

WEALTHVISORS

FIRM BROCHURE

Part 2A of Form ADV

WEALTHVISORS LLC

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This firm brochure (“brochure”) provides information about the qualifications and business practices of WealthVisors LLC. If you have any questions about the contents of this brochure, please contact us at (888) 285-9580 or by e-mail at info@wealthvisors.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.

Any reference to the advisory services refers to WealthVisors LLC. Registration as a Registered Investment Adviser (RIA) does not imply a certain level of skill or training.

Additional information about WealthVisors LLC is also available on the SEC’s website www.adviserinfo.sec.gov or WealthVisors’ website at www.wealthvisors.com.

November 2, 2018

Item 2 | **Material Changes**

This is the first Form ADV Part 2A brochure published since the inception of WealthVisors LLC.

There are no material changes to report at this time.

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Item 4 | **Advisory Business**

General Description of Advisory Firm

WEALTHVISORS LLC is a Virginia limited liability company newly formed in 2018, and is referred to as “WealthVisors,” “WV,” and “Investment Advisor” within this brochure. The principal control person of our firm is Tyler Chianelli, who serves as the Chief Investment Officer and Chief Compliance Officer.

WealthVisors LLC is a wholly owned subsidiary of Wealth Interests, LLC (Wealth Interests). Wealth Interests is a Virginia limited liability company formed in 2018 and acts as the holding company for WealthVisors. Tyler Chianelli is the sole member and 100% owner of Wealth Interests, LLC.

WealthVisors provides portfolio management services to its clients (individually, a “Client”). We provide discretionary investment advisory services to separately managed accounts and charge one all-inclusive fee for these services. WV tailors its investment advisory services to the individual needs of the client. A majority of our investment advisory services are performed on a discretionary basis in accordance with the client’s “My Investor Plan™” that is mutually developed at inception. Clients are permitted to enforce restrictions on the Investment Advisor of not trading certain securities or asset classes upon commencement of the relationship and these conditions will be included in the client’s “Individual Investor Analysis” to formulate the client’s *My Investor Plan™*.

Assets under Management: WealthVisors currently does not manage any assets on a discretionary basis.

Advisory Services

WealthVisors offers ongoing portfolio management services on a discretionary basis, to private individuals and institutional clients, such as corporations, charitable organizations, trusts, partnerships, and pension plans.

Portfolio Management Services

WealthVisors conducts an Individual Investor Analysis, which summarizes the client’s current financial situation (income, tax levels, investment capital, and risk tolerance) and then develops a plan (My Investor Plan) to assist in the selection of a portfolio that matches each client’s specific circumstance. Our portfolio management services include, but are not limited to:

- » Conduct Individual Investor Analysis and develop investment strategy
- » Ongoing discretionary investment management
- » Quarterly portfolio rebalancing
- » Regular portfolio monitoring
- » Tax optimization and tax loss harvesting, as applicable
- » Access to designated licensed financial advisor(s)
- » Portfolio personalization, as applicable
- » Derivative trading strategies, as applicable
- » U.S. equity portfolio distribution, as applicable
- » Implementation of the client’s *My Investor Plan*

WealthVisors provides investment advisory services based on each client’s individual financial situation often confirmed by accounts that clients have linked through WealthVisors’ financial aggregation service. In addition,

WealthVisors will obtain detailed information regarding personal circumstances such as age, investment time horizon, risk tolerance, expectations, goals, investment restrictions, experience, income situation, and other investor suitability measures to build a custom investment plan tailored to the client.

Clients can engage WealthVisors to manage all or a portion of their assets on a discretionary basis. As detailed in Item 5, WV primarily allocates client assets among different passive and active investment strategies through our two core human advisory services: *WEALTHVISOR*[®] *Signature* and *OPTIONVISOR*[™] *Specialized*. These may take the form of long-short, long-only or other trading strategies based on the client's investment objectives and risk profile. Strategies implemented by WealthVisors are primarily comprised of individual equity securities, mutual funds, bonds or exchange traded funds ("ETFs"). Our firm's value proposition comes from our intrinsic ability to manage risk more intuitively by utilizing equity and index options to help protect and diversify our client's investment portfolios in all types of market conditions.

WEALTHVISOR SIGNATURE

The *WealthVisor Signature* investment advisory service ensures our clients receive the utmost care and protection when it comes to their portfolio. We predominately allocate a variety of ETFs, bonds, mutual funds, and individual equities within the capacity of this service. We thoroughly assess a client's risk tolerance, financial situation, and long-term goals to build a tailored "My Investor Plan" for each advisory client. In addition, we implement:

- » Continuous discretionary investment management and the execution of all trades
- » Regular account monitoring and portfolio rebalancing as needed
- » Financial tools, resources, and education accessible inside the *MyWealthVisors* online portal
- » Complimentary access to our *WealthVisors Pro* financial planning subscription service
- » Personalizing investment portfolios based on individual preferences and circumstances
- » Access to licensed financial advisors for continuous advisory guidance
- » Implementation and annual updates to the client's comprehensive *My Investor Plan*

OPTIONVISOR SPECIALIZED

The *OptionVisor Specialized* investment advisory service is available for the more sophisticated investor looking to achieve increased levels of investment advisory in their portfolio using derivative strategies. This elite portfolio management service includes all the same core benefits listed in our *WealthVisor Signature* service but adds equity and index options in a client's portfolio.

The main options trading and investment strategies interlaced in this specialized service include:

- » Selling covered calls
- » "Legging into" and "rolling out" covered calls
- » Selling cash-secured puts
- » Purchasing long-term calls or puts (LEAPS)
- » Defined-risk debit trades such as vertical spreads, time spreads, straddles and strangles
- » Scaling into and out of positions as part of a prudent money management plan
- » Advanced rolling, legging, and hedging techniques on long or short equity or index positions

The primary focus of the *OptionVisor Specialized* investment advisory service is to increase the client's odds for success through high-probability options trading strategies, option Greeks analysis, and building positions with positive Theta decay (making money from the passage of time by selling option premium).

Although a majority of the derivative strategies we implement involve selling option premium, there are other defined-risk option debit strategies (as listed above) that we utilize within the scope of this advisory service. The goal of *OptionVisor* is to help our clients maximize gains by selling short-term option premium while minimizing capital exposure using options to hedge positions and diversify risk. The trading methods we deploy within the scope of this service will vary depending on each client's risk profile and underlying objectives.

Separately Managed Accounts

WealthVisors may also serve as the investment advisor for individual separately managed accounts (SMAs). A client might have multiple investment accounts, and may choose to have WealthVisors manage one or all of these accounts. Offering SMAs allows us to manage a segmented investment portfolio inside a client's total wealth management landscape. Separately managed accounts can best serve the client by using a multitude of trading strategies in all or a portion of a client's portfolio that derive from our *WealthVisor Signature* and *OptionVisor Specialized* investment advisory services. The goal of SMA management is to implement the client's *My Investor Plan* to our fullest potential. All separately managed accounts are held in custody with independent third party qualified custodians.

Financial Planning and Consulting Services

If financial planning and consulting services are needed, the client will compensate WealthVisors per a transactional fee schedule as outlined in the "Fees and Compensation" section of this brochure. Services may include but are not limited to analysis of investment portfolio, retirement planning, estate and succession planning, insurance preparation, personal financial planning, investment allocation strategies, and cash flow analysis. If a conflict of interest emerges between the interests of the investment advisor and the interests of the client, the client is under no commitment to act upon the investment advisor's advice. If the client elects to implement any of the recommendations, the client is under no obligation to conduct the business activity through WealthVisors.

Financial Advisory Consulting - Hourly Service:

For self-directed traders and investors, or clients of WealthVisors looking for one-on-one consulting with one of our professional advisors, we offer our tailored services on an hourly basis to discuss any of the following:

- » Detailed Market Commentary
- » Individual Security Analysis
- » Trade Strategy Review
- » Option Chain Analysis
- » Position Refinement
- » Portfolio Rebalancing
- » Watchlist Development
- » Asset Allocation Assessments

Our financial advisory consulting service is carried out by our qualified licensed investment advisors that are capable in resolving any other questions or concerns you may have in the world of trading or investing.

My Investor Plan - Comprehensive Financial Planning Service:

We know each of our clients is unique. We all have different goals and objectives to consider on our financial journey, but all of our clients should have one thing in common – a destination. That is why we have developed My Investor Plan™ – a comprehensive financial planning solution that includes:

- » A thorough review of your current financial situation
- » A discussion and understanding of your long-term financial goals and objectives
- » Determining your risk tolerance, time horizons and existing investments
- » The development of a detailed plan including all financial products and strategies required to take you from where you are today to where you need to be in the future

One of the benefits of our *My Investor Plan* service is that you get a 100% personally tailored comprehensive financial plan that will encompass all the necessary and relevant aspects of your economic well being. Our plan will involve the use of financial strategies in several areas specific to your life situation and goals such as:

- » Retirement planning
- » Cash flow analysis
- » College planning
- » Tax management
- » Estate needs
- » Income goals
- » Risk management
- » Debt structure
- » Insurance planning

One of our Licensed Financial Advisors will spend about a week working with you to gather information before investigating all options suitable to you before putting everything together in an elegant package that you can take with you forever.

WealthVisors Pro - Professional Financial Consulting Program:

WealthVisors also offers an ongoing professional financial consulting program called *WealthVisors Pro* (WVP) that is delivered through our secure <https://Pro.WealthVisors.com> online portal. This program is available for a flat annual fee detailed under the 'Fees and Compensation' section of this brochure. Clients of WealthVisors' WVP have access to the following:

- » Development of a simplified version of *My Investor Plan* including a cash flow analysis and basic budget
- » Guidance with current debt and setting up an actionable plan to pay off loans
- » Assistance with investment asset selections and allocation of employer retirement plan account(s)
- » Unlimited access to educational videos and material relating to self-directed trading and investing
- » Insurance analysis with access to qualified third-party vendors
- » Recommended personal investment strategies based on your individual *My Investor Score*
- » Investment calculators and assessment guides to help determine suitable investments

- » Annual review meeting to discuss changes and updates to your financial situation
- » Reduced fee by the annual subscription cost if a full comprehensive *My Investor Plan* needs to be developed

The *WealthVisors Pro* financial planning and consulting program will continue each year unless canceled in writing by either party.

MyWealthVisors Portal

For no additional fees to the investor, WealthVisors offers investment resources through our secure <https://My.WealthVisors.com> online portal (“*MyWealthVisors*”). Every “User” must go through our web-based “Investor Suitability Questionnaire” to determine prudent investor risk tolerance requirements before ever having the ability to receive investment help from us. After a user goes through the Investor Questionnaire, our algorithms segment each user with our proprietary *My Investor Score*[™] technology that associates a quantitative numerical value between 1 and 100. This process helps us determine where a user fits into our risk management parameters and then automatically segments the individual into the most appropriate sample investment portfolio. WealthVisors designates the relevant “model” portfolio(s) to users from our collection of tailored “*simplefolios*[™]” that are segmented by risk tolerance.

In addition to offering pre-designed model portfolios, we showcase relevant financial education that applies to a user’s specific risk profile, provide a sample wealth analysis to help users gauge where they stand in reaching their retirement goals, and showcase an example investment plan. Users can schedule a consultation call with one of our licensed financial advisors to learn more about our services and the steps in becoming an advisory client, if desired. The *MyWealthVisors* portal includes, but is not limited to, the following:

- » Sample Individual Investor Analysis that is referred to as *My Investor Plan*[™]
- » Relevant financial articles and videos in the field of personal finance, investing, retirement planning, options trading, and current market commentaries
- » Segmentation into one or more of our *simplefolios*[™] based off a user’s *My Investor Score*[™]
- » Showcase a sample cash flow analysis specified as *My Wealth Analysis*[™]
- » Individual investment examples that fall within the user’s *My Investor Score*[™] and segmented *simplefolio(s)*[™]

Users are not clients and do not pay investment advisory fees to WealthVisors as our firm does not manage a user’s assets or offer financial planning advice.

WV does not have any discretion over a user’s brokerage accounts. Users can purchase one-time investment plans, hourly financial advisory consulting services, and our ongoing financial planning program by signing a Financial Consulting Services Agreement and becoming a client of WealthVisors.

Seminars and Workshops

WealthVisors conducts seminars and workshops to educate the public on different types of investments and the various services available. The workshops are educational in nature, and there is no specific investment or tax advice provided. Since WV does not charge a fee to attend any of these instructional seminars, this service is not listed in “Item 5” below – where all the fees and compensation are listed regarding our service offerings.

Wrap Fee Program

WealthVisors does not participate in wrap fee programs.

Item 5 | Fees and Compensation

WealthVisors bases its fees on a percentage of assets under management for portfolio management services. For financial consulting and planning services, WealthVisors is compensated via hourly fees, one-time transactional costs and subscription-based fees.

Portfolio Management

WealthVisors enters into a written Investment Advisory Agreement with its clients utilizing portfolio management services. The final fee schedule is attached to each client's Investment Advisory Agreement.

WealthVisors charges a single annual fee based on the value of the client's total assets under management (AUM) with the firm. The single fee includes portfolio management, executing trades, and ongoing investment advisory services. The fee is calculated by the closing market value of the client's AUM on the last day of the preceding calendar month. For partial months, fees are prorated for only the days in the prior month of which WV managed the investment account (or accounts).

WealthVisors reserves the right to reduce its advisory fee at its discretion, including for promotional events that may result in complementary or reduced advisory charges for new clients, or to our current clients in exchange for referrals. The fee rate also has been decreased for personnel (including employees and consultants) of WEALTHVISORS LLC and its affiliates. These reductions may apply to members of the same households. All fee errors will be corrected immediately upon discovery, and any mistakes over \$10 will be communicated to the client in writing.

WEALTHVISOR SIGNATURE

The direct fee structure for our *WealthVisor Signature* investment advisory service is:

| \$100,000–\$499,999 | \$500,000–\$999,999 | \$1,00,000–\$1,999,999 | \$2,000,000–\$4,999,999 | \$5,000,000+ |
|---------------------|---------------------|------------------------|-------------------------|--------------|
| 1.25% | 1.00% | 0.90% | 0.80% | 0.70% |

How Fees are Paid: All fees for this service are automatically deducted from the client's brokerage account with the client's prior written authorization per the Investment Advisory Agreement.

When Fees are Due: *WealthVisor Signature* fees are due on the 10th day of each month for the prior month's investment services that were rendered.

Are Fees Negotiable: Fees for our *WealthVisor Signature* are non-negotiable but may be discounted at the firm's sole discretion under individual client needs and/or circumstances.

Refunds and Termination: Refunds are not applicable for our *WealthVisor Signature* investment advisory service. Either party can terminate the Investment Advisory Agreement without penalty by providing thirty days' written notice. The client may also cancel the Investment Advisory Agreement within five days of receiving our Firm Brochure: ADV Part 2A and/or entering into the written agreement.

OPTIONVISOR SPECIALIZED

The direct fee structure for our *OptionVisor Specialized* investment service is:

| \$250,000–\$499,999 | \$500,000–\$999,999 | \$1,000,000–\$1,999,999 | \$2,000,000–\$4,999,999 | \$5,000,000+ |
|---------------------|---------------------|-------------------------|-------------------------|--------------|
| 2.50% | 2.25% | 2.00% | 1.75% | 1.50% |

Clients of the *OptionVisor Specialized* advisory service that have under \$1,000,000 of AUM incur associated fees that are greater than the industry standard of 2%.

The higher fee schedule correlated with this specific service is due to the intricate nature of options trading and the increased level of time associated with executing derivative trades, monitoring and rolling open positions, conducting scans for suitable investment recommendations, performing detailed trade analysis, and analyzing option chain details on existing and future securities.

How Fees are Paid: All fees for the *OptionVisor Specialized* service are automatically deducted from the client's brokerage account with the client's prior written authorization per the Investment Advisory Agreement.

When Fees are Due: *OptionVisor Specialized* fees are due on the 10th day of each month for the prior month's investment services that were effected.

Are Fees Negotiable: Fees for our *OptionVisor Specialized* service are non-negotiable but may be discounted at the firm's sole discretion under individual client needs and/or circumstances.

Refunds and Termination: Refunds are not applicable for the *OptionVisor Specialized* advisory service. Either party can terminate the Investment Advisory Agreement without penalty by providing thirty days' written notice. The client may also cancel the Investment Advisory Agreement within five days of receiving our Firm Brochure: ADV Part 2A and/or entering into the written agreement.

Payment of Portfolio Management Fees

Advisory fees for our two portfolio management services are calculated on a monthly basis and deducted directly from the client's brokerage account with prior client written authorization per the Investment Advisory Agreement.

Fees are withdrawn on the 10th day of each month for the advisory services carried out in the preceding month. If sufficient funds are not available to pay such fees, securities in an amount equal to the balance of unpaid fees will be liquidated to pay for the balance due.

Clients that utilize portfolio management services provide written authority to have WealthVisors deduct the advisory fee directly from the client's investment account, and client's securities may be subject to liquidation to satisfy fees owed.

Financial Planning and Consulting Services

Financial Advisory Consulting - Hourly Service:

Clients utilizing our *Financial Advisory Consulting Hourly Service* enter into a Financial Consulting Services Agreement (“the Agreement”) with WEALTHVISORS LLC before services are rendered.

Direct Service Fee: Our financial advisory consulting service is a flat \$300 per hour cost.

How Fees are Paid: The fee can be paid via credit card, check, cash, wire transfer or as a direct deduction from the client’s brokerage account with the client’s prior written authorization.

When Fees are Due: Payable and due after services are rendered to the client as arrears.

Are Fees Negotiable: Fees are non-negotiable but may be discounted at the firm’s sole discretion.

Refunds and Termination: Refunds are not granted for hourly financial consulting services and either party can terminate the Agreement by providing notice in writing.

My Investor Plan - Comprehensive Financial Planning Service:

Clients utilizing our *Comprehensive Financial Planning Service* enter into a Financial Consulting Services Agreement (“the Agreement”) with WEALTHVISORS LLC before any services are effected.

Direct Service Fee: The cost to have a comprehensive *My Investor Plan* developed is a one-time fee of \$1500.

How Fees are Paid: The fee can be paid via credit card, check, cash, wire transfer or as a direct deduction from the client’s brokerage account with the client’s prior written authorization.

When Fees are Due: A fee of \$500 (the “deposit”) is payable upon commencement of starting the client’s *My Investor Plan*. The remaining \$1000 is due as arrears once services are completed and the full plan is delivered to the client.

Are Fees Negotiable: Fees for this service are non-negotiable, however the cost may be discounted at the firm’s sole discretion through various incentive programs that are offered.

Refunds and Termination: If the client is not satisfied with the outcome of this service, WealthVisors will grant a 50% partial refund on the entire purchase price of the *My Investor Plan*. A client may terminate the Agreement and receive a full refund of the \$500 deposit by proving the Investment Advisor with written notice within five days of receiving the WealthVisors - Form ADV Part 2A: Firm Brochure.

WealthVisors Pro - Professional Financial Consulting Program:

Clients that make use of our *Professional Financial Consulting Program* enter into a Financial Consulting Subscription Agreement with WEALTHVISORS LLC before any services are effected.

Direct Service Fee: The *WealthVisors Pro* financial planning and consulting subscription program originates with a setup fee, which varies from \$0 to \$300, and an annual recurring fee, which ranges from \$400 to \$800. WV may change the price of the setup fee or the annual recurring fee depending on the condition of our financial technology platform and/or based on different incentive programs that we offer.

How Fees are Paid: Fees for the *WealthVisors Pro* subscription can be paid using a credit or debit card or as a direct deduction from the client's brokerage account with the client's prior written consent.

When Fees are Due: The setup fee is payable and due immediately, together with the execution of the Subscription Agreement. Our annual recurring fee is due and payable on the first day of each annual period, as outlined in the Subscription Agreement.

Are Fees Negotiable: Fees for WVP are non-negotiable, however at WealthVisors' sole discretion, the setup fee, yearly recurring fee, or both, may be waived periodically or discounted based on various incentive programs and/or individual client needs or circumstances.

Refunds and Termination: Paid but unearned fees are refunded on a pro-rated basis. In the first year of service, 100% of the setup fee and 50% of the annual recurring fee shall be considered earned upon transmission of the simplified version of the *My Investor Plan* to the client. Clients can terminate their subscription by providing written notice to WealthVisors.

My WealthVisors Portal

The *My WealthVisors Portal* is our complimentary service that is furnished to individuals that go through and submit our detailed online Investor Questionnaire. In exchange for one's personal information, a secure "User" account is created where people are able to learn more about WealthVisors' services, determine one's *My Investor Score*, view a sample model portfolio that is relevant to a user's risk tolerance, receive free financial education, setup phone consultations, and have the ability to purchase any of the aforementioned financial planning or consulting services if deemed necessary by the user. There is no direct fee associated with this service and users can terminate their account inside the <https://My.WealthVisors.com> portal at anytime.

Other Fees and Expenses

All fees paid to WealthVisors, for portfolio management and financial planning or consulting services are separate and distinct from the costs and expenses charged by pooled investment vehicles, such as exchange-traded funds, mutual funds, closed-end investment companies or other managed investments to their investors. The specific fees and expenses are described in each fund's prospectus or governing documents. There may be additional costs assessed, that are not included in the advisory services fees, such as costs associated with exchanging currencies, wire transfer fees, or other fees required by law. These fees are out of WealthVisors' control and are the sole responsibility of the client.

Item 6 | **Performance Based Fees and Side by Side Management**

WealthVisors does not charge performance-based fees (e.g. fees calculated based on a share of capital gains or capital appreciation on managed assets by the Investment Advisor). Some investment advisors experience conflicts of interest in connection with the side-by-side management of accounts with different fee schedules, however these conflicts are not applicable to our firm. Client fees are solely based off the total assets under management with WealthVisors.

Item 7 | **Types of Clients**

WealthVisors primarily provides investment advisory services to:

- » Individuals
- » High-net worth individuals
- » Family offices
- » Profit sharing plans
- » Charitable organizations
- » Corporations and other business entities
- » Investment companies

WealthVisors has a minimum relationship size of \$100,000. The minimum values may be reduced or waived at WealthVisors LLC's discretion.

Item 8 | **Methods of Analysis, Investment Strategies and Risk of Loss**

Methods of Analysis

WealthVisors' methods of analysis consist of fundamental research on securities, technical analysis and cyclical examination. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not indicative of future results nor a guarantee of future returns.

Our firm's core expertise is the ability to assess fundamental appeal of industries and companies based upon their growth trajectory, profit potential, valuation characteristics and financial worthiness. When combining these components into a valuation method centralized around earnings and recurring cash flow, we make conclusions in the most desirable securities to invest in using a calculated risk/reward methodology. WVs' approach is derived from the analysis of a company's financial statements, and the screening of securities using valuation formulas and proprietary trade scans. WealthVisors seeks optimal returns for our clients while mitigating the risk of capital loss. Our goal is to identify value in a security by each of the following methods:

Fundamental Analysis: This relates to a security's "intrinsic" value. Intrinsic or "fundamental" value is attached to the present value of the cash flows to be distributed to the owners of a security discounted at a rate that adequately reflects the time value of money, the risks associated that the expected cash flows may not be realized, volatility of the cash flows, and the security's overall liquidity. In the case of equity securities, cash flows come in from operational activities or the sale of the company's assets. WealthVisors aims to measure the value of equity securities by analyzing the global economy, industry-specific trends, corporate management circumstances, and the financial worthiness of a particular company to determine if such securities are under priced and an ideal time to buy, or overpriced indicating it may be time to sell. Fundamental analysis does not attempt to anticipate market movements; this presents a possible risk, as the price of a security can move in tandem with the overall market dynamics regardless of the economic factors considered in analyzing an underlying security. Our fundamental analysis evaluates securities based on historical and projected financial performance using a multitude of valuation ratios and metrics that include, but are not limited to: price/earnings ratio, cash flow per share, earnings per share, quarterly and annual earnings growth rates, free cash flow per share, market capitalization, volume, open interest, put-call ratio, book value, current ratio, sales per share, return on assets, return on equity, debt to equity ratio, profit margin and dividend yield.

Technical Analysis: This method of analysis uses market data and price patterns to predict future price movements and to uncover trends in securities. WealthVisors utilizes technical analysis through various indicators; custom study sets to identify trends, support and resistance levels, oversold or overbought conditions and momentum activity from a price action standpoint. Technical analysis gauges investments based on supply and demand with a focus on charts and price movement to determine the strength or weakness of a security. WealthVisors determines to buy and sell securities based on technical analysis research using market statistics and back-tested mechanical systems. The technical analysis methods and tools actively used in our advisory services include, but are not limited to: moving averages, price patterns, support and resistance, candlestick formations, relative strength index, directional movement indicator, bollinger bands, commodity channel index, money flow indicators, linear regression channels, parabolic price/time systems, stochastics oscillator, advance/decline indicators, historical and implied volatility change, on balance volume, moving average convergence divergence, and average true range.

Investor Psychology: This method of analysis is attributed to the inclination of investors making investment decisions based on the greed and fear market principle. Investors that have profits in an investment tend to believe continued gains are possible by increasing their capital exposure. On the other side are investors

who are down money on an investment; often prone to fear of additional losses, thus reducing their capital exposure. In today's global market, security prices support exceptional swings in price due to psychological factors embedded in investor psychology.

Investment Liquidity: The liquidity in an investment refers to the amount of capital committed and the volume of trading activity surrounding the underlying investment. Assuming the fundamental value of a security remains constant, supply and demand regulate an increase of security prices when additional capital enters an investment and a decrease in security prices when capital is withdrawn. For instance, in today's equity markets, when investors expand liquidity by purchasing mutual funds or exchange-traded funds, the managers of these funds are compelled to buy securities regardless of the price valuation associated with the security.

WealthVisors believes fundamental analysis predominantly determines the long-term value of an investment. Regardless of this conclusion, technical, psychological and investment liquidity factors inherently affect trading values in the short term. With the market creating temporary valuation disconnections, opportunities become available for the observant, attentive and patient investor focused on extrapolating intrinsic value.

Investment Strategies

Typically, the investment strategies we use are growth and income-oriented investment strategies designed for investors seeking to diversify their portfolios through a long-term tactical asset allocation model. Our strategies include an equity-based approach, which on a perpetual basis, examines a large selection of individual equities, mutual funds, international funds, and ETFs, that together broadly represent the global economy. Using technical analysis amongst other methods of analysis, WV determines which equity securities, mutual funds, industry sector funds, or international funds, if any, look attractive to own. The determination to enter into a trade ultimately comes down to the fundamentals of each security analyzed, the underlying trend of each security, and the overall health of the U.S. economy. Depending on the client's investment objectives and suitability examination, our firm's investment strategies include the following:

- » Long-term purchases
- » Short-term purchases
- » Swing Trading
- » Short selling
- » Option purchases (including long-term options (LEAPS), short-term calls or puts, and debit spreads)
- » Option writing (including covered calls, cash-secured puts, and credit spreads)
- » Exchange traded funds, and mutual funds

Primarily, the strategies we use seek capital appreciation through precise asset selection. WealthVisors will invest in the securities and funds with the highest rating, as determined by our analysis. When the stock market is in a strong intermediate or long-term trend, our strategies are feasible to be strongly correlated to either the U.S. or international equity markets, as well as either the U.S. or global fixed income markets. WealthVisors conducts a monthly hazard assessment of the equity markets to manage our client's portfolio risk judiciously. This assessment attempts to identify periods of high risk by studying economic data of the U.S. economy. Based on the results of the evaluation, WealthVisors may alter the strategies to broader-based investments and further seek to limit risk by adjusting allocations to cash on a regular basis. Depending on the severity of the risk signals, the firm seeks out opportunities for growth through funds that could benefit from poor equity market conditions, such as bonds, commodities, or alternative investment funds.

Risk of Loss Associated with Investment Advisor's Investment Strategy and Methods

Clients can employ WealthVisors to manage all or a portion of their assets on a discretionary basis. Our firm primarily allocates client assets among different active and passive investment strategies. The following is a summary of the distinct material risks associated with WealthVisors' primary investment strategies and the types of securities our firm implements. This list does not imply to be a complete detail or description of the risks involved with an investment. These risk factors include only the risks that WV believes to be material, significant or unique in relation to WealthVisors' primary investment strategies. While there is overlap among the portfolios of clients, some of the risk factors outlined below may apply to specific clients and not for others.

Dependence on Tyler Chianelli

As the portfolio manager, Tyler Chianelli has ultimate authority for all investment and trading decisions on behalf of our clients. There can be no guarantee that his services will be available for any length of time. Furthermore, his death or incapacitation could have a material and adverse impact on the clients' investment performance, resulting in substantial withdrawals of managed assets by WealthVisors.

Business Risk: These are risks associated with a particular sector or a specific company inside a sub-industry. For example, gold-mining companies depend on finding gold and then mining it, a lengthy process, before they can generate a profit. Gold miners carry a higher risk of profitability than a public utility company, which produces income from a steady stream of customers who purchase electricity regardless of the underlying economic conditions.

Currency Risk: Investments made abroad are subject to fluctuations in the value of the U.S. dollar against the currency of the investment's originating country. Currency risk is also perceived as exchange rate risk and should be factored in when making investments internationally.

Data & Model Risk: WealthVisors' investment research and financial modeling processes are comprehensive and sometimes implemented through algorithms and programming code when selecting individual securities to trade. Due to the complexity of the individual tasks and dependence on third party vendors for data, there is a possibility that financial models and formulas may contain an error. Even though the firm's employees have substantial expertise in their fields and there are methods for the proper levels of oversight, these errors could adversely affect a client's portfolio and likely would not constitute a trade error under WealthVisors' compliance and supervisory policies.

Emerging Markets: Our firm invests in assets and securities issued by emerging markets companies. Securities of many issuers in emerging markets may be less liquid and more volatile than securities of domestic issuers, thus the risks of investing in foreign securities are often higher. Risks associated with emerging markets include the possibility of confiscation, nationalization, encumbrance of foreign taxes on income and gains from securities, demand for a dividend or interest withholding, deceitful foreign exchange regulators, separate currency blockages or transfer restraints, military plots or other unfavorable governmental or economic developments, default in foreign equity securities, insufficient government surveillance and regulation of securities exchanges, brokers and registered companies, and the challenge of enforcing commitments in other nations. Investments made in emerging markets involve careful consideration due to insufficient information, higher brokerage fees and custodial costs, different accounting standards and less liquid markets. Communication between the United States and emerging market issuers may have limited reliability than when dealing with U.S. security issuers, raising the risk of late settlements of securities transactions or lack of stock certificate issuance for equity securities.

Equity Risk: A meaningful portion of our investment strategies involves equity securities. Equity securities are subject to the risk that stock prices may rise or fall over short or prolonged periods of time; often moving in cycles where the underlying equity value may fluctuate drastically each day. Additionally, individual companies may report poor earnings results or be negatively impacted by economic or industrial trends and developments. These circumstances add to price volatility, which is the predominant risk of investing in equities.

Financial Risk: Additional borrowing to finance the operations of a business expands the risk of profitability because the company must meet the terms of its commitments in both good and bad times. During periods of financial hardship, the inability to meet loan obligations may result in bankruptcy or declining market value.

Increased Costs of Frequent Trading: Various investment strategies deployed by WealthVisors may involve frequent trading. Brokerage commissions and portfolio turnover may consequently increase the associated trading costs a client experiences when compared to investment vehicles of a similar capacity.

Investments in Non-Marketable Securities: Investment funds dealing with private equity, venture capital, and real estate may invest money in non-marketable securities as disclosed in their associated governing documents. As a result, the portfolio manager may have to carry various investments during unfavorable price movements, creating non-marketable securities.

Inflation Risk: When any type of inflation is present, a dollar today buys more than a dollar next year, because purchasing power is deteriorating at the rate of inflation.

Interest Rate Risk: Changes in interest rates cause investment prices to fluctuate. For instance, when interest rates increase, yields on existing bonds become less attractive, prompting their market values to depreciate.

Investing in Options: WealthVisors may govern the purchase or sale of covered and uncovered call or put options in a client's portfolio. The buyer of a call or put option runs the risk of losing the entire investment in a relatively short amount of time. When purchasing options (both calls and puts) the value of the underlying contract loses value from the passage of time. This option pricing characteristic is known as Theta decay. The seller (writer) of an uncovered call option is subject to losses should the price of the underlying security increase above the sold strike price of the short call option. The writer of an uncovered (naked) put option is subject to losses when the price of the underlying security decreases below the sold strike price of the short put option. There are distinct risks associated with uncovered option writing, which expose the investor to potentially catastrophic losses. Therefore, this type of strategy may not be suitable for all clients approved for options trading. The possible loss of naked call writing is unlimited. Selling naked puts is a defined risk options strategy since a security cannot go below zero. The potential risk when selling covered calls that investors should be aware of is through opportunity cost of missed upside profit potential. For instance, if an investor owned 100 shares of stock and decided to sell a call option against his or her shares, this would be considered "covered", known as covered call writing. If the underlying stock rose 10% above the sold strike price of the covered call, the investor would miss out on the 10% upside minus the credit received to sell the call option. Options also face volatility risk (Vega), rate of change risk (Gamma) and interest rate risk (Rho); varying between strategies.

Leverage: Clients often borrow money from investment banks, brokerage firms and other financial institutions at current interest rates. This method of investing is referred to as margin privileges and gives investors access to additional capital to invest in securities. Gains that are realized with supplemental funds often increase the value of the portfolio at a faster rate than without the borrowing capability. Conversely, if investment returns fail to satisfy the cost of borrowing, the value of the leveraged portfolio could decrease more rapidly if there was no margin risk involved. In conjunction with margin borrowing restrictions imposed by the Federal Reserve Board, financing may be reduced immediately when the value of the leveraged account falls below the coverage requirement of the margin limitations. In the event of such necessary reductions of borrowing, the

securities held in the portfolio could be liquidated at times when it might not be desirable or advantageous to do so for the client. Capital losses in margin securities may exceed the amount initially invested.

Liquidity: WealthVisors does not foresee a conflict of interest between clients and employees of WealthVisors in regards to having investments in the same securities due to the depth of liquidity in the markets and securities we trade, however clients should be aware that this potential conflict of interest does exist.

Long-term Purchases: We generally purchase securities with the intention of holding them for at least a year or more in a client's portfolio. This long-term purchase strategy is put into action when we believe an investment is undervalued. The risk with this strategy is when holding securities for this amount of time, we may not take advantage of short-term gains that could be profitable for the client. Furthermore, if our predictions are not accurate, the value of the investment may fall much lower before we sell the security.

Loss of Capital: The market value of a security may increase or decrease over time, and all investments made in securities involve the risk of capital losses. Large fluctuations can cause investments to be worth less than the price initially paid or much less than it was worth at a previous point in time. Although WealthVisors believes that its investment approach will reduce this risk to some extent through diversification of asset classes, individual securities, and investment strategies, WealthVisors does not represent or guarantee that our investment management services will be successful. To the degree in which portfolio managers proceed with investment opportunities in undervalued securities and "special situations," there is inherent risk in the accurate assessment of future values and always poses the risk of capital loss.

Market Risk: Securities all share price fluctuations and investors can lose money by investing in any security issued. The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions can trigger market events.

Portfolio Margin: Client accounts may be further leveraged using a type of borrowing capacity designated as "portfolio margin." Portfolio margin sets margin requirements based upon a measurement of the net risk of all positions in the account, giving influence to all possible balancing circumstances. Portfolio margin uses financial models to set margin requirements based on the most severe potential net loss on all of the positions in the account, regarding various simulated market actions and considering neutralizing positions in the portfolio. Allowing a broker-dealer to set margin requirements based on a value and risk calculation usually results in higher leverage for the client. Depending on the specific positions secured, the contraction in the mandatory margin could top 90%. With such accounts, broker-dealers increase credit to qualified clients without being restricted to constraints on such margin activities required by Regulation T and current exchange margin rules. Enhanced leverage involves a higher potential for faster gain, but also increases the risk of capital loss.

Reinvestment Risk: Reinvestment risk fundamentally relates to fixed income securities and is the risk that anticipated profits from investments may be reinvested at conceivably lower rates of return, via interest rates.

Rebalancing: WealthVisors manages client accounts on a regular basis using a robust technology platform to confirm portfolios are harmonious with a balanced asset structure. Portfolios can be rebalanced due to price movements in securities, changes in a client's investor score, capital inflows or outflows or updates in the design of the model portfolios established by WealthVisors' investment managers. If security allocations deviate from target weights by more than a predetermined amount, portfolios will be rebalanced to achieve the proper concentration, typically within 1 business day. Dividend income is often re-invested in securities that are most underweight relative to the portfolio goal, which serves as a form of protective rebalancing.

Short Selling Risk: Periodically the assets contained in client portfolios may be used in short sale transactions. Selling a security short produces gains when the prices of the underlying asset sold short declines; hence securities that are sold short may increase in value during a bear (declining) market. However, in a bull (rising) market, short selling may be more prone to losses because the market conditions may be more favorable for the securities sold short to increase in value. Hypothetically, there is unlimited risk of loss associated with short selling because the underlying instrument sold short could go to infinity.

Stop-Loss Orders: WealthVisors often uses conditional trading orders, such as “stop-loss,” “stop-limit” or “trailing stop” orders to help prevent losses. Utilizing this technique does not undeniably limit the losses to the designated amounts. Market conditions can become exceptionally volatile which could make it improbable to execute these types of orders. All security transactions involve uncertainty, and strategies using a combination of instruments, such as “option spreads” may be more risky than taking simple long or short stock positions.

Technology Risk: WealthVisors produces some of its security recommendations using proprietary software that appropriates numerous quantitative and qualitative investment formulas. Technology-generated advice, like all investment recommendations, may be subjected to a system error. WealthVisors makes no guarantees or representation that investment recommendations provided by our proprietary computer models will be successful. Moreover, the administration of the software might be prone to human errors, processing malfunctions, communication lapses or system failure. Updates performed to our algorithms may not always have the sought after or planned effect. As market participants and conditions develop over time, a once thriving model may become antiquated or incorrect, conceivably without the technology system recognizing the development before new recommendations are provided. Advisory clients and users are advised to confirm any investment recommendations produced by the WealthVisors’ platform with their respective legal, tax and financial advisors and always conduct their own due diligence on investment recommendations.

Trading: When appropriating short-term trading strategies, we enter into positions with the intention of closing out the trade within a comparatively short time (usually a year or less). We do this to take advantage of short-term price fluctuations; a trading strategy commonly referred to as swing trading. Swing trading poses risks that the forecasted price move does not manifest; leaving us with the alternative of having a long-term investment in a security that was designed to be a short-term trade, or possibly taking a loss. Short-term strategies involve more frequent trading compared to longer-term strategies, resulting in increased commissions, custodial-related fees and less favorable tax treatment of short-term capital gains.

Volatility and Correlation Risk: The investment management process instilled by WealthVisors is derived in part by the volatility of returns and the historical performance to help predict future returns along with the associated risks. Adverse changes in volatility can impact the financial markets. Implied volatility surges in the markets have often been related with sudden adjustments to macroeconomic, geopolitical or other distinctive public events. It is not feasible for WealthVisors to prognosticate the timing of these matters. Increased levels of volatility in the financial markets could displace WealthVisors’ investment strategy. Any historical returns, expected returns, risk forecasts or probability forecasts might not exhibit actual future performance or the risk that is materialized by the client.

Overall Investment Risk: There is no guarantee that WealthVisors’ investment strategies, methods of analysis or any specific investment advisory service provided by our firm will be deemed profitable, or insulate clients from losses due to market corrections or declines. The degree of analytical tact along with the necessary computer hardware and software systems for successful trading and investing is extraordinarily high. There is no promise that WealthVisors will accurately assess the characteristics and breadth of the numerous factors that could influence trading or investment success. All investments involve risk. WealthVisors does

not guarantee the results of our advice given. Significant losses can occur by investing in any security, or by following any strategy, including those recommended or applied by our firm.

Item 9 | **Disciplinary Information**

WealthVisors has no pending or prior legal or disciplinary events that are material to a client's evaluation of WealthVisors' advisory business or management capability.

Item 10 | **Other Financial Industry Activities**

Broker-Dealer or Representative Registration

WealthVisors does not have any affiliation to a custodian or broker-dealer, nor does it, or its employees have any affiliation to a broker-dealer. WealthVisors LLC is not registered as a broker-dealer.

Futures or Commodity Registration

Neither WealthVisors nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member, Tyler Chianelli is the principal owner of a separate financial related business called The Investor Institute, LLC (“The Investor Institute”). This affiliated company provides educational content and commercial technology to help bring financial awareness and clarity to self-directed traders and investors – with the goal of simplifying the process on how to invest in the Stock Market while being equipped to have more productive discussions with ones’ financial advisor.

Both prospects and clients of WealthVisors are provided with generalized educational materials through video and digital publications that relate to trading and investing in securities along with the strategies, methods of analysis and risks involved with such activities.

No conflict of interest arises with this material relationship as active advisory clients and ongoing *My WealthVisor Pro* subscription clients receive access to all the educational materials and financial tools that are owned and distributed by The Investor Institute for no additional fee. There is an exclusive licensing agreement that grants all intellectual property owned by The Investor Institute to be made available to WealthVisors LLC for no direct cost to the client.

WealthVisors does not solicit nor recommend clients to purchase any products from The Investor Institute as this would create a conflict of interest. However, if an unforeseen conflict of interest were to arise because of this material relationship, it would be mitigated by disclosures, procedures, and WVs’ fiduciary obligation to place the interests of the client first.

Our firm and management personnel does not have any other relationships with financial industry businesses such as an investment company or pooled investment vehicle, other investment advisor or financial planner, 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 limited partnerships.

Recommendations or Selections of Other Investment Advisors

WealthVisors does not utilize the services of third party money managers.

Item 11 | **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

WealthVisors has developed a Code of Ethics doctrine (“Code”). Our Code instills rules of conduct for all employees of WV and is designed to educate any staff member of WealthVisors about the firm’s ethical business practices and to set forth standards of conduct within our firm. We have strict policies instilled that forbid employees from acting in deceptive, manipulative or fraudulent behavior. The Code reflects WV and its supervised persons’ responsibility to act in the best interest of their client(s) at all times.

Employees are prohibited from trading for themselves or others while in possession of material non-public information as well as communicating non-public information to anyone else. Our Code includes a forbiddance against the use of material non-public information. We do not allow any employees of WealthVisors to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

The WealthVisors Code of Ethics also covers restrictions on personal securities transactions of employees and officers. We uphold strict internal limitations and pre-clearance requirements for all staff members of WealthVisors who wish to invest in the same securities purchased on behalf of our clients. WealthVisors reserves the right to disapprove any proposed transaction that may have the appearance of imprudent behavior or that violates our Code of Ethics policy.

When employees buy or sell securities for their own accounts, our Code addresses how to mitigate any conflict of interest with our clients by not recommending securities or other investment products to advisory clients in which our firm or any related person has a financial or ownership interest. If WealthVisors or any related person buys or sells securities for themselves that is also recommended to advisory clients, our Code assures that clients’ interests are always taken care of before our own.

WV and its employees can buy or sell securities that are also held by clients however employees are strictly prohibited from trading their securities ahead of client trades. In order to mitigate conflicts of interest such as trading in front of client transactions, employees are required to disclose all reportable securities activities as well as provide WealthVisors with copies of their brokerage statements.

WealthVisors does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended, therefore no conflicts of interest exist. However, employees can buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide WV with copies of their brokerage statements.

The Chief Compliance Officer of WealthVisors is Tyler Chianelli. He evaluates all employee trades each quarter. The personal trading investigations ensure that the private trading of employees does not influence the markets and that clients of the firm receive preferred treatment over employee transactions.

Our Code of Ethics is comprised upon the moral standard that WealthVisors and its representatives have a fiduciary duty to our advisory clients in transacting their affairs, including personal securities trading, in such a manner as to avoid serving their interests ahead of clients. Individuals that are employed by WealthVisors shall never take advantage of their position with the firm and abuse their trust and responsibility as a representative of WealthVisors.

The full doctrine of our Code of Ethics is available to any client or prospective client upon written request.

Item 12 | **Brokerage Practices**

WealthVisors is an independent investment advisor and is not affiliated with any broker-dealers, banks or custodians. WealthVisors will recommend brokerage companies with whom clients may want to establish an account, but the choice is solely up to the client. Neither WealthVisors nor any of its supervised persons within the firm receive compensation for the sale of securities.

The investment advisor will place orders for a client's account through the selected custodian, and the client is responsible for paying all the fees or charges associated with the execution of such orders. WealthVisors does not receive any portion of the trading fees or expenses incurred by the client. Brokerage and custodial relationships are reviewed periodically to evaluate the transaction costs, custodial fees and other costs charged to the client.

Clients are required to establish brokerage accounts at a qualified custodian ("Broker" or "Brokers") identified by WealthVisors LLC. All identified Brokers are member firms of FINRA and SIPC. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. At this time, we recommend our clients use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade").

TD Ameritrade Institutional
PO BOX 650567
Dallas, TX 75265-0567
www.tdainstitutional.com

In determining whether to establish an account, a client should be aware that the overall cost to the client in utilizing advisory services by WV may be higher or lower than what the client might incur by purchasing the same securities themselves. In order to compare the cost of WealthVisors' investment advisory services with unbundled services, the client should consider the turnover rate for the different investment strategies implemented, trading activity in the account, related investment research, standard advisory fees, time to execute trades and what other investment advisors charge for portfolio management services.

Aggregating Securities Transaction for Client Accounts

WealthVisors is authorized in its discretion to aggregate purchases, sales, and other transactions made for the account with transactions, sales, and purchases in the same securities for other clients of WV. All clients participating in the collective order receive an average execution price with all other transaction costs administered on a pro-rated basis. Our firm aggregates orders when specific trade parameters fit a wide range of investor profiles regarding our clients with the goal to help reduce costs and deliver the most favorable price.

Best Execution

Investment advisors that control or manage client portfolios on a discretionary basis have a fiduciary obligation of best execution. WealthVisors' examines the execution characteristics of securities trades at each custodian on a perpetual quarterly basis.

Directed Brokerage

In situations where a client directs WealthVisors to use a distinct broker-dealer, WV still has a fiduciary responsibility to its clients to perform such duties. The following applies with Directed Brokerage: WealthVisors' incapacity to negotiate commissions and receive volume discounts can cause a disparity in commission charges amongst clients, as well as conflicts of interest originating from brokerage firm referrals.

Soft Dollar Arrangements

WealthVisors has an incentive to recommend TD Ameritrade Institutional to our clients based on the robust suite of technology they offer our firm in managing our client portfolios more effectively. There is no direct link between WealthVisors' use of TD Ameritrade and the investment advice provided to our clients. WealthVisors receives economic benefits in the form of research and other "soft dollar benefits" through its participation in the program that is typically not available to TD Ameritrade retail customers.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving WV associates; access to block trading (which gives the capability to aggregate securities transactions for execution and then designate the suitable shares to client accounts); the ability to have advisory fees deducted straight from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and reductions on compliance, marketing, research, technology, and application management products or services provided to WV by third party vendors. TD Ameritrade may also have paid for business consulting and professional services obtained by associated persons of WealthVisors.

Some of the products and services made accessible by TD Ameritrade through the program may benefit WV but not its client accounts. Other benefits made possible by TD Ameritrade are intended to help WV manage and further develop its business operations. The benefits received by WV or its employees through cooperation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to clients, WV strives at all times to put the interests of its clients first. Clients should be aware that the receipt of economic benefits by WV or its related persons creates a potential conflict of interest and may indirectly impact WealthVisors' choice of TD Ameritrade for custody and brokerage services..

Item 13 | **Review of Accounts**

Investment advisory accounts are reviewed on at least a quarterly basis by Tyler Chianelli, Chief Compliance Officer. More frequent reviews of accounts may also be triggered by market, economic or political events, or by changes in the client's financial situation. These financial situations include, but are not limited to retirement, employment changes, tax laws, unforeseen expenses, medical issues, inheritance, educational expenses or a physical change in address. Clients utilizing financial planning or consulting services will have account reviews performed at least annually by Tyler Chianelli.

All clients are encouraged to discuss their financial needs, investment objectives and overall financial goals with the firm and to keep WealthVisors informed of any changes that may occur.

Clients are provided with trade confirmations and account statements directly from the broker-dealer or custodian for the client's account on at least a quarterly basis for separately managed accounts. Clients also receive a written report from WealthVisors that may include relevant portfolio or market-related information such as an inventory of account holdings and the portfolio performance on a quarterly basis that includes the advisory fees deducted from the clients' account. Clients should compare the account statements they receive from their custodian with those received by WealthVisors.

Review of Client Accounts on a Non-Periodic Basis

WealthVisors monitors *OptionVisor Specialized* client accounts as part of an open-ended process with regular portfolio reviews conducted on at least a monthly basis. Due to the nature of derivatives and the ongoing associated cycle of options expiration, positions are monitored more actively to ensure trades are in accordance with prudent investment management. *OptionVisor Specialized* account reviews are conducted by Tyler Chianelli, CCO who is experienced with options trading and portfolio management.

All portfolios are overseen and managed per the Investment Advisory Agreement and individual My Investor Plan developed upon commencement of the relationship with WealthVisors LLC.

Client Contact

Clients should recognize that the Investment Advisor primarily uses electronic communications instead of conventional telephone channels when providing a majority of our client support. If a client needs support, he or she may contact WV via email or through our secure online system. However, all of our *Platinum Wealth Club* clients have direct phone access to his or her advisor. Clients should be aware that portfolio managers may not be able to talk during market events, such as periods of extraordinary volatility or market crashes. Potential clients should understand our primary communication avenue is through electronic communications.

In addition to the accessibility of the *MyWealthVisors* online portal, WealthVisors provides a collection of publications constructed by professional money managers encompassing different client risk tolerances, portfolio structures and investment selections. All of this information is available on our website, including a frequently asked questions section and the WealthVisors "Resource Center," available at: <https://www.wealthvisors.com/resources>. Our Resource Center is designed to address frequently asked questions that clients have regarding the management of his or her account. Client support personnel may provide links to such material when dealing with customer service. Clients receiving additional financial or investment services may schedule telephone consultations with a financial professional through our online scheduling system.

Item 14 | **Client Referrals and Other Compensation**

Our firm does not receive any economic benefits from external sources.

WealthVisors may, in the future, receive compensation by directing clients to third-party financial advisors, insurance agents or certified financial planners (CFPs). Before selecting other third-party professionals for our clients, WV will ensure these other advisors, insurance agents or CFPs are appropriately licensed and registered with the respective state and federal authorities. If a potential conflict of interest does exist it will be disclosed to the client before any referral is initiated. WealthVisors shall disclose the referral compensation received and will always act in the best interest of the client.

Item 15 | **Custody**

WealthVisors does not maintain hard custody of client assets. All client accounts are held with unaffiliated qualified broker-dealers or banks. Account custodians send statements directly to the account owner generally on a monthly basis or as requested by the client. WealthVisors encourages clients to carefully review and compare the information in the statements provided by the custodian with the information provided in the quarterly statements distributed by WealthVisors LLC.

Since WealthVisors automatically deducts its advisory fee from client accounts per the Investment Advisory Agreement, our firm maintains “soft” custody on client assets under management.

Item 16 | **Investment Discretion**

WealthVisors receives discretionary authority to manage the assets of our clients per the governing documents of each client. The client grants discretionary authority to WV per the Investment Advisory Agreement and/or executing a limited power of attorney document. WealthVisors allows clients to place certain limitations on the asset classes or securities that can or cannot be traded upon commencement of the Investment Advisory Agreement.

WV has the authorization to decide, without obtaining specific client consent, the securities to be bought or sold, the type, the amount of the securities to be bought or sold, price per share and/or contract price, when transactions are initiated, and the broker-dealer or custodian to be used.

The client permits the selected custodian to be used and the commission rates paid to the custodian. WealthVisors will attempt to negotiate the commission rates in the best interest of the client, however the client should understand WV has limited control over the commission rates that are charged by the custodian. WealthVisors does not collect any part of the transaction fees or commissions paid by the client to the custodian on individual trades.

Item 17 | **Voting Client Securities**

WealthVisors will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the underlying issuer or via the client's custodian. Clients should direct all proxy questions to the issuer of the security. WealthVisors does not vote proxies on behalf of clients.

Item 18 | **Financial Information**

WealthVisors does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$500 in fees six or more months in advance. Therefore, we are not required to include a financial statement with this brochure. WV has not filed a bankruptcy petition at any time in the past ten years.

Item 19 | **Requirements for State-Registered Advisers**

Educational Background and Business Experience of Principal Officer

The Managing Member of WealthVisors is Tyler Chianelli. Information regarding the education and business experience of the firm's principal officer is included in the Brochure Supplement: Form ADV Part 2B.

Other Business Activities of Principal Officer

The principal officer of WealthVisors has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations and in the Form ADV 2B - Brochure Supplement (attached herein).

Performance Fee Calculations

WealthVisors does not charge performance-based fees for its investment advisory services. The fees charged by WealthVisors are as described in Item 5 - Fees and Compensation in this brochure and are not based upon the capital appreciation of the funds or securities held by any client.

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding WealthVisors LLC nor any of its advisory persons. Neither WealthVisors nor its advisory persons has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against WealthVisors or any of its advisory persons.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding WealthVisors or its advisory persons

Material Relationships with Issuers of Securities

Neither WealthVisors nor its advisory persons has any relationships or arrangements with issuers of securities.