

Kiker Wealth Management, LLC (“KWM”)

Our firm is registered with the US Securities and Exchange Commission (the “SEC”) as an Investment Adviser.

You have a choice among different types of financial services professionals to assist you with your financial needs. These professionals offer a variety of services and fee arrangements. It is important for you to understand the differences between the services offered, such as the difference between brokerage and investment advisory services, so that you can make an informed decision. This Summary is designed to help you understand the types of financial services our firm can provide you, and the fees we charge for those services. The SEC also provides free and simple tools that allow you to research firms and financial professionals at www.investor.gov/CRS. This site also provides educational materials about broker-dealers, investment advisers and investing.

What Investment Services and Advice Can You Provide Me?

At KWM, we provide investment advisory services to retail investors. We offer both limited and comprehensive financial planning, depending upon your specific needs. We offer periodic updates to your financial plan, with interim updates available if your financial circumstances change. We also offer portfolio management services, so that we can implement the investment plan that we develop together with you by investing your assets according to the plan. We do not have a stated minimum portfolio size requirement, but our investment strategies may not be suitable for small portfolios. As part of our standard services for portfolio management clients, we monitor all of our investment models on an ongoing basis. All client portfolios are continually monitored using our rebalancing software, which allows us to quickly manage any kind of drift experienced by the portfolio. Our desire is to meet with each client at least annually either in person or by phone to discuss the goals and objectives of the portfolio. We will also conduct interim reviews and updates any time life changes or market conditions call for it. We like to talk to our clients regularly to check in and make sure we are still on track. We also offer general consulting services on a project basis.

Our clients engage us for discretionary portfolio management. This means that once we agree on an investment plan for your portfolio, we will actively manage your account(s) without contacting you to discuss each investment decision. You may impose certain written restrictions on us in the management of your investment portfolio, such as prohibiting the sale of highly appreciated stocks. You should note, however, that restrictions imposed by you may adversely affect the composition and performance of your investment portfolio. By signing our advisory agreement, you will choose whether to give us discretionary or non-discretionary authority, which will be in effect until either you or we terminate that agreement.

More information is available in our Form ADV Part 2A (our “Brochure”), in Items 4 and 7; please click [here](#) for a link to our Brochure or call our office to have a copy sent to you.

Here are some questions you might want to discuss with us in more detail:

<i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i>
<i>How will you choose investments to recommend to me?</i>
<i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i>

What Fees Will I Pay?

Fees and costs will affect the value of your portfolio over time. Our primary source of compensation is the fees we charge for advisory services. Our financial planning fees are assessed on an hourly basis. We will discuss and agree upon the cost before we start working on your plan. Portfolio management fees are calculated as a percentage of the assets we manage for you and are billed quarterly in advance. This type of fee arrangement provides an incentive for us to encourage you to deposit more assets in your account, which would increase our fees. General consulting fees are agreed to in advance of services being provided and are usually assessed on an hourly or fixed fee basis.

In addition to the fees that we charge, your portfolio will incur other expenses. The most common examples are brokerage transaction fees (such as the fee that the broker charges to buy or sell a security in your account) and mutual fund internal expenses. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce

any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **More information is available in our Form ADV Part 2A (our “Brochure”), in Item 5,** and we are happy to discuss fee arrangements in more detail with you. For example, you might want to ask:

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

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

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

As described in detail in Item 12 of our Form ADV Part 2A, we recommend that you hold your account(s) at Fidelity Brokerage Services, LLC (“Fidelity”) or Charles Schwab & Co., Inc. (“Schwab”). Fidelity and Schwab offer adviser-based programs. We receive benefits from our participation in these programs, which provides an incentive for us to encourage you to keep your account(s) at Fidelity or Schwab.

As a registered investment adviser, we are held to what is known as a fiduciary standard, which covers our entire investment advisory relationship with you. As a fiduciary, we must eliminate any conflicts of interest or tell you about them in a way you can understand, so that you can decide whether to agree to them. More information is available in our Form ADV Part 2A in Items 11, 12 and 14. To continue this conversation, you might want to ask:

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

How do your financial professionals make money?

Our financial professionals are paid a salary and are also eligible to receive bonuses based on the overall profitability of the firm. Financial professionals who are also owners may also receive their share of corporate distributions. The receipt of compensation based on revenue or profits could influence our financial professionals to recommend that you increase the assets that he or she manages for you.

Some of our financial professionals are licensed to sell insurance. Accordingly, they may receive separate and typical compensation based. However, we do not allow such sales to occur in accounts that we manage for you as a registered investment adviser firm. You will never pay a fee to our firm and any type of commission or other transaction fee to one of our professionals on the same account.

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

Yes. There is a free and simple tool available at www.Investor.gov/CRS, which you can access at any time to read about our firm and our financial professionals. You might want to ask:

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

Additional Information

Please refer to our Form ADV (also known as our “Brochure”), as it contains more details on these and other topics. Please call us at (706) 253-7285 or email renee@kikerwealth.com to request our latest Brochure and any updated Summary that may be available. You can also visit our website at www.KikerWealth.com for additional information.

Finally, you might want to ask:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker dealer? Who can I talk to if I have concerns about how this person is treating me?

Brochure

Form ADV Part 2A

Item 1 - Cover Page

KIKER WEALTH MANAGEMENT, LLC

CRD# 154405

Main Office 788 West Church Street Jasper, Georgia 30143 (706) 253-7285	Branch Office 367 Prince Avenue, Suite 3B Athens, Georgia 30606 (706) 253-7285
---	--

www.KikerWealth.com

May 7, 2025

This Brochure provides information about the qualifications and business practices of Kiker Wealth Management, LLC. If you have any questions about the contents of this Brochure, please contact us at (706) 253-7285 or renee@kikerwealth.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state authority.

Kiker Wealth Management, LLC is an investment advisory firm registered with the appropriate regulatory authority. Registration does not imply a certain level of skill or training. Additional information about Kiker Wealth Management, LLC also is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Material Changes

This Brochure is prepared in the revised format required beginning in 2011. Registered Investment Advisers are required to use this format to inform clients of the nature of advisory services provided, types of clients served, fees charged, potential conflicts of interest and other information. The Brochure requirements include providing a Summary of Material Changes (the "Summary") reflecting any material changes to our policies, practices, or conflicts of interest made since our last required "annual update" filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Our last annual update was filed on March 28, 2024. Of course, the complete Brochure is available to you at any time upon request.

Item 3 - Table of Contents

Page

Item 1 - Cover Page	1
Item 2 - Material Changes.....	1
Item 3 - Table of Contents	2
Item 4 - Advisory Business	3
Item 5 - Fees and Compensation	6
Item 6 - Performance-Based Fees and Side-By-Side Management	7
Item 7 - Types of Clients	8
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 - Disciplinary Information	10
Item 10 - Other Financial Industry Activities and Affiliations	10
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading ..	10
Item 12 - Brokerage Practices	11
Item 13 - Review of Accounts	14
Item 14 - Client Referrals and Other Compensation	14
Item 15 - Custody.....	15
Item 16 - Investment Discretion.....	15
Item 17 - Voting Client Securities	15
Item 18 - Financial Information.....	15
Brochure Supplements.....	Exhibit A

Item 4 - Advisory Business

General Information

Kiker Wealth Management, LLC ("KWM") was formed in 2010 and provides financial planning and portfolio management services to our clients.

Paul K. Kiker, Jr. is the sole principal owner of KWM. Please see ***Brochure Supplements, Exhibit A***, for more information on Mr. Kiker and other individuals who formulate investment advice and have direct contact with clients or have discretionary authority over client accounts.

As of December 31, 2024, KWM managed \$268,580,103 on a discretionary basis, and does not manage any assets on a non-discretionary basis. KWM does not participate in or offer any wrap programs.

SERVICES PROVIDED

At the outset of each client relationship, we spend time with you, asking questions, discussing your investment experience and financial circumstances, and broadly identifying your major goals.

You may elect to retain us to prepare a full financial plan. This written report is presented to you for consideration. In most cases, clients subsequently retain us to manage their investment portfolio on an ongoing basis.

For those financial planning clients making this election, and for other clients who do not need financial planning but retain us for portfolio management services, based on all the information initially gathered, we generally develop:

- a financial outline for you based on your financial circumstances and goals, and your risk tolerance level (the "Financial Profile" or "Profile"); and
- your investment objectives and guidelines (the "Investment Plan" or "Plan").

The Financial Profile is a reflection of your current financial picture and a look to your future goals. The Investment Plan outlines the types of investments we will make on your behalf to meet those goals. The Profile and the Plan are discussed regularly with you but are not necessarily written documents.

Financial Planning

One of the services offered by us is financial planning, described below. This service may be provided as a stand-alone service or may be coupled with ongoing portfolio management.

Financial planning generally includes advice that addresses one or more areas of a client's financial situation, such as estate planning, risk management, budgeting and cash flow controls, retirement planning, education funding, and investment portfolio design and ongoing management. Depending on your particular situation, financial planning may include some or all of the following:

- Gathering factual information concerning your personal and financial situation;
- Assisting you in establishing financial goals and objectives;
- Analyzing your present situation and anticipated future activities in light of your financial goals and objectives;

- Identifying problems foreseen in the accomplishment of these financial goals and objectives and offering alternative solutions to the problems;
- Making recommendations to help achieve retirement plan goals and objectives;
- Designing an investment portfolio to help meet your goals and objectives;
- Providing estate planning;
- Assessing risk and reviewing basic health, life and disability insurance needs; or
- Reviewing goals and objectives and measuring progress toward these goals.

Once financial planning advice is given, you may choose to have us implement your financial plan and manage your investment portfolio on an ongoing basis. However, you are under no obligation to act upon any of the recommendations made by us under a Financial Planning engagement and/or engage the services of any recommended professional.

Portfolio Management

As described above, at the beginning of a client relationship, we meet with you, gather information and perform research and analysis as necessary to develop your Investment Plan. The Investment Plan will be updated from time to time when requested by you, or when determined to be necessary or advisable by us based on updates to your financial or other circumstances.

To implement your Investment Plan, we will manage your investment portfolio on a discretionary basis. As a discretionary investment adviser, we will have the authority to supervise and direct your portfolio without prior consultation with you.

Notwithstanding the foregoing, you may impose certain written restrictions on us in the management of your investment portfolio, such as prohibiting the inclusion of certain types of investments in an investment portfolio or prohibiting the sale of certain investments held in the account at the commencement of the relationship. You should note, however, that restrictions imposed by you may adversely affect the composition and performance of your investment portfolio. You should also note that your investment portfolio is treated individually by giving consideration to each purchase or sale for your account. For these and other reasons, performance of your investment portfolio within the same investment objectives, goals and/or risk tolerance may differ and you should not expect that the composition or performance of your investment portfolio would necessarily be consistent with similar clients of ours.

Individual Retirement Advice

When we are making investment recommendations to you regarding your retirement plan account or individual retirement account, we are acting as fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money or otherwise are compensated creates some conflicts with your financial interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice) to you;
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;

- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than what is reasonable for our services; and
- Give you basic information about our conflicts of interest.

Retirement Plan Advisory Services

Establishing a sound fiduciary governance process is vital to good decision-making and to ensuring that prudent procedural steps are followed in making investment decisions. We will provide Retirement Plan consulting services to Plans and Plan Fiduciaries as described below. The particular services provided will be detailed in the consulting agreement. The appropriate Plan Fiduciary(ies) designated in the Plan documents (e.g., the Plan sponsor or named fiduciary) will (i) make the decision to retain our firm; (ii) agree to the scope of the services that we will provide; and (iii) make the ultimate decision as to accepting any of the recommendations that we may provide. The Plan Fiduciaries are free to seek independent advice about the appropriateness of any recommended services for the Plan. Retirement Plan consulting services may be offered individually or as part of a comprehensive suite of services.

The Employee Retirement Income Security Act of 1974 (“ERISA”) sets forth rules under which Plan Fiduciaries may retain investment advisers for various types of services with respect to Plan assets. For certain services, KWM will be considered a fiduciary under ERISA. For example, we will act as an ERISA § 3(21) fiduciary when providing non-discretionary investment advice to the Plan Fiduciaries by recommending a suite of investments as choices among which Plan Participants may select. Also, to the extent that the Plan Fiduciaries retain us to act as an investment manager within the meaning of ERISA § 3(38), we will provide discretionary investment management services to the Plan.

Fiduciary Consulting Services

- *Investment Selection Services*
We will provide Plan Fiduciaries with recommendations of investment options consistent with ERISA section 404(c). Plan Fiduciaries retain responsibility for the final determination of investment options and for compliance with ERISA section 404(c).
- *Non-Discretionary Investment Advice*
We provide Plan Fiduciaries and Plan Participants general, non-discretionary investment advice regarding asset classes and investments.

Fiduciary Management Services

- *Discretionary Investment Selection Services*
We will monitor the investment options of the Plan and add or remove investment options for the Plan without prior consultation with the Plan Fiduciaries. We will have discretionary authority to make and implement all decisions regarding the investment options that are available to Plan Participants.

Non-Fiduciary Services

- *Participant Education*

We will provide education services to Plan Participants about general investment principles and the investment alternatives available under the Plan. Education presentations will not take into account the individual circumstances of each Plan Participant and individual recommendations will not be provided unless a Plan Participant separately engages us for such services. Plan Participants are responsible for implementing transactions in their own accounts.

- *Participant Enrollment*

We will assist with group enrollment meetings designed to increase retirement Plan participation among employees and investment and financial understanding by the employees.

General Consulting

In addition to the foregoing services, we may provide general consulting services to clients. These services are generally provided on a project basis, and usually include, without limitation, cost basis research, limited estate planning, budget planning, review of a client's non-managed accounts such as 401(k)s as well as other matters specific to the client as and when requested by the client and agreed to by KWM. The scope and fees for consulting services will be negotiated with each client at the time of engagement for the applicable project.

Item 5 - Fees and Compensation

General Fee Information

Fees paid to us are exclusive of all custodial and transaction costs paid to your custodian, brokers or other third-party consultants. Please see ***Item 12 - Brokerage Practices*** for additional information. Fees paid to us are also separate and distinct from the fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). You should review all fees charged by funds, brokers, KWM and others to fully understand the total amount of fees paid by you for investment and financial-related services.

Financial Planning

As noted above, fees for services outside of portfolio management are negotiated separately at the time of the engagement. We may charge separately for financial planning at no more than \$500 per hour.

Portfolio Management Fees

The annual fee schedule, based on a percentage of assets under management, is determined individually for each client. The maximum fee assessed is 2% per year.

We may impose a minimum portfolio value and/or a minimum annual fee. We may, at our discretion, make exceptions to the foregoing or negotiate special fee arrangements where we deem it appropriate under the circumstances.

Portfolio management fees are payable quarterly in advance. If management begins after the start of a quarter, fees will be prorated accordingly. With your authorization and unless other arrangements are made, fees are normally debited directly from your account(s).

Either you or KWM may terminate your Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to you based on the number of days that the account was managed, and any fees due to us from you will be invoiced or deducted from your account prior to termination.

General Consulting Fees

When we provide general consulting services to clients, these services are generally separate from our financial planning and portfolio management services. Fees for general consulting are negotiated at the time of the engagement for such services and are normally based on an hourly or fixed fee basis. Consulting fees generally range from \$150 to \$300 per/hour depending on the personnel involved and the scope of the work.

Other Compensation

As described below, to serve a variety of needs expressed by our clients, we are able to facilitate some transactions beyond the scope of customary money management. We have a conflict of interest in these transactions because of the financial incentive we have in recommending these products and services. We believe the conflict is mitigated by the additional services, products or other benefits clients receive and through the asset limits in our portfolio allocation and review process.

- (1) Insurance sales. Certain individuals are licensed to sell insurance and are entitled to receive commissions or other remuneration on the sale of insurance products. As such, these individuals can effect insurance transactions and will receive separate, yet customary compensation. To protect your interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to these individuals and a management fee to us on the same pool of assets.
- (2) Referral Fees. We sometimes refer clients to third parties we have researched who provide precious metals trading and custodial storage services (e.g., GoldCore). We make these referrals when we deem it appropriate for a client or when a client makes a request for this kind of service. These custodians pay us a referral fee and the client may receive a slight discount on the storage or other fees. We provide disclosure of any referral fee and discounts when the client approves a particular transaction. We do not charge investment management fees on assets stored by third party custodians such as GoldCore.
- (3) We sometimes allocate a portion of client portfolios to precious metals within the portfolios we manage at our securities custodians, in which case such assets will be included when we calculate our investment management fee. If clients decide they want to purchase precious metals and take responsibility for custody of these assets (e.g., storing at home or a safe deposit box rather than using a custodian that we have researched and recommended), we will not charge an investment management fee on those assets.

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

We do not have any performance-based fee arrangements. "Side-by-Side Management" refers to a situation in which the same firm manages accounts that are billed based on a percentage of assets under management and at the same time manages other accounts for which fees are assessed on a performance fee basis. Because we have no performance-based fee accounts, we have no side-by-side management.

Item 7 - Types of Clients

We serve individuals, trusts, estates and charitable organizations. We may impose a minimum portfolio value and/or a minimum annual fee for conventional investment advisory services. Under certain circumstances and in our sole discretion, we may negotiate such minimums.

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

Methods of Analysis

In accordance with your Investment Plan, we will primarily invest in mutual funds, ETFs, and some common stock.

Mutual funds and ETFs are generally evaluated and selected based on a variety of factors, including, without limitation, past performance, fee structure, portfolio manager, fund sponsor, overall ratings for safety and returns, and other factors.

In making selections of individual stocks for your portfolio, we generally focus on technical analysis, which involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.

Investment Strategies

Our strategic approach is to invest your portfolio in accordance with the Plan that has been developed specifically for you. This means that the following strategies may be used in varying combinations over time for you, depending upon your individual circumstances.

Long Term Purchases – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Short Term Purchases – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations.

Short Sales – a securities transaction in which an investor sells securities he or she borrowed in anticipation of a price decline. The investor is then required to return an equal number of shares at some point in the future. A short seller will profit if the stock goes down in price.

Options Trading/Writing – a securities transaction that involves buying or selling (writing) an option. If you write an option, and the buyer exercises the option, you are obligated to purchase or deliver a specified number of shares at a specified price at the exercise of the option regardless of the market value of the security at expiration of the option. Buying an option gives you the right to purchase or sell a specified number of shares at a specified price until the date of expiration of the option regardless of the market value of the security at expiration of the option.

Risk of Loss

While we seek to diversify your investment portfolio across various asset classes consistent with your Investment Plan in an effort to reduce risk of loss, all investment portfolios are subject to risks. Accordingly, there can be no assurance that your investment portfolio will be able to fully meet your investment objectives and goals, or that investments will not lose money.

Below is a description of several of the principal risks that your investment portfolio faces.

Management Risks. While we manage your investment portfolio based on our experience, research and proprietary methods, the value of your investment portfolio will change daily based on the performance of the underlying securities in which they are invested. Accordingly, your investment portfolio is subject to the risk that we allocate your assets to individual securities and/or asset classes that are adversely affected by unanticipated market movements, and the risk that our specific investment choices could underperform their relevant indexes.

Risks of Investments in Mutual Funds, ETFs and Other Investment Pools. As described above, we will invest your portfolios in mutual funds, ETFs and other investment pools ("pooled investment funds"). Investments in pooled investment funds are generally less risky than investing in individual securities because of their diversified portfolios; however, these investments are still subject to risks associated with the markets in which they invest. In addition, pooled investment funds' success will be related to the skills of their particular managers and their performance in managing their funds. Pooled investment funds are also subject to risks due to regulatory restrictions applicable to registered investment companies under the Investment Company Act of 1940.

Equity Market Risks. We may invest portions of your assets directly into equity investments, primarily stocks, or into pooled investment funds that invest in the stock market. As noted above, while pooled investments have diversified portfolios that may make them less risky than investments in individual securities, funds that invest in stocks and other equity securities are nevertheless subject to the risks of the stock market. These risks include, without limitation, the risks that stock values will decline due to daily fluctuations in the markets, and that stock values will decline over longer periods (i.e., bear markets) due to general market declines in the stock prices for all companies, regardless of any individual security's prospects.

Fixed Income Risks. We may invest portions of your assets directly into fixed income instruments, such as bonds and notes, or may invest in pooled investment funds that invest in bonds and notes. While investing in fixed income instruments, either directly or through pooled investment funds, is generally less volatile than investing in stock (equity) markets, fixed income investments nevertheless are subject to risks. These risks include, without limitation, interest rate risks (risks that changes in interest rates will devalue the investments), credit risks (risks of default by borrowers), or maturity risk (risks that bonds or notes will change value from the time of issuance to maturity).

Foreign Securities Risks. We may invest portions of your assets into pooled investment funds that invest internationally. While foreign investments are important to the diversification of your investment portfolio, they carry risks that may be different from U.S. investments. For example, foreign investments may not be subject to uniform audit, financial reporting or disclosure standards, practices or requirements comparable to those found in the U.S. Foreign investments are also subject to foreign withholding taxes and the risk of adverse changes in investment or exchange control regulations. Finally, foreign investments may involve currency risk, which is the risk that the value of the foreign security will decrease due to changes in the relative value of the U.S. dollar and the security's underlying foreign currency.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of KWM or the integrity of our management. We have no disciplinary events to report.

Item 10 - Other Financial Industry Activities and Affiliations

Certain individuals of ours are also licensed insurance agents and will earn separate and additional compensation when effecting insurance transactions. Please see ***Item 5 - Fees and Compensation*** for more information.

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

Code of Ethics and Personal Trading

We have adopted a Code of Ethics ("the Code"), the full text of which is available to you upon request. Our Code has several goals. First, the Code is designed to assist us in complying with applicable laws and regulations governing our investment advisory business. Under the Investment Advisers Act of 1940, we owe fiduciary duties to our clients. Pursuant to these fiduciary duties, our Code requires persons associated with us (managers, officers and employees) to act with honesty, good faith and fair dealing in working with clients. In addition, the Code prohibits such associated persons from trading or otherwise acting on insider information.

Next, the Code sets forth guidelines for professional standards for our associated persons. Under the Code's Professional Standards, we expect our associated persons to put the interests of our clients first, ahead of personal interests. In this regard, our associated persons are not to take inappropriate advantage of their positions in relation to our clients.

Third, the Code sets forth policies and procedures to monitor and review the personal trading activities of associated persons. From time to time, our associated persons may invest in the same securities recommended to clients. Under our Code, we have adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. The Code also provides for disciplinary action as appropriate for violations.

Participation or Interest in Client Transactions

Because associated persons may invest in the same securities as those held in your accounts, we have established a policy requiring our associated persons to pre-clear transactions in some types of securities with the Chief Compliance Officer. The goal of this policy is to avoid any conflict of interest that arise in these situations. Some types of securities, such as CDs, treasury obligations and open-end mutual funds are exempt from this pre-clearance requirement. However, in the event of other identified potential trading conflicts of interest, our goal is to place your interests first.

Consistent with the foregoing, we maintain policies regarding participation in initial public offerings ("IPOs") and private placements in order to comply with applicable laws and avoid conflicts with client transactions. If our associated person wishes to participate in an IPO or invest

in a private placement, he or she must submit a pre-clearance request and obtain the approval of the Chief Compliance Officer.

Item 12 - Brokerage Practices

Best Execution and Benefits of Brokerage Selection

When given discretion to select the brokerage firm that will execute orders in your accounts, we seek “best execution” for your trades, which is a combination of a number of factors, including, without limitation, quality of execution, services provided and commission rates. Therefore, we may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third-party research (or any combination), and may be used in servicing any or all of our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

We participate in the Fidelity adviser-based program offered by Fidelity Brokerage Services, LLC (“Fidelity”). While there is no direct link between the investment advice we provide and participation in the Fidelity program, we receive certain economic benefits from the program. These benefits may include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of our fees from our clients’ accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of our accounts, including accounts not held at Fidelity. These services are not soft dollar arrangements, but are part of the institutional platform offered by Fidelity. Fidelity may also make available to us other services intended to help us manage and further develop our business. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance and marketing. In addition, Fidelity may make available, arrange and/or pay for these types of services to be rendered to us by independent third parties. Fidelity may discount or waive fees it would otherwise charge for some of these services, pay all or a part of the fees of a third-party providing these services to us, and/or Fidelity may pay for travel expenses relating to participation in such training. Finally, participation in the Fidelity program provides us with access to mutual funds which normally require significantly higher minimum initial investments or are normally available only to institutional investors.

The benefits received through participation in the Fidelity program do not necessarily depend upon the proportion of transactions directed to Fidelity. The benefits are received by us, in part because of commission revenue generated for Fidelity by our clients. This means that the investment activity in client accounts is beneficial to us, because Fidelity does not assess a fee to us for these services. This creates an incentive for us to continue to recommend Fidelity to our clients. While it may be possible to obtain similar custodial, execution and other services elsewhere at a lower cost, we believe that Fidelity provides an excellent combination of these services.

For our clients’ accounts that Fidelity maintains, Fidelity generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Fidelity account. Certain trades may not incur Fidelity commissions or transaction fees. Fidelity is also compensated by earning interest on the uninvested cash in your account.

KWM recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, as the qualified custodian to maintain custody of clients' assets. KWM will also effect trades for client accounts at Schwab, or may in some instances, consistent with KWM's duty of best execution and specific agreement with each client, elect to execute trades elsewhere. Although KWM may recommend that clients establish accounts at Schwab, it is ultimately the client's decision to custody assets with Schwab. KWM is independently owned and operated and is not affiliated with Schwab.

Schwab Advisor Services provides KWM with access to its institutional trading, custody, reporting and related services, which are typically not available to Schwab retail investors. Schwab also makes available various support services. Some of those services help KWM manage or administer our clients' accounts while others help KWM manage and grow our business. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not soft dollar arrangements, but are part of the institutional platform offered by Schwab. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For KWM client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts. Schwab is also compensated by earning interest on the uninvested cash in your account. Schwab Advisor Services also makes available to KWM other products and services that benefit KWM but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of KWM accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist KWM in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide pricing and other market data; (iv) facilitate payment of KWM's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab Advisor Services also offers other services intended to help KWM manage and further develop its business enterprise. These services may include: (i) technology compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to KWM. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to KWM. Schwab Advisor Services may also provide other benefits such as educational events or occasional business entertainment of KWM personnel. In evaluating whether to recommend that clients custody their assets at Schwab, KWM may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Additionally, from time to time mutual fund companies or other vendors may sponsor all or part of client events for us. Sponsorship is not based on any type of agreement for us to invest or retain a set amount of client funds in particular securities.

Directed Brokerage

You may direct us to use a particular broker for custodial or transaction services on behalf of your portfolio. In directed brokerage arrangements, you are responsible for negotiating the commission rates and other fees to be paid to the broker. Accordingly, if you choose to direct brokerage you should consider whether such designation may result in certain costs or disadvantages to you, either because you may pay higher commissions or obtain less favorable execution, or the designation limits the investment options available to you.

The arrangement that we have with Fidelity Investments is designed to maximize efficiency and to be cost effective. By directing brokerage arrangements, you acknowledge that these economies of scale and levels of efficiency are generally compromised when alternative brokers are used. While every effort is made to treat clients fairly over time, the fact that a client chooses to use the brokerage and/or custodial services of these alternative service providers can in fact result in a certain degree of delay in executing trades for their account(s) and otherwise adversely affect management of their account(s).

By directing us to use a specific broker or dealer, clients who are subject to ERISA confirm and agree with us that they have the authority to make the direction, that there are no provisions in any client or plan document which are inconsistent with the direction, that the brokerage and other goods and services provided by the broker or dealer through the brokerage transactions are provided solely to and for the benefit of the client's plan, plan participants and their beneficiaries, that the amount paid for the brokerage and other services have been determined by the client and the plan to be reasonable, that any expenses paid by the broker on behalf of the plan are expenses that the plan would otherwise be obligated to pay, and that the specific broker or dealer is not a party in interest of the client or the plan as defined under applicable ERISA regulations.

Aggregated Trade Policy

We may enter trades as a block where possible and when advantageous to clients whose accounts have a need to buy or sell shares of the same security. This method permits the trading of aggregate blocks of securities composed of assets from multiple client accounts. It allows us to execute trades in a timely, equitable manner, and may reduce overall costs to clients.

We will only aggregate transactions when we believe that aggregation is consistent with our duty to seek best execution (which includes the duty to seek best price) for our clients, and is consistent with the terms of our Investment Advisory Agreement with each client for which trades are being aggregated. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all KWM's transactions in a given security on a given business day. Transaction costs for participating accounts will be assessed at the custodian's commission rate applicable to each account; therefore, transaction costs may vary among accounts. Accounts may be excluded from a block due to tax considerations, client direction or other factors making the account's participation ineligible or impractical.

We will prepare, before entering an aggregated order, a written statement ("Allocation Statement") specifying the participating client accounts and how we intend to allocate the order among those clients. If the aggregated order is filled in its entirety, it will be allocated among clients in

accordance with the Allocation Statement. If the order is partially filled, it will generally be allocated pro-rata, based on the Allocation Statement, or randomly in certain circumstances. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment, and the reason for different allocation is explained in writing and is approved by an appropriate individual/officer of KWM. Our books and records will separately reflect, for each client account included in a block trade, the securities held by and bought and sold for that account. Funds and securities of clients whose orders are aggregated will be deposited with one or more banks or broker-dealers, and neither the clients' cash nor their securities will be held collectively any longer than is necessary to settle the transaction on a delivery versus payment basis; cash or securities held collectively for clients will be delivered out to the custodian bank or broker-dealer as soon as practicable following the settlement, and we will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation.

Item 13 - Review of Accounts

We are always available to discuss your portfolio with you, and we like to meet with each client by phone or in person at least annually. All managed portfolios are monitored on an ongoing basis using our rebalancing software. If a portfolio experiences "drift" from the planned allocation (outside of preset tolerance bands), your Financial Advisor will review further and make any necessary adjustments. We may also review your portfolio more often if requested by you, upon receipt of information material to the management of your portfolio, or at any time such review is deemed necessary or advisable by us. These factors generally include but are not limited to the following: change in your general circumstances (marriage, divorce, retirement); or economic, political or market conditions. We also review our total portfolio of recommended securities on a continual basis. Paul K. Kiker, Jr., KWM's Managing Member, and John Alexander, a Financial Advisor, both review accounts.

Account custodians are responsible for providing monthly or quarterly account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. Account custodians also provide prompt confirmation of all trading activity, and year-end tax statements, such as 1099 forms. We will provide additional written reports as needed or requested by you.

Item 14 - Client Referrals and Other Compensation

As noted above, we receive economic benefits from Fidelity and Schwab in the form of support products and services they make available to us and other independent investment advisors that have their clients maintain accounts at Fidelity or Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described in ***Item 12 - Brokerage Practices***. The availability of Fidelity's and Schwab's products and services to us is based solely on our participation in their programs and not on the provision of any particular investment advice.

KWM has entered an arrangement with a third party (a "Promoter") to identify and refer potential clients to KWM. Consistent with legal requirements under the Investment Advisers Act of 1940, as amended, KWM has a written agreement with the Promoter under which, among other things, the Promoter is required to disclose the compensation arrangements to prospective clients before such clients enter into an agreement with KWM. In addition, the Promotor provides all referred clients that ultimately engage KWM for service with a free subscription to the Promoter's website.

Item 15 - Custody

Fidelity and Schwab are the custodians of nearly all client accounts at KWM. From time to time, however, clients may select an alternate broker to hold accounts in custody. In any case, it is the custodian's responsibility to provide you with confirmations of trading activity, tax forms and at least quarterly account statements. You are advised to review this information carefully, and to notify us of any questions or concerns. You are also asked to promptly notify us if the custodian fails to provide statements on each account held.

From time to time and in accordance with our agreement with you, we will provide additional reports. The account balances reflected on these reports should be compared to the balances shown on the brokerage statements to ensure accuracy. At times, there may be small differences due to the timing of dividend reporting, pending trades and other such issues.

Item 16 - Investment Discretion

As described in ***Item 4 - Advisory Business***, we will accept clients on a discretionary basis. For *discretionary accounts*, a Limited Power of Attorney ("LPOA") is executed by you, giving us the authority to carry out various activities in your account, generally including the following: trade execution; the ability to request checks on your behalf; and, the withdrawal of advisory fees directly from your account. We then direct investment of your portfolio using our discretionary authority. We may limit the terms of the LPOA to the extent consistent with your investment advisory agreement with us and the requirements of your custodian.

Item 17 - Voting Client Securities

As a policy and in accordance with our agreement, we do not vote proxies related to securities held in your account.

Item 18 - Financial Information

We do not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Exhibit A

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Paul Kiker, Jr.

CRD# 4066487

of

Kiker Wealth Management, LLC

788 West Church Street
Jasper, Georgia 30143

(706) 253-7285

www.KikerWealth.com

July 21, 2025

This Brochure Supplement provides information about Paul Kiker, and supplements the Kiker Wealth Management, LLC ("KWM") Brochure. You should have received a copy of that Brochure. Please contact us at (706) 253-7285 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Paul is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

Paul Kiker, Jr. (year of birth 1974) is a Managing Member and President of KWM. Paul currently resides in Ellijay, Georgia. He earned his Bachelor of Business Administration from Georgia College and State University in 1997.

Paul's investment career began with Northwestern Mutual life in 1998 while he was living in Middle Georgia with his wife Hollie. In 1999, their oldest child, Kell, was born, and soon thereafter they decided to relocate to Paul's hometown of Ellijay. They now have three children Kell, Katie, and Will.

In the summer of 2000, Paul joined Edward Jones Investments and began building the branch in Jasper, Georgia. In January of 2004, Paul left Edward Jones to gain the freedom he so carefully protects and formed Kiker Investment Services, which became Kiker Wealth Management in 2010.

Paul has a passion for this business and his clients. His central focus is helping his clients navigate the financial markets and his favorite quote is “if I can help those I serve find the right path, then everything else will take care of itself.”

When not in the office, Paul enjoys anything that includes his family and it is a bonus if it also involves being outside. Paul and his wife, Hollie, met on their college water ski team. During that time, Paul became the World and National Collegiate Slalom Champion. He also won the Men’s 1 National Slalom title in 1996. Paul still holds the Georgia state slalom record that he set back in 1996.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Paul has no such disciplinary information to report.

Item 4 - Other Business Activities

Paul is licensed to sell insurance and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, Paul will be able to effect insurance transactions and will receive separate, yet customary compensation. To protect client interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to Paul and a management fee to us on the same pool of assets.

Item 5 - Additional Compensation

Other than stated above, Paul is not engaged in any other investment-related business or occupation, and does not earn compensation for the sale of any other products or services.

Item 6 - Supervision

As the sole owner of Kiker Wealth Management, LLC, Paul supervises all duties and activities of the firm, and is responsible for all advice provided to clients. His contact information is on the cover page of this disclosure document.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Michael Dillon Smith, CFP®

CRD# 6677313

of

Kiker Wealth Management, LLC

788 West Church Street
Jasper, Georgia 30143

(706) 253-7285

www.KikerWealth.com

July 21, 2025

This Brochure Supplement provides information about Dillon Smith, and supplements the Kiker Wealth Management, LLC ("KWM") Brochure. You should have received a copy of that Brochure. Please contact us at (706) 253-7285 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Dillon is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

Michael Dillon Smith (year of birth 1992) joined KWM as a Portfolio Manager in 2016. His responsibilities at KWM include working with individual clients to develop their retirement plan, determining a client's risk profile, communicating with clients regarding their investments and goals, and conducting client reviews. Prior to joining KWM, Dillon worked as a tennis pro assistant at the Bent Tree Community Tennis Center from 2012 to 2016.

Dillon received a Bachelor of Science degree in Mathematics from Dalton State College in 2015. He also completed Kaplan Company's College for Financial Planning CFP® Education Program and is now a CERTIFIED FINANCIAL PLANNER™ professional. Dillon holds Life, Accident and Sickness insurance licenses and has also taken and passed the Series 65, Uniform Investment Adviser Law Exam.

* The CFP® certification is granted by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). To attain the certification, the candidate must complete the required educational,

examination, experience and ethics requirements set forth by CFP Board. Certain designations, such as the CPA, CFA and others may satisfy the education component and allow a candidate to sit for the CFP® Certification Examination. A comprehensive examination tests the candidate's ability to apply financial planning knowledge to client situations. Qualifying work experience is also required for certification. Qualifying experience includes work in the area of the delivery of the personal financial planning process to clients, the direct support or supervision of others in the personal financial planning process, or teaching all, or any portion, of the personal financial planning process. CFP® professionals must complete 30 hours of continuing education accepted by CFP Board every two years.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Dillon has no such disciplinary information to report.

Item 4 - Other Business Activities

Dillon is licensed to sell insurance and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, Dillon will be able to effect insurance transactions and will receive separate, yet customary compensation. To protect client interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to Dillon and a management fee to us on the same pool of assets.

Item 5 - Additional Compensation

Other than as stated above, Dillon is not engaged in any other investment-related business or occupation, and does not earn compensation for the sale of any other products or services.

Item 6 - Supervision

As the sole owner of Kiker Wealth Management, LLC, Paul Kiker supervises all duties and activities of Dillon and is responsible for all advice provided to clients. His contact information is on the cover page of this disclosure document.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

John H. Alexander

CRD# 4751186

367 Prince Avenue, Suite 3B
Athens, Georgia 30606

of

Kiker Wealth Management, LLC

788 West Church Street
Jasper, Georgia 30143

(706) 253-7285

www.KikerWealth.com

July 21, 2025

This Brochure Supplement provides information about John Alexander, and supplements the Kiker Wealth Management, LLC ("KWM") Brochure. You should have received a copy of that Brochure. Please contact us at (706) 253-7285 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

Additional information about John is available on the SEC's website at **www.AdviserInfo.sec.gov**.

Item 2 - Educational Background and Business Experience

John H. Alexander (year of birth 1979) became a Financial Adviser with KWM in September of 2017 and serves as a Financial Advisor. John's investment career began as a Registered Representative with Morgan Keegan & Company, Inc., in 2004, which was later purchased by Raymond James & Associates, Inc. (2013).

John graduated from Georgia Southern University in 2004 with a Bachelor of Science degree in Finance.

Item 3 - Disciplinary Information

On July 10, 2019, John signed a Letter of Acceptance, Waiver and Consent with the Financial Industry Regulatory Authority (FINRA), a self-regulatory organization that regulates broker-dealer firms. Without admitting or denying the findings, and for the purposes of resolving the matter with FINRA, John agreed to accept the entry of FINRA's findings against him for alleged rule violations as well as the imposition of sanctions. John was cited for violating NASD Rule 2510(b) and FINRA Rule 2010 by exercising discretionary trading authority in a client's accounts without having obtained prior written authorization from the client and approval of the accounts as discretionary from the broker-dealer firm with which he was previously associated. John was also cited for violating FINRA Rules 4511(a) and 2010 for not marking the order tickets for those trades as "discretionary" in the broker-dealer's electronic order system, thereby causing the firm to maintain inaccurate books and records. As a result, John agreed to be suspended from association with any FINRA member in any capacity for 60 business days, and assessed a deferred fine of \$7,500. The FINRA suspension runs from July 5, 2019 through October 7, 2019. The FINRA suspension does not suspend John's registration with KWM, and he may continue to work as an investment adviser representative of KWM.

Item 4 - Other Business Activities

John is licensed to sell insurance and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, John will be able to effect insurance transactions and will receive separate, yet customary compensation. To protect client interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to John and a management fee to us on the same pool of assets.

Item 5 - Additional Compensation

Other than as stated above, John is not engaged in any other investment-related business or occupation, and does not earn compensation for the sale of any other products or services.

Item 6 - Supervision

As the sole owner of Kiker Wealth Management, LLC, Paul Kiker supervises all duties and activities of John, and is responsible for all advice provided to clients. His contact information is on the cover page of this disclosure document.

Brochure Supplement

Form ADV Part 2B

Item 1 - Cover Page

Robert ("Alex") A. Snelgrove

CRD# 8043852

of

Kiker Wealth Management, LLC

788 West Church Street
Jasper, Georgia 30143

(706) 253-7285

www.KikerWealth.com

July 21, 2025

This Brochure Supplement provides information about Robert ("Alex") Snelgrove, and supplements the Kiker Wealth Management, LLC ("KWM") Brochure. You should have received a copy of that Brochure. Please contact us at (706) 253-7285 if you did not receive our Brochure, or if you have any questions about the contents of this Supplement.

Additional information about Alex is available on the SEC's website at www.AdviserInfo.sec.gov.

Item 2 - Educational Background and Business Experience

Robert ("Alex") A. Snelgrove (year of birth 2002) joined Kiker Wealth Management in 2025 as a Junior Advisor. Prior to joining the firm, he served as a Financial Representative at Northwestern Mutual. While attending Reinhardt University, he interned at 3a Law Management (2020-2022).

Alex earned a Bachelor of Science in Business Administration from Reinhardt University in 2024.

Item 3 - Disciplinary Information

Advisers are required to disclose any material facts regarding certain legal or disciplinary events that would be material to your evaluation of an adviser; however, Alex has no such disciplinary information to report.

Item 4 - Other Business Activities

Alex is licensed to sell insurance and is entitled to receive commissions or other remuneration on the sale of insurance products. As such, Alex will be able to effect insurance transactions and will receive separate, yet customary compensation. To protect client interests, our policy is to disclose all forms of compensation before any such transaction is executed. Under no circumstance will you pay both a commission to Alex and a management fee to us on the same pool of assets.

Item 5 - Additional Compensation

Other than as stated above, Alex is not engaged in any other investment-related business or occupation and does not earn compensation for the sale of any other products or services.

Item 6 - Supervision

As the sole owner of Kiker Wealth Management, LLC, Paul Kiker supervises all duties and activities of Alex and is responsible for all advice provided to clients. His contact information is on the cover page of this disclosure document.

PRIVACY NOTICE
(Written Information Security Program) of
Kiker Wealth Management, LLC

This is for your information only. No action is required on your part.

At Kiker Wealth Management, LLC, protecting your privacy is very important to us. We want you to understand what information we collect and how we use it. We collect and use “nonpublic private information” in order to provide our clients with a broad range of financial services as effectively and conveniently as possible. We treat nonpublic personal information in accordance with our privacy policy.

“Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing a financial service or product to you.

What Information Do We Collect?

In order to fulfill our obligations to you, we need certain information. Generally, this includes your name, address, social security number, date of birth, account numbers, and information about your income. We may also have access to other sensitive information, such as credit scores, income tax information and so forth.

Where Do We Get This Information?

We may collect nonpublic personal information about you from a variety of sources, such as:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates or others, such as the custodian(s) of your account(s); and
- Information we receive from non-affiliated third parties, including consumer reporting agencies.

What Information Do We Disclose and To Whom Do We Disclose It?

We do not disclose any nonpublic information about you without your express consent, except as permitted by law and as needed to provide the services you have requested. This applies to current as well as former clients. We restrict access to your nonpublic personal information to those who need to know that information in order to provide products or services to you.

Our “affiliates” are companies with which we share common ownership. We do not currently have any affiliated companies.

Our Security Procedures

We maintain physical, electronic and procedural safeguards to protect your nonpublic personal information. This includes measures to protect your information in the course of its disposal.

ANTI-MONEY LAUNDERING POLICIES

Although the specific requirements of Title 3 of the U.S. Patriot Act do not yet technically apply to investment advisers (as advisers are not included in the definition of a “financial institution”), KWM nonetheless takes certain practical measures to prevent money laundering activities.

KWM has designated *Beverly “Renee” Burnett* as the AML Compliance Officer (AMLCO). She is responsible for overseeing the AML program of KWM; to ensure that any required training of employees regarding KWM’s AML procedures is conducted; and to keep the AML policy current at all times.

Many of our clients are referred to us by other professionals with whom we have an ongoing relationship, or by other clients. We review information provided to us by the new clients, as well as information provided to us on behalf of clients by these referring entities. We attempt to identify suspicious or potentially suspicious issues, such as offshore deposits or a desire to effect transactions in cash. Because we are not a broker/dealer, and do not have physical custody of client assets, our actual handling of funds and securities is very restricted. It is limited to processing transfer request forms (which are physically processed by the account custodian) and the receipt of checks, made payable to the appropriate account custodian, which we then immediately pass on to the custodian. We do not handle any client cash, and we do not handle any certificates for any client. In the rare instances in which a client does mail certificates to us, such certificates are normally returned to the client for proper processing. (See our “Custody Policy and Procedure”.)

KWM looks for the following items as red flags:

- Unexplained frequent wire transfers to unknown bank accounts
- Frequent investments followed by frequent redemptions
- Transfers to high risk countries (Any person located in countries identified by the Financial Action Task Force as “Non Cooperative countries and territories” or any person deemed a “Senior political figure” will have heightened diligence.)
- Reluctance to provide identifying information
- Refusal to indicate legitimate source of funds
- Financial activity that does not seem to correlate with investment strategy

KWM checks the names of new clients against the list of Specially Designated Nationals (“SDNs”), which is publicly available at <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>. Any potential new client whose name appears on this list will be reported to the Financial Institution Hotline (866.556.3974). All of this will be documented in the client’s file.

KWM prohibits any client or potential client who:

- Cannot be sufficiently identified
- Appears on the List of Specially Designated Nationals & Blocked Persons maintained by the US Office of Foreign Assets Control (“OFAC”).
- Appears on the control list to be disseminated by the SEC or any other government list of prohibited persons and entities