying smaller accounts and due to risk controls potentially being compromised. Performance of smaller accounts may vary from the performance of accounts with more dollars invested due to fluctuations in the market may affect smaller accounts more and the effects of compounding may be greater in larger accounts.

#### **Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

- A. WM Wealth Management's investment philosophy is based on concept of diversification and is implemented through the principles of Modern portfolio theory (MPT). MPT attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. This selection of asset classes and the amount invested in each is known as the strategic asset allocation.

WM Wealth Management implements the client's asset allocation primarily through the use of various exchanged traded funds (ETF's) and open ended mutual funds. However, if deemed appropriate, based on the individual client's objectives, risk tolerance and time horizon, other investment products including individual stocks, bonds, money market funds, certificates of deposit and structured investments may be used. Structured investments consist primarily of Principle Protected Notes (PPN's) and Buffered Return Enhanced Notes (BREN's).

- B. WM Wealth Management emphasizes that investment returns, particularly over shorter time periods, can be highly volatile and are dependent on a wide variety of factors. Thus, our

investment management services are generally suitable only for long-term investment objectives or strategies, rather than for short-term trading purposes. Neither diversification nor asset allocation assure a profit or protect you against a loss, and there is no guarantee that your investment objectives will be achieved.

You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by WM Wealth Management will require you to be prepared to bear the risk of loss and fluctuating performance. Risks include:

- **Interest rate risk:** Fluctuations in interest rates may cause investment prices to fluctuate.
- **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.
- **Inflation risk:** The risk is that the rate of inflation will exceed the rate of return on an investment.
- **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 potentially lower rates of return (i.e. interest rate).
- **Business risk:** These risks are associated with a particular industry or a particular company within an industry.
- **Liquidity risk:** Liquidity is the ability to readily convert an investment into cash.
- **Counter Party risk:** The risk that an entity in which a party to a transaction is unable to fulfill their obligations.
- **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.
- **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.
- **Credit Risk:** The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.
- **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.
- **Industry Risk:** The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Manager Risk:** The possibility that an actively managed mutual fund or ETF's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.

WM Wealth Management does not represent, warrant or imply that the services or methods of analysis used by WM Wealth Management can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or

crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by WM Wealth Management will provide a better return than other investment strategies.

- C. WM Wealth Management primarily uses exchange traded funds (ETF's) and no load or load waived mutual funds. The risks include:

*Mutual Funds*

- **Manager Risk:** which is the risk that an actively managed mutual fund's investment adviser will fail to execute the fund's stated investment strategy.
- **Market Risk:** which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- **Industry Risk:** which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- **Inflation Risk:** which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

*Exchange Traded Funds (ETFs)*

ETFs trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index.

*Structured Investments*

*Principal Protected Investment (PPI)*

Principal-protected investments (PPIs) combine some of the features of a fixed income security, such as return of principal at maturity, with the potential for capital appreciation that you get from a diversified portfolio. They are designed to protect against loss of principal at maturity, while providing the opportunity to participate in the gains on a diversified investment. Depending on the specific offering, PPIs may offer full upside participation or an amount greater or less than the full upside. In all cases, investors forgo dividends and interest. PPIs most often mature within three- to five-years, and must be held until maturity to return the full principal amount. Generally, PPIs are issued as notes or CDs in \$1,000 denominations and can be linked to a variety of underlying assets, including an equity index, a marketable ETF, a basket of equities, commodities or currencies. Due to the gains of PPIs being reported as ordinary income, many tax-sensitive investors hold PPIs in tax-deferred accounts.

*Buffered Return Enhanced Note (BREN)*

A Buffered Return Enhanced Note (BREN) can provide partial downside protection while offering potential enhanced upside capital appreciation. The specific terms and conditions of each BREN vary, but they are typically linked to the performance of a particular market index, such as the S&P 500™ Index, Russell 2000 Index and the MSCI EAFE Index. They are issued as senior unsecured debt obligations and mature within one to two years. BRENS feature a "buffer" that provides partial principal protection. Through the use of options, BRENS can pay investors as much as 200% of the return of the underlying benchmark index. Unlike a direct

investment in an index, however, investors forgo any dividend or interest income and are subject to a cap or maximum on potential upside gains. A BREN with a 10% buffer, for example, will return an investor's entire principal if the index has declined by 10% or less at maturity. However, if index losses exceed 10%, the investor will begin to lose principal. In order to provide leveraged or enhanced returns, BRENs include a cap on the maximum return. If the market index rises dramatically, investors will forgo gains beyond the cap. If the market declines dramatically, the majority of capital would be at risk. Any gains on a BREN are taxed as long-term capital gains. Therefore, they may be more suitable for tax sensitive investors than Principal Protected Investments if held in a taxable account. In addition to the general investment risk outline above, structured investments have additional risk factors, including lack of liquidity and credit risk.

**Lack of Liquidity:** The notes may not be listed on any securities exchange. The issuer may offer to purchase the notes in the secondary market but is not required to do so. Even if there is a secondary market, it may not provide enough liquidity to allow you to trade or sell the notes easily. Because other dealers are not likely to make a secondary market for the notes, the price at which you may be able to trade your notes is likely to depend on the price, if any, at which the issuer is willing to buy the notes.

**Credit Risk:** The notes are unsecured obligations of the issuer and are therefore subject to the credit risk of the issuer. In addition the credit rating and the credit spreads of the issuer may adversely affect the market value of the notes. Investors are dependent on issuer's ability to pay all amounts due on the notes at maturity, and therefore investors are subject to our credit risk and to changes in the market's view of our creditworthiness. Any decline in our credit ratings or increase in the credit spreads charged by the market for taking our credit risk is likely to affect adversely the value of the notes. If the issuer were to default their payment obligations, you may not receive any amounts owed to you under the notes and you could lose your entire investment.

To qualify to use structured products, the account value is at least \$100,000 and the client's investment time horizon must be intermediate or long. No more than 30% of your portfolio may be allocated to structured investments. In addition, no more than 10% of your portfolio may be allocated to any single Buffered Return Enhanced Note (BREN) offering. The percentage allocated to each asset class within the portfolio type will be proportionately reduced by the percentage of the portfolio allocated structured products.

These are some of the primary risks associated with the way we recommend investments to you, please do not hesitate to contact us to discuss these risks and others in more detail. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request at any time WM Wealth Management will direct the client to the appropriate Web page to access the prospectus.

No investment strategy can avoid loss. Investing in securities involves risk of loss that you need to be prepared to bear.

### **Item 9 - DISCIPLINARY INFORMATION**

Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of WM Wealth Management or the integrity of our services. There is no reportable disciplinary information required for WM Wealth Management or its management persons that is material to your evaluation of WM Wealth Management, its business or its management persons.

### **Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

- A. As previously stated, certain Advisory Representatives are dually registered as advisory representatives of WM Wealth Management and as registered representatives of Purshe Kaplan Sterling Investments. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if you choose to implement the plan, commissions may be earned in addition to any fees paid for advisory services. Commissions may be higher or lower at PKS than at other broker/dealers. Advisory Representatives may have a conflict of interest in having you purchase securities and/or insurance related products through PKS in that the higher their production with PKS the greater potential for obtaining a higher pay-out on commissions earned.

Under the rules and regulations of the FINRA, PKS has an obligation to perform certain supervisory functions regarding certain activities engaged in by advisory representatives who are also registered representatives of PKS. For such supervisory functions, WM Wealth Management may pay PKS a portion of the advisory fees they receive. PKS and WM Wealth Management are not affiliated.

- B, C. The owners of WM Wealth Management are also owners of Wilkins Miller, LLC an accounting firm. Certain advisory representatives and owners of WM Wealth Management are certified public accounts and offer accounting services through Wilkins Miller, LLC. Clients are not obligated to participate in accounting services through Wilkins Miller, LLC.

WM Wealth Management is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, WM Wealth Management is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

WM Wealth Management attempts to mitigate the conflicts of interest with the potential receipt of commissions if recommendations are implemented by providing you with these disclosures. Further, you are encouraged to consult other professionals and may implement recommendations through other financial professionals. Furthermore, as registered

representatives with PKS, those Advisory Representatives are subject to a supervisory structure at PKS for their securities business.

WM Wealth Management and its management persons are not actively engaged in any other business. Further, WM Wealth Management does not have a related person who is a: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

- D. As stated under Item 4, *Advisory Business* above, WM Wealth Management recommends other investment advisers (i.e. third party managers) and will receive a portion of the fee charged to you by the investment adviser. Since WM Wealth Management has an interest in the compensation this is considered a material conflict of interest. WM Wealth Management selects third party managers based on several criteria including cost, type of management, past history, ability to meet a need and provide a unique service. Since the fee charged to you is based on the value of your portfolio, all parties have an incentive to work toward performance goals and objectives. Consequently, if the third party manager does not adequately manage your account and the value of your portfolio goes down, so does the third party manager's and WM Wealth Management's compensation.

## **Item 11 - CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code Of Ethics**

- A. WM Wealth Management has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. WM Wealth Management takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as WM Wealth Management's policies and procedures. Further, WM Wealth Management strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such information and provides you with WMH Wealth WM Wealth Management's Privacy Policy. As such, WM Wealth Management maintains a code of ethics for its Advisory Representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, WM Wealth Management's Code of Ethics establishes WM Wealth Management's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.
- B. Neither WM Wealth Management nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.

- C. WM Wealth Management and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, WM Wealth Management and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. WM Wealth Management and its associated persons will not put their interests before your interest. WM Wealth Management and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. WM Wealth Management is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

## **Item 12 - BROKERAGE PRACTICES**

As previously stated, certain Advisory Representatives are registered representatives of PKS. As a result they are subject to FINRA Conduct Rule 3040 which may restrict them from conducting securities transactions away from PKS unless PKS provides them with written authorization.

Advisory Representatives have obtained approval to offer you the ability to maintain accounts and for WM Wealth Management to manage client accounts at Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a registered broker/dealer, member SIPC. WM Wealth Management is independently owned and operated and not affiliated with PKS or Schwab.

Not all investment advisers require you to maintain accounts at a specific broker/dealer. You may maintain accounts at another broker/dealer. However, the services provided by WM Wealth Management will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from WM Wealth Management.

In initially selecting PKS and **Schwab**, WM Wealth Management conducted due diligence. WM Wealth Management's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to WM Wealth Management
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness

## Wilkins Miller Wealth Management, LLC

- Other factors that may bear on the overall evaluation of best price and execution

Additionally, periodically WM Wealth Management will review transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

There is an incentive for WM Wealth Management and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest. Therefore, clients may pay commissions higher than those charged by other broker/dealers in return for the products and services received by WM Wealth Management and/or its Advisory Representatives. The products and services WM Wealth Management and its Advisory Representatives receive from the broker/dealer or account custodian will be used to benefit all clients including those clients who elect to maintain their accounts elsewhere.

PKS has a wide range of approved securities products for which PKS performs due diligence prior to selection. PKS's registered representatives are required to adhere to these products when implementing securities transactions through PKS. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer. PKS also provides Advisory Representatives, and therefore the WM Wealth Management, with back-office operational, technology, and other administrative support. Other services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. Such services are intended to help Advisory Representatives and WM Wealth Management manage and further develop its business enterprise.

### PKS

PKS also makes available to WM Wealth Management other products and services that benefit WM Wealth Management but may not directly benefit you. Some of these other products and services assist WM Wealth Management with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of WM Wealth Management's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of WM Wealth Management's accounts, including accounts not held through PKS.

### Schwab

#### *Your Brokerage and Custody Costs*

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab's commission rates applicable to our client accounts were negotiated based on the condition that our clients collectively maintain a total of at

least \$10 million of their assets in accounts at Schwab. This commitment benefits you because the overall commission rates you pay are lower than they would be otherwise. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab 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.

*Products and Services Available to Us From Schwab*

Schwab Advisor Services™ (formerly called Schwab Institutional®) is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab. If our clients collectively have less than \$10 million in assets at Schwab, Schwab may charge us quarterly service fees of \$1,200. Following is a more detailed description of Schwab’s support services:

*Services That Benefit You.*

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

*Services That May Not Directly Benefit You.*

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

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

*Services That Generally Benefit Only Us.*

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

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- 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 of our personnel.

#### *Our Interest in Schwab's Services*

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services and not Schwab's services that benefit only us. We have over \$10 million in client assets under management, and we do not believe that recommending our clients to collectively maintain at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

Due to the individual management of client accounts, we do not aggregate the purchase or sale of securities for various client accounts.

#### **Item 13 - REVIEW OF ACCOUNTS**

- A. If you are participating in the Asset Management, you will be invited to participate in at least an annual review or as agreed by you and your Advisory Representative. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Your Advisory Representative will monitor for changes or shifts in the economy, changes to the management and structure of a mutual fund or company in which your assets are invested, and market shifts and corrections.

If you are participating in Financial Planning Services you will not receive regular reviews. WM Wealth Management recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

## Wilkins Miller Wealth Management, LLC

The following individuals conduct reviews:

Greg Bowen, Member & Advisory Representative

Frank Brown, Member & Advisory Representative

- B. You must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.
- C. You will be provided statements at least quarterly direct from the account custodian. Additionally, you will receive confirmations of all transactions occurring direct from the account custodian. You should compare the report with statements received direct from the account custodian. Should there be any discrepancy the account custodian's report will prevail.

### **Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION**

- A. Product vendors recommended by WM Wealth Management may provide monetary and non-monetary assistance with client events, provide educational tools and resources. WM Wealth Management does not select products as a result of any monetary or non-monetary assistance. The selection of product is first and foremost. WM Wealth Management's due diligence of a product does not take into consideration any assistance it may receive. Therefore, this is not considered a conflict of interest but a benefit for you and WM Wealth Management.
- B. WM Wealth Management does not directly or indirectly compensate any person who is not a supervised person of WM Wealth Management for referrals.

### **Item 15 - CUSTODY**

With the exception of deduction of WM Wealth Management's advisory fees from your accounts, WM Wealth Management does not take custody of your funds or securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

### **Item 16 - INVESTMENT DISCRETION**

You may grant WM Wealth Management authorization to manage your account on a discretionary basis. Discretionary authority will give WM Wealth Management the authority to buy, sell, exchange and convert securities within your managed accounts subject to constraints imposed with the Investment Policy Statement. You will grant such authority to WM Wealth Management by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by WM Wealth Management.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) WM Wealth Management requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of WM Wealth Management's advisory fees from the account, if you have authorized automatic deductions, WM Wealth Management will not have the ability to withdraw your funds or securities from the account.

### **Item 17 - VOTING CLIENT SECURITIES**

WM Wealth Management does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact WM Wealth Management about questions you may have an opinions on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

### **Item 18 - FINANCIAL INFORMATION**

- A. WM Wealth Management will not require you to prepay more than \$500 and six or more months in advance of receiving the advisory service.
- B. As stated above, WM Wealth Management has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of WM Wealth Management's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- C. Neither WM Wealth Management nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

**Item 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS**

The formal education and business backgrounds of the principal executive officers and management persons are disclosed on the attached Supplements.

WM Wealth Management is not actively engaged in any other business. Other businesses in which the principal executive officers and management persons are actively engaged are disclosed on the attached Supplements.

The principal executive officers and management persons have not been involved in any of the following.

An event involving an arbitration claim alleging damages in excess of \$2,500 involving:

- An investment or an investment related activity;
- fraud, false statement(s), or omissions;
- theft, embezzlement, or other wrongful taking of property;
- bribery, forgery, counterfeiting, or extortion; or
- dishonest, unfair, or unethical practices.

An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- an investment or an investment-related business or activity;
- fraud, false statement(s), or omissions;
- theft, embezzlement, or other wrongful taking of property;
- bribery, forgery, counterfeiting, or extortion; or
- dishonest, unfair, or unethical practices.

WM Wealth Management does not have any relationship or arrangement with any issuer of securities.