

Wealth Management of Kentucky, Inc. Firm Brochure - Form ADV Part 2A

444 E Main Street, Suite 112
Lexington, KY, 40507
859-268-4425
www.wmofky.com
bhanks@wmofky.com

Version Date: February 9, 2026

This brochure provides information about the qualifications and business practices of Wealth Management of Kentucky, Inc. If you have any questions about the contents of this brochure, please contact us at 859-268-4425 or by email at: bhanks@wmofky.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 Management of Kentucky, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Wealth Management of Kentucky, Inc.'s CRD number is: 171446.

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

Item 2: Material Changes

The material changes in this brochure from the last updating amendment of Wealth Management of Kentucky, Inc. on November 10, 2025, are described below. Material changes relate to Wealth Management of Kentucky, Inc.'s policies, practices, or conflicts of interests.

No material changes were made.

Item 3: Table of Contents

Item 2: Material Changes.....	2
Item 3: Table of Contents.....	3
Item 4: Advisory Business	4
Item 5: Fees and Compensation.....	6
Item 6: Performance-Based Fees and Side-By-Side Management.....	8
Item 7: Types of Clients	8
Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss.....	8
Item 9: Disciplinary Information	13
Item 10: Other Financial Industry Activities and Affiliations	13
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..	14
Item 12: Brokerage Practices	15
Item 13: Reviews of Accounts	16
Item 14: Client Referrals and Other Compensation.....	17
Item 15: Custody.....	17
Item 16: Investment Discretion.....	18
Item 17: Voting Client Securities (Proxy Voting)	18
Item 18: Financial Information	19
Item 19: Requirements for State Registered Advisers	19

Item 4: Advisory Business

Business Description

We provide services to individuals and high-net-worth individuals concerning fixed income securities, real estate funds, (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors) and treasury inflation protected/inflation linked bonds. As a registered investment adviser, we are held to the highest standard of client care – a fiduciary standard. As a fiduciary, we always put our client’s interests first and must fully disclose any potential conflict of interest. We do not hold customer funds or securities.

A. Description of the Advisory Firm

Wealth Management of Kentucky, Inc. (hereinafter “WMKYL”) is a Corporation organized in the State of Kentucky. The firm was formed in February 2003, and the principal owner is Bruce Wayne Hanks.

B. Types of Advisory Services

Portfolio Management Services

WMKYL offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WMKYL creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

WMKYL evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. WMKYL will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

WMKYL seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of WMKYL’s economic, investment or other financial interests. To meet its fiduciary obligations, WMKYL attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, WMKYL’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client

over another over time. It is WMKYL's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Third Party Money Managers

We will directly invest the assets deposited to your account(s) and/or strategically allocate them to separately managed accounts (each such account an "SMA") to be managed by independent third-party money managers or sub-advisors (each a "TPMM") in line with the asset allocation ranges we have determined for your portfolio. The asset allocation ranges for your portfolio may be modified over time, as your financial circumstances, needs, and investment objectives change. We will communicate these changes to your TPMMs as necessary and modify your portfolio allocations accordingly. The TPMMs we recommend may contract with us directly to provide sub-advisory services to your account, may be accessible to us via the investment platform of your Custodian, or may contract with you independently. In some instances, you may be required to execute a separate written investment advisory agreement and/or discretionary trading authorization in favor of the recommended TPMM(s). You will be provided with the Form ADV Part 2A (or equivalent disclosures) for any recommended TPMMs in advance of their providing services to your account.

We will act as a co-advisor to each of your SMAs, periodically monitoring their performance, evaluating their initial and continuing suitability, and communicating changes in your investment profile to the TPMM, as necessary and appropriate. The TPMM shall be responsible for all trading and investment selection functions under this arrangement. WMKYL, or a third-party engaged by WMKYL, will conduct initial and ongoing due diligence on each recommended TPMM, negotiate fees to be paid by clients and other terms of the engagement, and will provide you with consolidated performance reporting of all of your SMAs.

Financial Planning

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

Services Limited to Specific Types of Investments

WMKYL generally limits its investment advice to fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors) and treasury inflation protected/inflation linked bonds. WMKYL does not invest significantly in ETFs. WMKYL may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

WMKYL offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance

levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent WMKYL from properly servicing the client account, or if the restrictions would require WMKYL to deviate from its standard suite of services, WMKYL reserves the right to end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. WMKYL does not participate in any wrap fee programs.

E. Assets Under Management

WMKYL has the following assets under management:

Discretionary Amounts:	\$42,860,391
Non-discretionary Amounts:	\$0.00
Date Calculated:	December 2025

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

<u>Total Assets Under Management</u>	<u>Annual Fee</u>
All assets	2.0%

These fees are generally negotiable, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of WMKYL's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 30 days' written notice.

WMKYL uses month end value, for purposes of determining the market value of the assets upon which the advisory fee is based.

Sub-Advisory Fees

The specific Sub-Advisory Fees charged by each TPMM will be set forth in their Form ADV Part 2A (or disclosure brochure containing the equivalent information) and/or other account opening documents.

In some instances, WMKY may collect the Sub-Advisory Fees on behalf of the TPMM and remit payment accordingly. Sub-Advisory Fees are separate and distinct from WKMY's advisory fees. While WMKY fees are separate and distinct from TPMM fees, the client will never pay over 2% for the combined services.

Financial Planning Fees

Clients may terminate the agreement without penalty for a full refund of WMKYL's fees within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

Hourly Fees

The negotiated hourly fee for these services is \$125. Fees are charged in arrears upon completion.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears and calculated based on the last day of the previous billing period.

Payment of Financial Planning Fees

Financial planning fees are paid via check.

Hourly financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third Party Fees

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

D. Prepayment of Fees

WMKYL collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

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

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

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

Item 7: Types of Clients

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

- Individuals
- High-Net-Worth Individuals
- Pension Plans
- Small companies

Minimum Account Size for Portfolio Management

There is an account minimum of \$100,000, which may be waived by WMKYL in its discretion.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

WMKYL's methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

Charting analysis involves the use of patterns in performance charts. WMKYL uses this technique to search for patterns used to help predict 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.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

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.

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.

Investment Strategies

WMKYL uses long term trading, short term trading and options trading (including covered options, uncovered options, or spreading strategies).

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

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Quantitative Model Risk: Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

WMKYL's use of options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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.

Structured Notes are unsecured debt securities that offer the potential for periodic contingent coupon payments at an annualized rate that, if all are paid, would produce a yield that is generally higher than the yield on conventional debt securities of the same maturity. However, the contingent coupon payments may not be paid to the investor if the securities underlying the structured notes, known as the “underlyings”, depreciate in value.

In exchange for this higher potential yield, investors must be willing to accept the risks that:

- (i) the investor's actual yield may be lower than the yield on our conventional debt securities of the same maturity because investor may not receive one or more, or any, contingent coupon payments,
- (ii) the value of what the investor receives at maturity may be significantly less than the stated principal amount of the investor's securities, and maybe zero, and
- (iii) the securities may be automatically called for redemption prior to maturity beginning on the first potential auto call date specified in the attached offering materials. Each of these risks will depend solely on the performance of the worst performing of the underlyings.

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

C. Risks of Specific Securities Utilized

WMKYL's use of 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.

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, the fixed income market is volatile and 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. We do not invest significantly in ETFs.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse

changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Commodities are tangible assets used to manufacture and produce goods or services.

Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they 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 requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet 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.

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.

Structured Products will be subject to risks associated with each of the underlyings and will be negatively affected by adverse movements in any one of the underlyings. Although investor will have downside exposure to the worst performing underlying, the investor will not receive dividends with respect to any underlying or participate in any appreciation of any underlying. Investors in the structured notes must be willing to accept (i) an investment that may have limited or no liquidity and (ii) the risk of not receiving any payments due under the securities if the issuer defaults on its obligations.

On each contingent coupon payment date, unless previously redeemed, the notes will pay a contingent coupon equal to a specific amount of the stated principal amount of the notes if and only if the closing value of the worst performing underlying on the immediately preceding valuation date is greater than or equal to its coupon barrier value. If the closing value of the worst performing underlying on any valuation date is less than its coupon barrier value, the investor will not receive any contingent coupon payment on the immediately following contingent coupon payment date. If the closing value of the worst performing underlying on one or more valuation dates is less than its coupon barrier value and, on a subsequent valuation date, the closing value of the worst performing underlying on that subsequent valuation date is greater than or equal to its coupon barrier value, the investor’s contingent coupon payment for that subsequent valuation date will include all previously unpaid contingent coupon payments

(without interest on amounts previously unpaid). However, if the closing value of the worst performing underlying on a valuation date is less than its coupon barrier value and the closing value of the worst performing underlying on each subsequent valuation date up to and including the final valuation date is less than its coupon barrier value, the investor will not receive the unpaid contingent coupon payments in respect of those valuation dates.

Principal Protection: If the securities are not automatically redeemed prior to maturity, the investor will receive at maturity for each security they then hold (in addition to the final contingent coupon payment, if applicable).

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.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

In December 2016, Bruce Wayne Hanks entered into a promissory note with one of its advisors for \$5,000 which Kentucky found to be in violation of Kentucky statute KRS 292.310. Bruce Wayne Hanks entered into an order with the state and was fined \$2,500.

In October 2020, Bruce Wayne Hanks engaged in business as an agent by soliciting investments in REITs while he was neither registered nor exempt from registration which Kentucky found to be in violation of Kentucky statute KRS 292.330(3) and KRS 292.330(7). Bruce Wayne Hanks entered into an order with the state and was fined \$5,000.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither WMKYL nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither WMKYL 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. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Representatives of WMKYL are also licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Wealth Management of Kentucky, Inc. always acts in the best interest of the client, including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of Wealth Management of Kentucky, Inc. in such individuals outside capacities.

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

As noted in Item 4, the WMKYL may implement all or a portion of a client's investment portfolio with one or more Third Party Managers. WMKYL does not receive any compensation nor does this present a material conflict of interest as the Third-Party Manager fees are separate and in addition to WMKYL's fees. The Advisor will only earn its investment advisory fee as described in Item 5.

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

A. Code of Ethics

WMKYL 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. WMKYL's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of WMKYL may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of WMKYL 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 may create a conflict of interest. WMKYL 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. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of WMKYL may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WMKYL 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 may create a conflict of interest; however, WMKYL will never engage in trading that operates to the client's disadvantage if representatives of WMKYL buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

Custodians/broker-dealers will be recommended based on WMKYL's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and WMKYL may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in WMKYL's research efforts. WMKYL will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

WMKYL recommends Trade-PMR Inc., Member FINRA SIPC. Trade-PMR, Inc. has a clearing arrangement with First Clearing, LLC (CRD#46350) and Inspira.

1. Research and Other Soft-Dollar Benefits

While WMKYL has no formal soft dollars program in which soft dollars are used to pay for third party services, WMKYL may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). WMKYL may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and WMKYL does not seek to allocate benefits to client accounts

proportionate to any soft dollar credits generated by the accounts. WMKYL benefits by not having to produce or pay for the research, products or services, and WMKYL will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that WMKYL's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

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

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

WMKYL will recommend clients to use a specific broker-dealer such as Trade-PMR Inc., Member FINRA SIPC. Trade-PMR, Inc. has a clearing arrangement with First Clearing, LLC (CRD#46350) and Inspira Financial.

B. Aggregating (Block) Trading for Multiple Client Accounts

If WMKYL buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, WMKYL would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. WMKYL would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

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

All client portfolio management accounts are reviewed at least quarterly with regard to clients' respective investment policies and risk tolerance levels by management person/executive officer. All accounts at WMKYL are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by management person/executive officer. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

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

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

With respect to financial plans, WMKYL's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each client will receive the financial plan upon completion. The financial planning reports will include the following: financial definitions, summary of client assets and retirement savings, summary of retirement income, client goals and aspirations, current achievable goal status, Monte Carlo simulation (% chances of running out of money), Detailed cash flow analysis both current and projected, detailed retirement strategies, Long-term care analysis and strategies, Insurance analysis and strategies, Surplus vs shortfalls to all goals, Estate tax implications and strategies, total wealth charting, what-if scenarios, portfolio allocations both current vs recommended, historical returns, efficient frontier charting, risk questionnaire, recommended strategies and action plans.

Item 14: Client Referrals and Other Compensation

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

WMKYL does not receive economic benefits from third parties for advice rendered to clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

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

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, WMKYL will (i) maintain client written authorization and (ii) send to the custodian and the client an itemized fee invoice, detailing the formula used to calculate the fee, the assets under management the fee was based on, and the time period covered by the fee. By complying with these safeguards, WMKYL will not be deemed to have custody of client assets due to direct fee deduction. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

WMKYL provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, WMKYL generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

We will directly invest the assets deposited to your account(s) and/or strategically allocate them to separately managed accounts (each such account an "SMA") to be managed by independent third-party money managers or sub-advisors (each a "TPMM") in line with the asset allocation ranges we have determined for your portfolio. The asset allocation ranges for your portfolio may be modified over time, as your financial circumstances, needs, and investment objectives change. We will communicate these changes to your TPMMs as necessary and modify your portfolio allocations accordingly.

The TPMMs we recommend may contract with us directly to provide sub-advisory services to your account, may be accessible to us via the investment platform of your Custodian, or may contract with you independently. In some instances, you may be required to execute a separate written investment advisory agreement and/or discretionary trading authorization in favor of the recommended TPMM(s). You will be provided with the Form ADV Part 2A (or equivalent disclosures) for any recommended TPMMs in advance of their providing services to your account.

We will act as a co-advisor to each of your SMAs, periodically monitoring their performance, evaluating their initial and continuing suitability, and communicating changes in your investment profile to the TPMM, as necessary and appropriate. The TPMM shall be responsible for all trading and investment selection functions under this arrangement. WMKYL, or a third-party engaged by WMKYL, will conduct initial and ongoing due diligence on each recommended TPMM, negotiate fees to be paid by clients and other terms of the engagement, and will provide you with consolidated performance reporting of all of your SMAs.

We will monitor your investment accounts on an ongoing basis, rebalance, and reallocate your holdings (including individual securities and TPMMs), as necessary and appropriate, based upon your individual needs, stated goals, investment objectives and restrictions. We will formally review your investment accounts on the same basis to monitor for progress towards your overall financial goals and investment objectives. In general, all investment accounts are formally reviewed at least annually.

Item 17: Voting Client Securities (Proxy Voting)

WMKYL will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

WMKYL neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither WMKYL nor its management has any financial condition that is likely to reasonably impair WMKYL's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements for State Registered Advisers

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

WMKYL currently has the following management person/executive officer: Bruce Hanks. Education and business background can be found on the Form ADV Part 2B brochure supplement for such individual.

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

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

C. How Performance-based Fees are Calculated and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

In December 2016, Bruce Wayne Hanks entered into a promissory note with one of its advisors for \$5,000 which Kentucky found to be in violation of Kentucky statute KRS 292.310. Bruce Wayne Hanks entered into an order with the state and was fined \$2,500.

In October 2020, Bruce Wayne Hanks engaged in business as an agent by soliciting investments in REITs while he was neither registered nor exempt from registration which Kentucky found to be in violation of Kentucky statute KRS 292.330(3) and KRS 292.330(7). Bruce Wayne Hanks entered into an order with the state and was fined \$5,000.

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

See Item 10.C and 11.B