Item 1 Cover Page

Wealth Quarterback, LLC

CRD Number: 282967

Brochure Dated: March 30, 2026

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Contact: Thomas J. Clancy, Chief Compliance Officer

This Form ADV Part 2A ("Firm Brochure") provides information about the qualifications and business practices of Wealth Quarterback, LLC. If you have any questions about the contents of this brochure, please contact us at (732) 965-8190 ext. 101 or tclancy@jalinski.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 Wealth Quarterback, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Wealth Quarterback, LLC is 282967. References herein to Wealth Quarterback, LLC as a "registered investment adviser" or to being "registered" does not imply a certain level of skill or training.

Item 2 Material Changes

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

Since our last annual amendment filed March 31, 2025, the Firm has made the following material changes to the Brochure:

- Item 4: About - section F. Updated assets under management figures as of December 31, 2025.
- Item 8: Clarified certain disclosure language for accuracy and consistency with current advisory practices, including refinements to the description of investment strategies and risk disclosures.

There were no material changes to the Firm's advisory services, fee structure, commissions, compensation arrangements, or conflicts of interest during this period.

Questions?

WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions regarding this Part 2A brochure, including the changes mentioned above. A copy of our updated brochure and brochure supplements are available to you free of charge and may be requested by contacting us at (732) 965-8190 ext. 101 or tclancy@jalinski.com. Additional information about WQL is also available via the SEC's website www.adviserinfo.sec.gov. The IARD number for WQL is 282967. The SEC's website also provides information about any persons affiliated with WQL who are registered, or are required to be registered, as Advisory Representatives of WQL.

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Item 4 Advisory Business

A. ABOUT THE BUSINESS

Wealth Quarterback LLC (“WQL”) is a Limited Liability Company investment advisory firm organized in the State of Delaware. The owner of Wealth Quarterback LLC is Resurrection Holdings, LLC. Josh Jalinski is CEO of Wealth Quarterback LLC and as CEO, Josh Jalinski has principal decision authority. WQL was registered with the State of New Jersey from 2016 to 2019. WQL has been registered with the Securities and Exchange Commission (“SEC”) since June 2019.

Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "WQL", "we," "our," "us" and the “Firm” refer to Wealth Quarterback, LLC and the words "you," "your," and "client" refer to you as either a client or prospective client of our Firm.

B. INVESTMENT ADVISORY SERVICES

WQL provides discretionary investment advisory services to individuals, high net-worth individuals, charitable organizations and pension and profit-sharing plans (see below). Before engaging WQL to provide investment advisory services, clients are required to enter into an agreement with WQL setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the fees that a client will incur (see fee schedule at Item 5 below). WQL provides investment advisory services specific to the needs of each client.

Before providing investment advisory services, WQL will ascertain the client’s investment objective(s). WQL will then allocate (or recommend that the client allocate) the portfolio consistent with the designated investment objective(s). To the extent specifically requested, and separately engaged to provide same, by an individual client, WQL will generally provide financial planning and consulting services.

SELECTION OF OTHER ADVISERS

WQL may also direct clients to unaffiliated, third-party investment advisers to manage all or a portion of the client's assets. Responsibility for determining whether services from a third-party investment adviser are appropriate for a particular client is vested exclusively with WQL.

FINANCIAL PLANNING

To the extent requested by a client, WQL also provides financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis.

Before engaging WQL to provide planning or consulting services, clients are required to enter into a Financial Planning and Consulting Agreement with WQL setting forth the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the client before WQL commences services. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from WQL. If the client engages any such recommended professional, and a dispute arises thereafter regarding an engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

It remains the client's responsibility to promptly notify WQL if there is ever any change in their financial situation or investment objectives for the purpose of WQL revising its previous recommendations or services.

ERISA PLAN ENGAGEMENTS

WQL may be engaged to provide investment advisory services to ERISA retirement plans ("Plan"), whereby the Firm shall manage Plan assets consistent with the investment objective designated by the Plan sponsor. In such engagements, the Firm will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA"). The Firm will generally provide services on an "assets under management" fee basis per the terms and conditions of an Investment Advisory Agreement between the Plan and the Firm.

WQL may also provide investment advisory services to participant directed retirement plans per the terms and conditions of a Retirement Plan Consulting Agreement between WQL and the plan. For such engagements, WQL shall assist the Plan with the selection of an investment platform from which Plan participants shall make their respective investment choices, and, to the extent engaged to do so, may also provide corresponding education to assist the participants with their decision-making process.

FINANCIAL EDUCATION SEMINARS

WQL conducts financial education seminars on topics such as tax efficient retirement income, cash balance plans, retirement planning, etc. We may partner with an insurance company, estate planning attorney, and other professionals to offer these seminars. Seminar participants may subsequently choose to participate in a complimentary initial consultation with us. The consultation generally will consist of a broad review of your financial situation, issues, and concerns. We will also explain the services we offer.

MISCELLANEOUS

Limitations of Financial Planning and Non-Investment Consulting and Implementation Services. As indicated above, to the extent requested by a client, WQL provides financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. *We do not serve as an attorney or accountant, and no portion of our services should be construed as same.* Accordingly, we do not prepare estate planning documents or tax returns.

To the extent requested by a client, we may recommend the services of other professionals for certain non- investment implementation purposes (i.e. attorneys, accountants, insurance, etc.), including WQL's representatives in their separate individual capacities as representatives of Purshe Kaplan Sterling Investments ("PKS"), an SEC registered and FINRA member broker-dealer, and as licensed insurance agents of Jalinski Advisory Group, Inc. ("Jalinski Insurance"), WQL's affiliated insurance agency. Theclient is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from WQL and/or its representatives.

If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

The recommendation by WQL that a client purchase a securities or insurance commission product through WQL's representatives in their separate individual capacities as representatives of PKS or as an insurance agent of "Jalinski Insurance", presents a conflict of interest, as the receipt of commissions provides an incentive to recommend investment and /or insurance products based on commissions (including overrides) to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products from any insurance agents of Jalinski Insurance. Please refer to Item 10 for additional details.

Clients are reminded that they may purchase securities and insurance products recommended by WQL through other, non-affiliated broker-dealers and/or insurance agencies. WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Clients transitioning from a broker-dealer to an investment adviser contract will experience billing changes. Broker-dealer customers with mutual funds held for a long period will have changes in the way the services are billed under the investment adviser agreement. Our Fees are covered in the next section in Item 5 Fees

Independent Managers/Sub-Advisors. WQL may also allocate (or recommend that the client allocate) a portion of a client's investment assets among unaffiliated independent investment managers and/or sub-advisors ("Independent Manager(s)") in accordance with the client's designated investment objective(s). In such situations, the Independent Manager(s) shall have day-to-day responsibility for the active discretionary management of the allocated assets.

WQL shall continue to render investment supervisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors which WQL shall consider in recommending Independent Manager(s) include the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

The investment management fee charged by the Independent Manager(s) is separate from, and in addition to, WQL's advisory fee as set forth in the fee schedule at Item 5 below. An exception may occur when WQL serves as a solicitor for an Independent Manager, in which event WQL shall not receive an advisory fee as set forth in the fee schedule at Item 5 below. Rather, WQL shall receive a disclosed portion of the Independent Manager's investment management fee charged to the client.

Rollovers. A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted; (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted; (iii) roll over to an Individual Retirement Account ("IRA"); or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If WQL recommends that a client roll over their retirement plan assets into an account to be managed by WQL, such a recommendation creates a conflict of interest if WQL will earn an advisory fee on the rolled over assets. No client is under any obligation to rollover retirement plan assets to an account managed by WQL. WQL'S Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

If the client is: (i) a participant or beneficiary of a Plan subject to Title I of the Employee Retirement Income Security Act of 1974 ("ERISA") or described in section 4975(e)(1)(A) of the Internal Revenue Code, with

authority to direct the investment of assets in his or her Plan account or to take a distribution; (ii) the beneficial owner of an IRA acting on behalf of the IRA; or (iii) a Retail Fiduciary with respect to a plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code, then WQL represents that it and its representatives are fiduciaries under ERISA or the Internal Revenue Code, or both, with respect to any investment advice provided by WQL or its representatives or with respect to any investment recommendations regarding an ERISA Plan or participant or beneficiary account.

Custodians for Advisor Accounts. As discussed below at Item 12, unless the client directs otherwise, WQL shall generally recommend that Fidelity, Charles Schwab, Interactive Brokers, or Nationwide, serve as the broker-dealer/custodian for client investment advisory assets. Broker-dealers/custodians charge brokerage commissions and/or transaction fees for effecting securities transactions. In addition to WQL's investment management fee, brokerage commissions and/or transaction fees, clients will also incur, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses).

Orion Advisor Technology. WQL has engaged Orion Performance Reporting for enhanced client performance reporting and other administrative services. Clients are subscribed to Orion Performance reporting. Clients can access Orion performance reporting online portal upon request to review portfolio holdings, performance, and other portfolio attributes. Market values in Orion are typically updated daily and include accrued interest and accrued dividends. Client custodian accounts are reconciled daily by Orion. Clients will be subject to a technology fee totaling 35 dollars annually per account billed 8.75 quarterly.

Mutual Funds. Most mutual funds are available directly to the public. Thus, a prospective client can obtain many of the mutual funds that may be recommended and/or utilized by WQL independent of engaging WQL as an investment advisor. However, if a prospective client determines to do so, they will not receive WQL's initial and ongoing investment advisory services. Where the client chooses to engage WQL as an investment advisor such mutual fund fees are separate from and in addition to the advisory fee charged by WQL.

Portfolio Activity. WQL has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, WQL will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, mutual fund manager tenure, style drift, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when WQL determines that changes to a client's portfolio are neither necessary nor prudent. Of course, as indicated below, there can be no assurance that investment decisions made by WQL will be profitable or equal any specific performance level(s).

Client Obligations. In performing our services, WQL shall not be required to verify any information received from the client or from the client's other professionals and WQL is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify WQL if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising our previous recommendations and/or services.

Cash Sweep Accounts. Certain account custodians can require that cash proceeds from account transactions or new deposits, be swept to and/or initially maintained in a specific custodian designated sweep account. The yield on the sweep account will generally be lower than those available for other money market accounts. When this occurs, to help mitigate the corresponding yield dispersion, WQL shall (usually within 30 days thereafter) generally (with exceptions) purchase a higher yielding money market fund (or other type security) available on the custodian's platform, unless WQL reasonably anticipates that it will utilize the cash proceeds during the subsequent 30-day period to purchase additional investments for the client's account. Exceptions and/or modifications can and will occur with respect to all or a portion of the cash balances for various reasons, including, but not limited to the amount of dispersion between the sweep account and a money market fund, an indication from the client of an imminent need for such cash, or the client has a demonstrated history of writing checks from the account. Please Note: The above does not apply to the cash component maintained within a WQL actively managed investment strategy (the cash balances for which shall generally remain in the custodian designated cash sweep account), an indication from the client of a need for access to such cash, assets allocated to an unaffiliated investment manager, and cash balances maintained for fee billing purposes. Please Also Note: The client shall remain exclusively responsible for yield dispersion/cash balance decisions and corresponding transactions for cash balances maintained in any WQL unmanaged accounts. ANY QUESTIONS: WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above.

Investment Risk. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by WQL) will be profitable or equal any specific performance level(s).

C. TAILORED PROGRAMS

WQL will tailor a program for each individual client. Before providing investment management services, an investment adviser representative will ascertain each client's investment objectives. WQL will then allocate investment assets consistent with the client's investment objectives. The client may, at any time, impose reasonable restrictions, in writing, on WQL's services. WQL may use a financial software Leap Pro which is owned by Penn Mutual. www.leapcp.com

D. WRAP FEE PROGRAM

WQL does not participate in or sponsor a wrap fee program.

E. ASSETS UNDER MANAGEMENT

As of December 31, 2025, WQL manages $ 391,326,903 on a discretionary basis and $ 2,174,986 on a non-discretionary basis.

Item 5 Fees and Compensation

A. FEES

Clients can engage WQL to provide discretionary investment management services. WQL's negotiable, annual investment advisory fee is based upon a percentage (%) of the market value of the assets under WQL's management and ranges from 1.00% to 1.75% annually. Our fees include a base investment management fee of 1% to 1.25% plus an additional fee based on the strategy you are invested in. Clients pay 50 basis points more for our tactical managed strategy, which is discussed in more detail below. Clients utilizing WQL's Tactical Managed Strategy ("TMS") strategy will be charged the annual investment advisory fee *plus* an additional annual fee of 0.50% not to exceed 1.75%. Please see Item 8 of this Firm Brochure for more information regarding WQL's TMS.

WQL shall price its services based upon various objective and subjective factors. As a result, WQL's clients could pay diverse fees based upon the market value of their assets, the complexity of the engagement, and the level and scope of the overall investment advisory services to be rendered. As a result of these factors, similarly situated clients could pay diverse fees, and the services to be provided by WQL to any particular client could be available from other advisers at lower fees. All clients and prospective clients should be guided accordingly.

Please Note: **Cash Positions** – WQL continues to treat cash as an asset class used for liquidity and defensive purposes in client accounts. As such, unless determined to the contrary by WQL, all cash positions (e.g., money markets, etc.) shall continue to be included as part of assets under management for purposes of calculating WQL's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions or events, and there being no guarantee that such anticipated market conditions or events will occur, WQL may maintain cash positions for liquidity and defensive purposes. In addition, while assets are maintained in cash, such amounts could miss market advances. Depending upon current yields, at any point in time, WQL's advisory fee could exceed the interest paid by the client's money market fund.

These fees are negotiable, and the final fee schedule is attached as an exhibit to the Investment Advisory Contract.

SELECTION OF OTHER ADVISERS

WQL will be compensated via a fee share from the advisers to which it directs certain clients. The fees shared will not exceed any limit imposed by any regulatory agency. Any fee and the percentage that WQL will receive will be set forth in a separate agreement between the Client and WQL or the Client and the other Adviser.

FINANCIAL PLANNING

Fees for financial planning services offered by WQL can either be a fixed fee or an hourly fee. In either instance, the fee is negotiable depending upon the complexity and scope of the plan, your financial situation, and your objectives. We do not require you to pay fees six or more months in advance. Should the engagement last longer than six months between acceptance of financial planning agreement and delivery of the financial plan, any prepaid unearned fees will be promptly returned to you less a pro rata charge for bona fide financial planning services rendered to date.

For clients requesting basic financial planning services, and who are also engaged under an Investment

Advisory Agreement, WQL may, at its sole discretion, waive the fee related to financial planning services. The decision by WQL to waive a financial planning fee is based on several subjective and objective factors, including the complexity of the plan and the amount of assets placed under WQL's management. The negotiated fixed rate for creating stand-alone client financial plans is between $200 and $50,000. The negotiated hourly fee for these services is between $200 and $1,000.

FINANCIAL EDUCATION SEMINARS

Educational seminars are provided at no charge to participants.

B. BILLING

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a daily, monthly, or quarterly basis, in advance or in arrears, as detailed below.

Fees for selection of other advisers are paid according to the terms and conditions of the agreement between the Client and the other adviser. In the event there is no agreement between the Client and the third-party adviser, the fees will be paid pursuant to the WQL Investment Advisory Contract, and the terms and conditions discussed above regarding the fees related to Investment Advisory Services.

Financial planning fees are paid via check, cash, and wire. Financial planning fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan.

C. OTHER FEES AND EXPENSES

As discussed below, unless the client directs otherwise or an individual client's circumstances require, WQL shall generally recommend that Fidelity, Charles Schwab, Interactive Brokers, or Nationwide serve as the custodian for client assets. Broker-dealers such as these charge brokerage commissions and transaction fees for effecting certain securities transactions (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions).

In addition to WQL's fee, and the brokerage commissions and transaction fees charged by the custodians, clients will also incur, charges imposed at the fund level for all mutual fund and exchange traded fund purchases, (e.g. management fees and other fund expenses). Clients will be subject to additional fees from Orion for the use of such services, as described in Item 4 above.

D. ADVANCE FEES AND TERMINATION

For client accounts maintained with Interactive Brokers LLC, WQL uses an Annualized Percentage of Net Liquidation Value applied on a Daily basis for purposes of determining the client's advisory fee. This means that client fees are determined using an annualized percentage fee based on the net liquidation value of the account, applied on a daily, monthly, or quarterly basis. Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization.

For client accounts maintained with Nationwide, WQL's annual investment advisory fee is prorated and paid quarterly, in arrears, based upon the average daily account value of the assets over the course of the fee period. For client accounts maintained with Fidelity and Charles Schwab, WQL's annual investment advisory fee is prorated and paid quarterly in advance.

Either party may terminate the Investment Advisory Contract upon written notice. Termination may result in termination fees to be charged by the client's custodian, separate and apart from any fees that may be owed to WQL. Clients are advised to read their custodial agreements carefully for more details.

In the event that WQL collects fees in advance, refunds for fees paid in advance will be returned to the client via check or return deposit back into the client's account. For clients with assets held at Interactive Brokers, 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 rate by 252.). For clients with assets held at Fidelity and Charles Schwab, clients who terminate in the middle of a billing period will be refunded a portion of their prepaid advisory fee, prorated for the number of days remaining in the billing period from the date of termination. In example if a person was serviced for 30 days in a quarter that has 90 days. The total fee charged is divided by the number of days in the quarter 90 and then multiplied by the number of days serviced 30 which is deducted from the fee charged in advance, the difference is the amount of the refund to the client.

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. COMPENSATION FOR INVESTMENT PRODUCTS

Certain of WQL's investment adviser representatives, in their individual capacities, may act as registered representatives of Purshe Kaplan Sterling Investments ("PKS"), a FINRA member broker-dealer, to implement investment recommendations on a commission basis. In the event the client chooses to purchase investment products through PKS, PKS will charge brokerage commissions to effect securities transactions, a portion of which will be paid to the WQL investment adviser representative acting within their capacity as a registered representative of PKS. The brokerage commissions charged by PKS may be higher or lower than those charged by other broker-dealers. In addition, PKS, as well as WQL's Representatives, relative to commission mutual fund purchases, will also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment. The recommendation that a client purchase a commission product from PKS presents a conflict of interest, as the receipt of commissions provides an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need.

No client is under any obligation to purchase any commission products from PKS representatives. WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest. Clients may purchase investment products recommended by WQL through other, non-affiliated broker dealers or agents. When WQL's representatives sell an investment product or commodity on a commission basis in their capacity as a PKS registered representative, WQL does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, WQL's representatives do not also receive commission compensation for such advisory services.

Item 6 Performance-Based Fees and Side-by-Side Management

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the Fees and Compensation section above and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

WQL generally provides advisory services to the following types of clients:

- Individuals,
- High-Net-Worth Individuals,
- Charitable Organizations Pension, and Profit-Sharing Plans.

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

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

METHODS OF ANALYSIS

WQL's methods of analysis include Charting analysis, Cyclical analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis, and Technical analysis.

Charting analysis involves the use of patterns in performance charts. WQL uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security. Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security. Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset. Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on. Technical analysis involves the analysis of past market data, primarily price volume and momentum.

INVESTMENT STRATEGIES

WQL uses long term trading and short-term trading as its general investment strategies and to a much more limited extent may engage in short sales and options trading (including covered options, uncovered options, or spreading strategies). WQL also utilizes cash strategies. Occasionally, WQL may utilize cryptocurrencies, as well as leveraged and inverse ETFs.

WQL also extends to clients the option to utilize a Tactical Managed Strategy ("TMS"), which utilizes leveraged and inverse ETFs. TMS is aggressive and speculative in nature and not available to or suitable for all investors. TMS was created for those who are concerned about the possibility of a bear market and concerned with increased government debt and the changing political environment. TMS utilizes

market timing, a strategy of making buy or sell decisions through an assessment of market conditions resulting from fundamental, quantitative, or technical analysis and time series forecasting to guide us in the timing of buying and selling of securities.

TMS is long/short strategy, the strategy consists of selection, market timing, and additional risk management services. The assets will be a mix of exchange-traded funds (ETFs), exchange-listed stocks, mutual funds, index funds, and bonds. The assets will reflect a broad range of investment opportunity and risk and may incorporate leveraged ETFs or inverse ETFs depending on market conditions.

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

B. RISKS

Every method of analysis has its own inherent risks. To perform an accurate market analysis WQL must have access to current/new market information. WQL has no control over the dissemination rate of market information; therefore, unbeknownst to WQL, certain analyses may be compiled with outdated market information, severely limiting the value of WQL's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

WQL's primary investment strategies detailed above are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy. Trading an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period involves a very short investment time period but will incur higher transaction costs when compared to a short-term investment strategy and substantially higher transaction costs than a longer-term investment strategy.

In addition to the fundamental investment strategies discussed above, WQL, on a limited basis, may also implement and/or recommend – short selling, use of margin, and/or options transactions. Each of these strategies has a high level of inherent risk.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

Margin transactions allows the borrowing of funds from the Custodian for the purpose of purchasing securities. The loan is collateralized by the securities and cash in your account. A margin interest rate is charged by the Custodian on the funds borrowed. If the value of the securities held in your margin account drops sufficiently, you will be required to deposit more cash or sell a portion of the stock to meet margin requirements. Because of this, there is risk that the losses from a margin transaction may exceed the original amount invested or exceed the funds deposited in the account.

WQL strategies generally do not involve trading an account into margin.

Short Sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward. WQL's use of short sales and

options trading generally holds greater risk of capital loss.

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

An inverse ETF generally seeks to deliver the opposite of the daily performance of the index or benchmark that it tracks. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some ETFs are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse ETFs use a range of investment strategies, including swaps, futures contracts and other derivative instruments.

ETFs (including leveraged, inverse, and leveraged inverse) trade on an auction market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. A significant amount of principal could be lost in these securities rapidly and tax laws could change and affect the tax treatment of this investment.

Non-traditional ETFs, including leveraged and inverse ETFs, are not suitable for most investors. Non-traditional ETFs are trading vehicles in which daily rebalancing and market volatility have a significant impact on the realized return. The effects of mathematical compounding can grow significantly over time, leading to scenarios whereby performance over the long run can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. Leveraged, inverse, and leveraged inverse ETFs are more volatile and riskier than traditional ETFs due to their exposure to leverage and derivatives, particularly total return swaps and futures. In addition, these instruments are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis. Holding leveraged, inverse, and leveraged inverse ETFs for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Non-traditional ETFs are volatile and not suitable for all investors. Positions in non-traditional ETFs should be monitored closely due to their volatile nature and inability to track the underlying index over an extended period of time. Non-traditional ETFs are not intended to be held long term. ETFs over a period longer than one day can differ significantly from their stated performance objectives.

Exchange Traded Notes (ETNs): ETNs are senior unsecured debt obligations of an issuer, typically a bank or another financial institution; however, ETNs are not categorized as typical fixed income products. They have a maturity date and are backed only by the credit of the underwriting bank. ETNs are linked to the performance of a particular market benchmark(s) or strategy and upon maturity, the underwriting bank promises to pay the amount reflected in the benchmark index minus fees. ETNs are only linked to the performance of a benchmark, they do not actually own the benchmark index. ETNs also face the risk that the credit rating of the underwriting bank may be reduced or the underwriting bank may go bankrupt, thus reducing the value of the ETN. Even though ETNs are not equities or index funds, they may face some of the risks of investing in equities or index funds.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to have a contractual guarantee with an insurer to receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long- term investments for purposes of meeting retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do. Annuity payments, even those contractually guaranteed by the insurer, are always based on the paying ability of the insurer.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option

transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

Special purpose acquisition companies ("SPACs"): These investments are speculative, involve a higher degree of risk than more traditional investments, are not suitable for all investors and are intended for experienced and sophisticated investors who are willing to bear the high economic risk of the investment. A SPAC is a publicly traded company formed for the purpose of raising capital through an initial public offering to fund the acquisition, through a merger, capital stock exchange, asset acquisition or other similar business combination, of one or more operating businesses.

Following the acquisition of a target company, a SPAC typically would exercise control over the management of such target company in an effort to increase the value of such target company. Capital raised through the initial public offering of securities of a SPAC is typically placed into a trust until the target company is acquired or a predetermined period of time elapses. Investors in a SPAC would receive a return on their investment in the event that a target company is acquired and such target company's value increased. In the event that a SPAC is unable to locate and acquire target companies by the deadline, the SPAC would be forced to liquidate its assets, which could result in losses due to the expenses and liabilities of the SPAC.

Investors in a SPAC are subject to the risk that, among other things, (i) the SPAC is be able to locate or acquire target companies by the deadline, (ii) assets in the trust are subject to third party claims against the SPAC, which could reduce the per share liquidation price received by the investors in the SPAC, (iii) the SPAC is exempt from the rules promulgated by the SEC to protect investors in "blank check" companies, such as Rule 419 promulgated under the Securities Act, so that investors in such SPAC are not be afforded the benefits or protections of those rules, (iv) the SPAC is only able to complete one business combination, which causes it to be solely dependent on a single business, (v) the value of any target company decreases following its acquisition by the SPAC, (vi) the value of the funds invested and held in the trust decreases, (vii) the inability to redeem due to the failure to hold the securities in the SPAC on the record date or the failure to vote against the acquisition, (viii) the SPAC is unable to consummate a business combination, and as a result, public stockholders are forced to wait until the deadline before liquidating distributions are made, and (ix) redemption rights make the SPAC unattractive to targets or preclude the SPAC from completing a business combination. In addition, most SPACs are illiquid and have a concentrated shareholder base that tends to be comprised of hedge funds (at least at inception). At the time of investment, it is possible that a SPAC has not yet selected or approached any prospective target businesses with respect to a business combination. In those circumstances, there will likely be limited basis to evaluate the possible merits or risks of such SPAC's investment in any particular target business. To the extent that a SPAC completes a business combination, it will be affected by numerous risks inherent in the business operations of the acquired company or companies. Investment in SPAC sponsors are subject to additional risks, including the potential loss of the entire at-risk investment and the founder shares and warrants becoming worthless if no business combination is completed. For these and additional reasons, investments in SPACs and

SPAC sponsors are speculative and involve a high degree of risk.

Cryptocurrency Risk. Cryptocurrency, often referred to as "virtual currency", "digital currency," or "digital assets," operates as a decentralized, peer-to-peer financial exchange and value storage that is used like money. WQL's clients may have exposure to one or more cryptocurrencies, indirectly through an investment trust, a privately offered, open-end investment vehicle, or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Even indirectly, cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Certain cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments in these cryptocurrencies. Cryptocurrency can be manipulated, and transactions may be irreversible. Digital assets are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies.

Cryptocurrency Tax Risk. Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies.

Cybersecurity Risk The United States financial systems are subject to cyber security risk. Computer systems, cloud services, networks, and electronic devices, in use by WQL and its service providers which perform necessary business operations employ a variety of protections designed to prevent cyber threats. Despite the various protections in place cyber threats may cause real damage, interruption of service, unauthorized access to systems, theft of data, including personal and/or confidential data, slow systems, impacting performance, which could delay or stop transactions. A client could be negatively impacted as a result of a cybersecurity event, resulting in financial losses, violations of privacy, and reputational damage.

Structured Notes. Registrant may purchase Structured Notes for client accounts. A Structured Note is a financial instrument that combines two elements, a debt security and exposure to an underlying asset or assets. It is essentially a note, carrying counter party risk of the issuer. However, the return on the note is linked to the return of an underlying asset or assets (such as the S&P 500 Index or commodities). It is this latter feature that makes structured products unique, as the payout can be used to provide some degree of principal protection, leveraged returns (but usually with some cap on the maximum return), and be tailored to a specific market or economic view. Structured Notes will generally be subject to liquidity constraints, such that the sale thereof before maturity will be limited, and any sale before the maturity date could result in a substantial loss. There can be no assurance that the Structured Notes investment will be profitable, equal any historical performance level(s), or prove successful. **Please Note**: **If the issuer of the Structured Note defaults, the entire value of the investment could be lost.** In the event that a client has any questions regarding the purchase of Structured Notes for their account or would like to place restrictions on the purchase of Structured Notes for their accounts, Registrant's Chief Compliance Officer, Tom Clancy, remains available to address them.

Item 9 Disciplinary Information

WQL has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

A. BROKER-DEALER REGISTRATION

As disclosed above, some of WQL's representatives are also registered representatives of PKS, a FINRA member broker-dealer. Clients can choose to engage WQL's representatives, in their individual capacities, to effect securities brokerage transactions on a commission basis. The recommendation that a client purchase a commission product from PKS presents a conflict of interest, as the receipt of commissions provides an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need.

No client is under any obligation to purchase any commission products from PKS representatives. WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest. Clients may purchase investment products recommended by WQL through other, non-affiliated broker dealers or agents. When WQL's representatives sell an investment product or commodity on a commission basis in their capacity as a PKS registered representative, WQL does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, WQL's representatives do not also receive commission compensation for such advisory services.

B. NFA AND CFTC REGISTRATION

Neither WQL nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. OTHER MATERIAL RELATIONSHIPS

As disclosed above, some of WQL's representatives are licensed insurance agents with Jalinski Insurance, and from time to time, will offer clients advice or products from those activities on a commission basis. The recommendation by WQL that a client purchase a securities or insurance commission product from WQL's representatives in their separate individual capacities as representatives of Jalinski Insurance presents a conflict of interest, as the receipt of commissions, overrides or other compensation provides an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. To mitigate this conflict, WQL's representatives will only recommend such products when they believe it to be in the client's best interest.

Josh Adam Jalinski ("Mr. Jalinski"), WQL's CEO, is a member of the Million Dollar Round Table, a global insurance agent association. The Million Dollar Round Table grants membership to insurance agents who apply annually and have achieved certain production requirements as it relates to the commissions, premium or income earned. Mr. Jalinski's membership to the Million Dollar Round Table presents a conflict of interest, as he is incentivized to recommend investment and/or insurance products based on commissions to be received or premium charged, rather than on a particular client's need in order to retain his membership to the association.

No client is under any obligation to purchase insurance commission products from Jalinski Insurance representatives. Clients are reminded that they may purchase insurance products recommended by WQL through other, non-affiliated insurance agencies. WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.

Mr. Jalinski is also the owner of the Jalinski Tax Group ("Jalinski Tax") currently dormant. From time to time, he will offer clients advice or products from this activity. WQL always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Jalinski Tax in their capacity as an accountant. Jalinski Tax engages the services of one or more independent CPAs to offer tax preparation services to WQL's clients. These CPAs have, in the past, and may in the future, refer clients to WQL. There is no fee sharing arrangement between WQL and the engaged CPAs. Regardless, the relationship between WQL and the engaged CPAs presents a conflict of interest for WQL when recommending Jalinski Tax and/ or the independent CPAs to WQL's clients. No client is under any obligation to engage Jalinski Tax or any of the independent CPAs working in conjunction with Tax.

Josh Adam Jalinski is Radio Host of the Financial Quarterback, a weekly information radio show.

D. SELECTION OF OTHER INVESTMENT ADVISERS

WQL may direct clients to third-party investment advisers to manage all or a portion of the client's assets. WQL 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 WQL and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that WQL has an incentive to direct clients to the third-party investment advisers that provide WQL with a larger fee split. WQL will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. WQL will ensure that all recommended advisers are licensed, or notice filed in the states in which WQL is recommending them to clients.

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

A. DESCRIPTION OF CODE OF ETHICS

WQL has 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. WQL's Code of Ethics is available at no cost, upon request from any current or prospective client.

B. MATERIAL FINANCIAL INTEREST

If an agency cross transaction arises, WQL will only execute such transaction with the consent of the applicable client. An agency cross transaction is generally defined as a transaction where a person acts as investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

C. TRANSACTIONS IN SECURITIES RECOMMENDED TO CLIENTS

From time to time, representatives of WQL may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of WQL to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. WQL will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client’s disadvantage when similar securities are being bought or sold.

D. TRANSACTIONS IN SECURITIES PURCHASED FOR CLIENTS

From time to time, representatives of WQL may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WQL to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest; however, WQL will never engage in trading that operates to the client’s disadvantage if representatives of WQL buy or sell securities at or around the same time as clients.

Item 12 Brokerage Practices

A. SOFT DOLLARS

In the event that the client requests that WQL recommend a broker-dealer/custodian for execution and/or custodial services, WQL generally recommends that investment advisory accounts be maintained at Fidelity, Charles Schwab, Nationwide, or Interactive Brokers. Prior to engaging WQL to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with WQL setting forth the terms and conditions under which WQL shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that WQL considers in recommending Fidelity, Charles Schwab, Nationwide, Interactive Brokers, (or any other broker- dealer/custodian to clients) include historical relationship with WQL, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by WQL's clients shall comply with WQL's duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to affect the same transaction where WQL determines, in good faith, that the commission/transaction fee is reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker- dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although WQL will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, WQL's investment advisory fee.

NON-SOFT DOLLAR RESEARCH AND ADDITIONAL BENEFITS

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, WQL receives from certain broker- dealers/custodians without cost (and/or at a discount) support services and/or products, certain of which assist WQL to better monitor and service client accounts maintained at such institutions. Included within the support services that are obtained by WQL are investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by WQL in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that are received assist WQL in managing and administering client accounts. Others do not directly provide such assistance, but rather assist WQL to manage and further develop its business enterprise.

WQL's clients do not pay more for investment transactions effected and/or assets maintained at Interactive Brokers, Fidelity, or Charles Schwab, as a result of this arrangement. There is no corresponding commitment made by WQL to Interactive Brokers, Fidelity, Charles Schwab, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as result of the above arrangement.

In 2018, WQL began recommending Fidelity serve as a qualified custodian for client accounts. As a result of this relationship, new clients may elect to engage Fidelity to serve as their qualified custodian and, similarly, existing clients may elect to transition their assets from their current custodian to Fidelity. As part of this process, Fidelity provided a total of $8,000 in transition assistance funding in order to defray costs associated with existing clients changing custodians. Since the costs of changing custodians amounted to less than $8,000, the remaining balance was applied pro rata to defray future costs for WQL clients who transition to Fidelity as part of this process. It was previously reported that we had received soft dollars from Fidelity in 2019 and in 2020 which was in error.

WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding perceived conflict of interest such arrangements create.

BROKERAGE FOR CLIENT REFERRALS

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

DIRECTED BROKERAGE

WQL recommends that its clients utilize the brokerage and custodial services provided by Fidelity, Charles Schwab, Interactive Brokers, Nationwide. WQL generally does not accept directed brokerage arrangements (when a client requires that account

transactions be affected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and WQL will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by WQL As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs WQL to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through WQL. Higher transaction costs adversely impact account performance. Please Also Note: Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

B. BLOCK TRADING

Transactions for each client account generally will be affected independently, unless WQL decides to purchase or sell the same securities for several clients at approximately the same time. WQL may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among WQL's client's differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. WQL shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

A. PERIODIC REVIEWS

For those clients to whom WQL provides investment supervisory services, account reviews are conducted on an ongoing basis by a WQL investment professional. All investment supervisory clients are advised that it remains their responsibility to advise WQL of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with WQL on an annual basis.

B. CLIENT ACCOUNT REVIEWS

WQL may conduct account reviews on other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.

C. REPORTS

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. WQL may also provide a written periodic report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

A. ECONOMIC BENEFITS FOR PROVIDING ADVISORY SERVICES

As referenced in Item 12 above, WQL receives from Fidelity, Charles Schwab, Interactive Brokers, Nationwide, without cost (and/or at a discount), support services and/or products. WQL's clients do not pay more for investment transactions effected and/or assets maintained at Fidelity, Charles Schwab, Interactive Brokers, or Nationwide as result of this arrangement. There is no corresponding commitment made by WQL to Fidelity, Charles Schwab, Interactive Brokers, or Nationwide, or any other entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangements. WQL's Chief Compliance Officer, Thomas J. Clancy, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding conflict of interest such arrangements create.

As referenced in Item 4 above, certain of WQL's representatives serve as representatives of PKS. and as licensed insurance agents of Jalinski Insurance, WQL's affiliated insurance agency. When acting in this capacity, WQL's representatives are eligible to receive health insurance, a deferred compensation plan, sales incentives and award trips if certain sales thresholds are met. To mitigate this conflict of interest, this disclosure is provided. Clients are under no obligation to engage the services of any such recommended professional. Clients are free to accept or reject any recommendation from WQL and/or its representatives.

WQL may receive compensation from the selected third-party advisers via a fee split, but otherwise does not receive any economic benefit from any other third party for advice rendered to WQL's clients.

Please Also Note: Additional Assistance: WQL can also receive (or qualify to receive based upon sales volume) marketing-related assistance and/or advances from third parties (including insurance companies) relative to prospective insurance sales, thereby presenting a potential additional conflict of interest.

B. COMPENSATION FOR CLIENT REFERRALS

WQL does not compensate unaffiliated individuals or entities for prospective client introductions.

WQL recommends its ERISA Retirement Plan clients utilize Preferred Pension Planning Corporation ("PPPC") to act as the qualified retirement plan administrator ("Administrator"). PPPC is also the Administrator of WQL's own company retirement plan. Since WQL refers clients to PPPC, PPPC does not charge a fee to WQL to act as the Administrator to WQL's own company retirement plan. This creates a conflict of interest for WQL to recommend clients utilize PPPC based on the economic benefit PPPC provides to WQL. WQL attempts to mitigate this conflict of interest by evaluating PPPC's services and recommending clients utilize PPPC based on the value PPPC provides in itself.

Item 15 Custody

WQL shall have the ability to deduct its advisory fee from the client's account(s) maintained at the account custodian. At least quarterly, clients are provided with regular written summary account statements directly from the broker-dealer/custodian for the client's accounts. WQL may also provide a written periodic report summarizing account activity and performance.

To the extent that WQL provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by WQL with the account statements received from the account custodian. Please Also Note: The account custodian does not verify the accuracy of WQL's advisory fee calculation.

Item 16 Investment Discretion

The client can determine to engage WQL to provide investment advisory services on a discretionary basis. Prior to WQL assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming WQL as the client's attorney and agent in fact, granting WQL full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

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

Item 17 Voting Client Securities

WQL does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients will receive their proxies or other solicitations directly from their custodian.

Item 18 Financial Information

A. PREPAYMENT

WQL does not solicit fees of more than $1,200 per client, six (6) months or more in advance.

B. FINANCIAL CONDITIONS

WQL is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

C. BANKRUPTCY

WQL has not been the subject of a bankruptcy petition.