

# Witt Financial Group, LLC

## Firm Brochure

*This brochure provides information about the qualifications and business practices of Witt Financial Group, LLC. If you have any questions about the contents of this brochure, please contact us at (931) 484-4911 or by email at: [mark@wittfinancialgroup.com](mailto:mark@wittfinancialgroup.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 Witt Financial Group, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Witt Financial Group, LLC's CRD number is: 156462*

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

Version Date: 4/24/2017

## **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Witt Financial Group, LLC on 1/23/16 are described below. Material changes relate to Witt Financial Group, LLC's policies, practices or conflicts of interests.

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

This firm has been in business since January 2011, and the principal owner is Mark Hobert Witt.

### **B. Types of Advisory Services**

Witt Financial Group, LLC (hereinafter "WFG") offers the following services to advisory clients:

#### ***Selection of Other Advisers***

WFG does not provide investment management services. WFG will direct clients to third party investment advisers. Before selecting third party investment advisers for clients, WFG will always ensure those third party investment advisers are properly licensed or registered as investment adviser.

#### ***Financial Planning***

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

#### ***Services Limited to Specific Types of Investments***

WFG does not choose any specific type of investments for clients. Clients are referred to third party investment advisers for those services.

### **C. Client Tailored Services and Client Imposed Restrictions**

WFG offers the same suite of services to all of its clients. WFG creates an investment policy statement for each client to use in the selection of third party investment advisers and the distribution of funds between each adviser as appropriate. Clients are allowed to restrict certain types of investments or monies to certain third party investment advisers. However, if client's restrictions are determined by WFG to not allow the adviser to adequately provide the services of the adviser's business model or are deemed by the adviser to not allow WFG to meet the firm's fiduciary standard of care to the client, WFG reserves the right to terminate the client/adviser relationship.

### **D. Wrap Fee Programs**

WFG does not participate in any wrap fee programs.

## **E. Amounts Under Management**

WFG has assets under management totaling \$ 28,368,120.

# **Item 5: Fees and Compensation**

## **A. Fee Schedule**

### *Selection of Other Advisers Fees*

WFG may direct and administer client assets to third party investment advisers and will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between WFG and each third party adviser. The fees shared are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third party investment advisers will depend on the specific third party adviser selected.

### *Financial Planning Fees*

#### **Fixed Fees**

The rate for creating client financial plans is between \$495 and \$2000. The fee may be negotiable in WFG's discretion and the final fee schedule will be provided in the Financial Planning Agreement.

#### **Hourly Fees**

The hourly fee for these services is \$250. The fee may be negotiable in WFG's discretion and the final fee schedule will be provided in the Financial Planning Agreement.

## **B. Payment of Fees**

### *Payment of Selection of Other Advisers Fees*

For services recommended by dually registered IARs for another RIA firms offerings, the timing, frequency, and method of paying fees for selection of third party investment advisers will depend on the specific third party investment adviser selected and will be disclosed to the client prior to entering into a relationship with the third party investment adviser.

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

## ***Payment of Financial Planning Fees***

Fixed and Hourly Financial Planning fees are paid via check or credit card. Fees are paid in advance.

### **C. Clients Are Responsible For Third Party Fees**

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by WFG. Please see Item 12 of this brochure regarding broker/custodian.

### **D. Prepayment of Fees**

WFG collects fees in advance. Refunds for fees paid in advance will be returned within a reasonable amount of time to the client via check, or return deposit back into the client's account.

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

For services recommended by dually registered IARs for another RIA firms offerings, the timing, frequency, and method of paying fees for the selection of other third party investment advisers will depend on the specific third party adviser selected and will be disclosed to the client prior to entering into a relationship with the third party adviser.

For all asset based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate\* times the number of days elapsed in the billing period up to and including the day of termination. (\*The daily rate is calculated by dividing the annual asset-based fee by 365.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

### **E. Outside Compensation For the Sale of Securities to Clients**

Neither WFG nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

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

## **Item 7: Types of Clients**

WFG generally provides services to the following Types of Clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

### ***Minimum Account Size***

There is an account minimum, \$50,000, which may be waived by the investment adviser, based on the needs of the client and the complexity of the situation.

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

### **A. Methods of Analysis and Investment Strategies**

#### ***Methods of Analysis***

WFG will direct and administer client assets to third party investment advisers for investment services. These third party investment advisers may use a variety of analysis methods which will be fully disclosed on the third party investment advisers' disclosure documents which each client will receive at the onset of WFG and the client's relationship. Since WFG does not invest client funds in securities directly, it does not employ a specific method of analysis beyond the matching of clients with third party investment advisers who match client's investment profiles.

#### ***Investment Strategies***

**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **B. Material Risks Involved**

WFG will direct and administer client assets to third party investment advisers for investment services. The material risks involved will be fully disclosed on the third party investment advisers' disclosure documents which each client will receive at the onset of WFG and the client's relationship.



**Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

### **C. Risks of Specific Securities Utilized**

WFG will direct and administer client assets to third party investment advisers for investment services. However, WFG generally seeks third party investment advisers with investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

**Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

## **Item 10: Other Financial Industry Activities and Affiliations**

### **A. Registration as a Broker/Dealer or Broker/Dealer Representative**

Neither WFG nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

### **B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor**

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

### **C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests**

Mark H. Witt and Jordan M. Witt are licensed insurance agents. From time to time, they will offer clients advice or products from these activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser.

Mark H. Witt is part owner in Financial Gravity, a consulting firm offering tax planning and other services. Mr. Witt recommends that clients utilize Financial Gravity for tax planning and other services. The fees charged by Financial Gravity are separate and apart from those of the Firm. Mr. Witt receives compensation equal to 75% of the fee charged by Financial Gravity. Given his affiliation with Financial Gravity and the

compensation arrangement, Mr. Witt has an incentive to recommend Financial Gravity. You are under no obligation to utilize the services of Financial Gravity and may use the tax planning firm of your choice.

WFG always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of WFG in such individual's outside capacities.

#### **D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections**

WFG may direct clients to third party investment advisers. Clients will pay WFG its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between WFG and each third party adviser. In addition, IAR's of WFG may be dually registered with another RIA firm and may offer clients the services and investments from this other RIA firm. Selection of third party advisers or other RIA firms will never be based solely on compensation to the IAR. The fees will not exceed any limit imposed by any regulatory agency. WFG will always act in the best interests of the client, including when determining which third party investment adviser to recommend to clients. WFG will ensure that all recommended advisers are licensed or notice filed in the states in which WFG is recommending them to clients.

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

#### **A. Code of Ethics**

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

#### **B. Recommendations Involving Material Financial Interests**

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

### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of WFG may place a portion of their personal assets with the same third party investment advisers that they also recommend to clients. WFG will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar holdings are being bought or sold.

### **D. Trading Securities At/Around the Same Time as Clients' Securities**

From time to time, representatives of WFG or its representatives may buy or sell investments with third party investment advisers for themselves at or around the same time as clients. WFG will always put the client's interests above its own or any of its representatives and will assure that all client transactions are placed ahead of a firm or firm representatives transactions.

## **Item 12: Brokerage Practices**

### **A. Factors Used to Select Custodians and/or Broker/Dealers**

WFG will direct and administer client assets to third party investment advisers for investment services. These third party investment advisers typically have their own designated custodians or broker dealer firms. If for some reason an independent custodian is needed, a custodian will be chosen based on their relatively low transaction fees and access to the securities investments warranted by WFG then current business model. WFG will never charge a premium or commission on transactions, beyond the actual costs imposed by any Custodian.

WFG IAR's may also be dually registered with another RIA firm who utilizes other third party investment advisers.

The custodian may differ based on which third party investment adviser is chosen by the client.

#### ***1. Research and Other Soft-Dollar Benefits***

WFG receives no research, product, or service other than execution from a broker-dealer or third party in connection with client securities transactions ("soft dollar benefits").

#### ***2. Brokerage for Client Referrals***

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

### ***3. Clients Directing Which Broker/Dealer/Custodian to Use***

Since WFG only directs client assets to chosen third party investment advisers this point does not apply at this time. Custodians are chosen by the individual investment advisers selected.

#### **B. Aggregating (Block) Trading for Multiple Client Accounts**

Since WFG only directs client assets to chosen third party investment advisers this point does not apply at this time. Any block trading provisions would be specified by the investment adviser used and detailed in their disclosure documents.

## **Item 13: Reviews of Accounts**

#### **A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews**

WFG will direct and administer client assets to third party investment advisers for investment services. However, client accounts are reviewed periodically by Mark H. Witt, Managing Member. Clients may also receive periodic reports from the individual third party investment advisers. Details of these reports, if any, will be included in the investment adviser's disclosure documents.

#### **B. Factors That Will Trigger a Non-Periodic Review of Client Accounts**

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

#### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client will receive at least quarterly a written report detailing the client's account which may come from the custodian or third party investment adviser.

## **Item 14: Client Referrals and Other Compensation**

#### **A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)**

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

## **B. Compensation to Non – Advisory Personnel for Client Referrals**

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

### **Item 15: Custody**

WFG will direct and administer client assets to third party investment advisers for investment services. WFG does not take custody of client accounts at any time. Custody of client's accounts typically will be held primarily at the third party investment adviser(s)' custodian(s). Clients will receive account statements from the third party investment adviser and/or their custodian and should carefully review those statements.

### **Item 16: Investment Discretion**

For client accounts where WFG provides ongoing supervision, the client has given WFG written discretionary authority over the client's accounts with respect to what third party investment adviser will be used and the amount of client funds to be directed at any particular third party investment adviser. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides WFG discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the third party investment adviser and/or their custodian.

### **Item 17: Voting Client Securities (Proxy Voting)**

WFG will not ask for, nor accept voting authority for client securities. Clients may or may not receive proxies directly from the third party investment adviser used. Details of the third party investment advisers' proxy voting policies are included in the adviser's disclosure documents.

### **Item 18: Financial Information**

#### **A. Balance Sheet**

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

**B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients**

Neither WFG nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

**C. Bankruptcy Petitions in Previous Ten Years**

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

**Item 19: Requirements For State Registered Advisers**

**A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background**

WFG currently has only one management person/executive officer; Mark H. Witt. Mark H. Witt's education and business background can be found on the Supplemental ADV Part 2B form.

**B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)**

Other business activities for each relevant individual can be found on the individual's Form ADV Part 2B brochure supplement.

**C. How Performance Based Fees are Calculated and Degree of Risk to Clients**

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

**D. Material Disciplinary Disclosures for Management Persons of this Firm**

No management person at WFG has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

**E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)**

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

*This brochure supplement provides information about Mark H. Witt that supplements the Witt Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Mark H. Witt, Managing Member if you did not receive Witt Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Mark H. Witt is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Witt Financial Group, LLC**

**Form ADV Part 2B – Individual Disclosure Brochure**

*for*

### **Mark Hobert Witt**

Personal CRD Number: 4533105

Investment Adviser Representative

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Crossville, TN 38555  
(931) 484-4911  
[mark@wittfinancialgroup.com](mailto:mark@wittfinancialgroup.com)  
[www.wittfinancialgroup.com](http://www.wittfinancialgroup.com)

UPDATED: 4/26/2016



## Item 2: Educational Background and Business Experience

**Name:** Mark H. Witt

**Born:** 1956

### Education Background and Professional Designations:

#### Education:

Attended University of Tennessee

#### Business Background:

04/2011 – Present	Managing Member & CCO Witt Financial Group, LLC
01/2003 – Present	Managing Member Witt Financial Group, LLC
02/2011 – 09/2013	Managing Member JMW Capital Partners, LLC
12/2008 – 12/2010	Registered Representative/IAR PlanMember Securities Corporation

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Mark H. Witt is dually registered as an investment adviser representative with Witt Financial Group, LLC, a state registered investment adviser, and Wealth Financial Advisory Services, LLC, an SEC registered investment adviser and may offer services, when appropriate, from both firms. Full disclosure of all services and fees will be provided to the client from each firm as appropriate.

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

Mark H. Witt is part owner in Financial Gravity, a consulting firm offering tax planning and other services. Mr. Witt recommends that clients utilize Financial Gravity for tax planning and other services. The fees charged by Financial Gravity are separate and apart from those of the Firm. Mr. Witt receives compensation equal to 75% of the fee charged by Financial Gravity. Given his affiliation with Financial Gravity and the compensation arrangement, Mr. Witt has an incentive to recommend Financial Gravity. You are under no obligation to utilize the services of Financial Gravity and may use the tax planning firm of your choice.

### **Item 5: Additional Compensation**

Other than salary, annual bonuses, regular bonuses, Mark H. Witt does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Witt Financial Group, LLC.

### **Item 6: Supervision**

As the only owner and a representative of Witt Financial Group, LLC, Mark H. Witt supervises all duties and activities. Mark H. Witt's contact information is on the cover page of this disclosure document. Mark H. Witt adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

### **Item 7: Requirements For State Registered Advisers**

*This disclosure is required by Tennessee securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

A. Mark H. Witt has **NOT** been involved in any of the events listed below.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Mark H. Witt has **NOT** been the subject of a bankruptcy petition at any time.

*This brochure supplement provides information about Jordan M. Witt that supplements the Witt Financial Group, LLC brochure. You should have received a copy of that brochure. Please contact Mark H. Witt, Managing Member, if you did not receive Witt Financial Group, LLC's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Jordan M. Witt is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

## **Witt Financial Group, LLC**

Form ADV Part 2B – Individual Disclosure Brochure

*for*

### **Jordan Marcus Witt**

Personal CRD Number: 6124645

Investment Adviser Representative

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93 Highway 70 East, Suite 1  
Crossville, TN 38555  
(931) 484-4911  
[Jordan@wittfinancialgroup.com](mailto:Jordan@wittfinancialgroup.com)  
[www.wittfinancialgroup.com](http://www.wittfinancialgroup.com)

UPDATED: 5/1/2015

## Item 2: Educational Background and Business Experience

**Name:** Jordan M. Witt

**Born:** 1987

### Education Background and Professional Designations:

#### Education:

Bachelor of Science from East Tennessee State University

#### Business Background:

07/2014 - Present	Investment Adviser Representative Witt Financial Group, LLC
06/2011 - Present	Associate Witt Financial Group, LLC
08/2006 - 05/2011	Student East Tennessee State University

## Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

## Item 4: Other Business Activities

Jordan M. Witt is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Witt Financial Group, LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of Witt Financial Group, LLC in such individual's outside capacities.

## Item 5: Additional Compensation

Other than salary, annual bonuses, regular bonuses, Jordan M. Witt does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Witt Financial Group, LLC.

## Item 6: Supervision

As a representative of Witt Financial Group, Jordan M. Witt works closely with supervisor Mark H. Witt, and all advice provided to clients is reviewed by this supervisor prior to implementation. Mark Witt can be reached at (931) 484-4911. Jordan M. Witt adheres to all required regulations regarding the activities of an Investment Adviser Representative and follows all policies and procedures outlined in the firm's policies and procedures manual, including the Code of Ethics, and appropriate securities regulatory requirements.

## Item 7: Requirements For State Registered Advisers

*This disclosure is required by Tennessee securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.*

- A. Jordan M. Witt has **NOT** been involved in any of the events listed below.
1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
    - a) an investment or an investment-related business or activity;
    - b) fraud, false statement(s), or omissions;
    - c) theft, embezzlement, or other wrongful taking of property;
    - d) bribery, forgery, counterfeiting, or extortion; or
    - e) dishonest, unfair, or unethical practices.
- B. Jordan M. Witt has **NOT** been the subject of a bankruptcy petition at any time.

# Witt Financial Group, LLC

93 Highway 70 East, Suite 1 Crossville, Tennessee 38555  
(931) 484-4911 mark@wittfinancialgroup.com

## PRIVACY POLICY

Investment Advisers are required by law to inform their clients of their policies regarding privacy of client information. We are bound by professional standards of confidentiality that are even more stringent than those required by law. Federal law gives customers the right to limit some but not all sharing of personal information. It also requires us to tell you how we collect, share, and protect your personal information.

### TYPES OF NONPUBLIC PERSONAL INFORMATION (NPI) WE COLLECT

We collect nonpublic personal information about you that is either provided to us by you or obtained by us with your authorization. This can include but is not limited to your Social Security Number, Date of Birth, Banking Information and Financial Account Numbers and/or Balances, Sources of Income, Credit Card Numbers or other Information. When you are no longer our customer, we may continue to share your information only as described in this notice.

### PARTIES TO WHOM WE DISCLOSE INFORMATION

All Investment Advisers may need to share personal information to run their everyday business. In the section below, we list the typical reasons that we may share your personal information:

- For everyday business purposes – such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations, or report to credit bureaus;
- For our marketing – to offer our products and services to you;
- For joint marketing with other financial companies;
- For our affiliates' everyday business purposes – information about your transactions and experiences; or
- For non-affiliates to market to you.

Clients may opt out of sharing information for joint marketing to other financial companies, to our affiliates and to non-affiliates. If you are a new customer we may

begin sharing your information on the day you sign our agreement. When you are no longer our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

### PROTECTING THE CONFIDENTIALITY OF CURRENT AND FORMER CLIENT'S INFORMATION

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law, including computer safeguards and secured files and building.

### FEDERAL LAW GIVES YOU THE RIGHT TO LIMIT SHARING - OPTING OUT

Federal law allows you the right to limit the sharing of your NPI by "opting-out" of the following: sharing for affiliates' everyday business purposes – information about your creditworthiness; sharing with affiliates who use your information to market to you; or sharing with non-affiliates to market to you. State laws and individual companies may give you additional rights to limit sharing. Please notify us immediately at our address or telephone number if you choose to opt out of these types of sharing.

**DEFINITIONS:** Affiliates – companies related by common ownership or control. They can be financial and nonfinancial companies; Non-affiliates – companies not related by common ownership or control. They can be financial and nonfinancial companies; Joint marketing – a formal agreement between non-affiliated financial companies that together market financial products or services to you.

*Please call if you have any questions. Your privacy, our professional ethics, and the ability to provide you with quality financial services are very important to us.*