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### **Introduction**

Wolff Financial Management, LLC ("WFM") is registered with the Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](http://Investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

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### **What investment services and advice can you provide me?**

WFM provides personalized wealth management and financial planning services. The firm provides financial advice to individuals, trusts, charitable organizations, and corporations. WFM requires each client to place at least \$500,000 with the firm, but maintains the discretion to waive this minimum.

### **Financial Planning**


Our financial planning process is focused on the client first. We begin with an initial meeting to gather information, and ask questions we believe help us get to the heart of why the client is coming to us for assistance: what they want their money to do for them, not what performance returns they are seeking. These underlying motivational factors may not always be quantitative, but are as important as a number such as age or years to retirement, as they help us find the client's true goals. The second meeting (and in some circumstances a third) is designed to show the client what WFM believes should be the client's path towards their goals. In some cases the client receives a written deliverable plan document. In cases where the needs and circumstances are simpler, a written deliverable may not be merited.

### **Asset Management**


Each client who engages WFM for wealth management services is required to complete a financial plan of some degree, as WFM believes a thorough plan is the cornerstone to meeting the client's needs. When we perform asset management services, we will do so on a discretionary basis. This means that while we will continue an ongoing relationship with each client, being involved in various stages of their lives and decisions to be made, but we will not seek specific approval of changes to client accounts, provided the changes keep the accounts within stated investment objectives and guidelines provided by the client. Clients can place reasonable restrictions on the management of their accounts and make deposits or withdrawals in their accounts at any time. Because we take discretion when managing accounts, clients engaging us will be asked to execute a Limited Power of Attorney (granting us the discretionary authority over the client accounts) as well as an Investment Management Agreement that outlines the responsibilities of both the client and WFM. In very limited circumstances, we may provide investment management services on a non-discretionary basis, which means we will manage the clients' accounts as we do for our discretionary clients, except we will consult with the client prior to implementing any investment recommendation. Clients should be aware that some recommendations may be time-sensitive, in which case recommendations not implemented because we are unable to reach a non-discretionary client may not be made on a timely basis and therefore client's account may not perform as well as it would have had WFM been able to reach the client for a consultation on the recommendation.

The Wolff Financial Management Wrap Program (the "Program") is a wrap fee program sponsored by Wolff Financial Management LLC which has been in business since April, 2016. For some clients, WFM may include certain transactional costs in the client's management fee. This arrangement is referred to as a "Wrap Program". For accounts in the Wrap Program, WFM pays a fee to the custodian based on the clients' transaction costs. Fees in the wrap program include transaction costs for the purchase or sale of securities, but do not include expenses related to the use of margin, wire transfer fees, the fees charged to shareholders of mutual funds or ETFs, mark-ups and mark-downs, spreads, odd-lot differentials, fees charged by regulatory agencies, and any transaction fees for securities trades executed by a broker-dealer other than the agreed upon custodian. Expenses for the management fees of third party managers are also not included in the Wrap Program, and to the extent utilized, you will be responsible for such fees. Because WFM will be managing the assets of wrap fee program clients the same way as other non-wrap fee program clients, the use of external portfolio managers within the wrap program is expected to be limited. To the extent a third party manager is utilized, the fees payable to such managers will not be included in the wrap program. Therefore, there is no difference between how WFM manages wrap free accounts and how WFM manages other accounts.

For more detailed information, please refer to our Disclosure Brochure, the ADV Part 2A, under Item 4 Advisory Business and Item 7 Types of Clients.

 *"Given my financial situation, should I choose an investment advisory service? Why or why not?"*

 *"How will you choose investments to recommend to me?"*


 *"What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?"*

#### **What fees will I pay?**

WFM provides investment management and ongoing financial planning services for an annual fee based upon a percentage of the assets being managed by WFM. This asset based fee typically varies between 0.00% and 1.50% depending on the amount of assets under management as well as the complexity of the financial planning and service needs of the given client. Fees are negotiable, and may be higher or lower than this range, based on the nature of the account. Factors affecting fee percentages include the size of the account, complexity of asset structures, and other factors. Financial planning is performed as part of asset management services, and not on a stand-alone basis. Accordingly, there is no separate fee. For clients whose assets are managed by the firm, investment advisory fees will be debited directly from the designated client account. The advisory fee is paid quarterly, in advance, and the value used for the fee calculation is the gross value as of the last market day of the previous quarter.

There are several other fees that can be associated with holding and investing in securities. Clients are responsible for fees including transaction fees for the purchase or sale of a mutual fund and commissions for the purchase or sale of a stock or bond. Mutual fund expenses are not included in management fees because they are deducted from the value of the shares by the mutual fund manager. Clients participating in the wrap fee program will not pay transaction fees.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more specific information regarding our fees, please refer to our disclosure brochure, the ADV Part 2A under Item 5 Fees and Compensation.

 *"Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"*

#### **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. At this time WFM does not have any conflicts to disclose.

For more specific information regarding our fees, please refer to our disclosure brochure, the ADV Part 2A under Item 5 Fees and Compensation.


 *"How might your conflicts of interest affect me, and how will you address them?"*

#### **How do your financial professionals make money?**

Financial professionals of WFM are paid a portion of the asset management/planning fees collected from clients. Financial professionals are not rewarded sales bonuses.

#### **Do you or your financial professionals have legal or disciplinary history?**


No. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS).

 *"As a financial professional, do you have any disciplinary history? For what type of conduct?"*

#### **Additional Information**

Additional information about our investment advisory services can be found at <https://www.wfminvest.com/>. A copy of our *relationship summary* can also be requested by calling (269) 372-3100.

 *"Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?"*

 *"Who can I talk to if I have concerns about how this person is treating me?"*



= Conversation starter. You may consider asking your financial professional these questions.