

**Form ADV Part 2A: Firm Brochure  
Item 1: Cover Page  
February 2017**

---



**Wellfit Financial, P.C.  
11811 N. Tatum Blvd. Suite 3031  
Phoenix, AZ 85028**

**Gregory J. Lane, President, Director and  
Chief Compliance Officer**

**Firm Website: [www.wellfitfinancial.com](http://www.wellfitfinancial.com)**

This brochure provides information about the qualifications and business practices of Wellfit Financial. If you have any questions about the contents of this brochure, please contact by telephone at (480) 688-2222 or email at [greg@wellfitfinancial.com](mailto:greg@wellfitfinancial.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 Wellfit Financial is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Please note that the use of the term "registered investment adviser" and description of Wellfit Financial and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

## Item 2: Material Changes

---

Wellfit Financial is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update. We must state clearly that we are discussing only material changes since the last annual update of our Brochure, and we must provide the date of the last annual update. Please note that we do not have to provide this information to a client or prospective client who has not received a previous version of our brochure.

Since the last annual amendment filed on 3/16/2016, the following changes have been made:

- Our fees have been amended. Please see Item 5 for more information. Please note that current clients’ fees will be affected by this change.

### Item 3: Table of Contents

---

<u>Section:</u>	<u>Page(s):</u>
Item 1. Cover Page for Part 2A of Form ADV: Firm Brochure.....	1
Item 2. Material Changes to our Part 2A of Form ADV: Firm Brochure.....	2
Item 3. Table of Contents.....	3
Item 4: Advisory Business .....	4
Item 5: Fees and Compensation .....	5
Item 6: Performance-Based Fees and Side-By-Side Management .....	7
Item 7: Types of Clients and Account Requirements.....	7
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.....	7
Item 9: Disciplinary Information .....	8
Item 10: Other Financial Industry Activities and Affiliations .....	8
Item 11: Code of Ethics, Participation or Interest in Client Transactions, and Personal Trading .....	8
Item 12: Brokerage Practices .....	9
Item 13: Review of Accounts or Financial Plans.....	12
Item 14: Client Referrals and Other Compensation .....	12
Item 15: Custody.....	13
Item 16: Investment Discretion.....	13
Item 17: Voting Client Securities.....	13
Item 18: Financial Information.....	14
Item 19: Requirements for State-Registered Advisers .....	14

## **Item 4: Advisory Business**

---

We are dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a Professional Corporation formed in the State of Arizona. Our firm has been in business as an investment adviser since 2009 and is 100% owned by Gregory J. Lane. Mr. Lane has been acting as an investment advisory representative since 1995.

### **Description of the Types of Advisory Services We Offer**

---

#### **Asset Management:**

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of traded funds (“ETFs”), mutual funds and other public securities or investments. The client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio annually based upon the client’s individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

Our firm utilizes the sub-advisory services of Advisor Partners on some accounts. Before selecting a firm or individual, our firm will ensure that the chosen party is properly licensed or registered. Clients directly sign a discretionary investing agreement with Advisor Partners.

#### **Financial Planning & Consulting:**

We provide a variety of financial and investment consulting services to individuals, families and other clients regarding the management of their financial resources based upon an analysis of client’s current situation, goals, and objectives. Generally, such financial consulting services will involve preparing a financial plan or rendering a financial consultation for clients based on the client’s financial goals and objectives. This consulting may encompass one or more of the following areas: Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Personal Tax Planning, Mortgage/Debt Analysis, Insurance Analysis, Business and Personal Financial Planning.

Our written financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients.

For example, recommendations may be made that the clients begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services. We do not have any compensation arrangements with third parties. For written financial planning engagements, we provide our clients with a written summary of their financial situation, observations, and recommendations. For financial consulting engagements, we usually do not provide our clients with a written summary of our observations and recommendations as the process is less formal than our planning service. Consultations are typically completed within six (6) months of the client signing a contract with us, assuming that all the information and documents we request

from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client.

### **Tailoring of Advisory Services**

---

We offer individualized investment advice to clients utilizing our Asset Management service offered by our firm. Additionally, we offer general investment advice to clients utilizing our Financial Consulting service.

We usually do not allow clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their account. In the rare instance that we would allow restrictions, it would be limited to our Asset Management service. We do not manage assets through our other services.

### **Participation in wrap fee programs**

---

We do not offer wrap fee programs.

### **Regulatory Assets Under Management**

---

As of December 31, 2016 we manage \$9,869,070 on a non-discretionary basis.

## **Item 5: Fees and Compensation**

---

We are required to describe our brokerage, custody, fees and fund expenses so you will know how much you are charged and by whom for our advisory services provided to you. Our fees are generally not negotiable.

### **How We Are Compensated for Our Advisory Services**

---

#### **Asset Management:**

#### **Option 1:**

<b>Assets Under Management</b>	<b>Annual Percentage of Assets Charge</b>
\$0 to \$249,999.99	1.65%
\$250,000 to \$999,999.99	1.25%
\$1,000,000 to \$2,499,999.99	1.00%
\$2,500,000 +	.75%

#### **Option 2:**

Our firm may choose to charge clients a flat fee on an annual basis, paid in quarterly installments that will not exceed 3% of assets under management. This initial fee will be calculated based on the value of the initial date of the engagement and will be recalculated annually.

Our firm's fees are billed on a pro-rata annualized basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees will generally be automatically deducted from your managed account. Adjustments will be made for deposits and withdrawals during the

quarter. In rare cases we will agree to directly bill clients. As part of this process, you understand and acknowledge the following:

- a) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the Assets and all disbursements in your account including the amount of the advisory fees paid to us;
- b) You provide authorization permitting us to be directly paid by these terms. We send our invoice directly to the custodian;
- c) It is the client's responsibility to verify the calculation of advisory fees deducted from the account; and
- d) We send a copy of our invoice to you, which includes a legend urging you to compare information provided in our statement with those from the qualified custodian.

For the sub-advisory services rendered to our clients, the client compensates our firm and the third party investment advisory firm. Our firm will receive a percentage of the overall investment advisory fee charged by our firm. The advisory fee paid to the sub-advisor ranges from 0.25 to 0.35%, and shall not exceed the fee published for this service.

### **Financial Planning & Consulting:**

We charge on an hourly or flat fee basis for financial planning and consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fees are no more than \$350/hour. Flat fees generally range from \$1,500 to \$10,000, which may be negotiable in certain circumstances, depending upon the level and scope of the services provided.

We require fees to be paid in full upon execution of the Financial Planning and Consulting Agreement. In all cases, we will not require a retainer exceeding \$500 when services cannot be rendered within 6 (six) months.

### **Other Types of Fees & Expenses**

---

Clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the firm that the trades are executed through. In certain circumstances the fees will be covered by Wellfit Financial. Also, clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

### **Termination & Refunds**

---

We charge our advisory fees quarterly in advance. In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees.

### **Commissionable Securities Sales**

---

We do not sell securities for a commission. In order to sell securities for a commission, we would need to have our associated persons registered with a broker-dealer. We have chosen not to do so.

---

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

---

We do not charge performance fees to our clients.

---

## **Item 7: Types of Clients and Account Requirements**

---

We provide services to Individuals and High Net Worth Individuals. To engage our firm, we require a minimum fee of \$1,500 for written financial plans for engaging our firm.

---

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

---

---

### **Methods of Analysis**

---

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

- Fundamental
- Technical
- Cyclical

---

### **Investment Strategies We Use**

---

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

- Long term purchases (securities held at least a year)
- Short term purchases (securities sold within a year)

---

### **Risk of Loss**

---

Investing in securities involves risk of loss that clients should be prepared to bear. While the stock market may increase and your account(s) could enjoy a gain, it is also possible that the stock market may decrease and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market, are appropriately diversified in your investments, and ask us any questions you may have.

---

### **Description of Material, Significant or Unusual Risks**

---

We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to our Asset Management service, as applicable.

---

### **Item 9: Disciplinary Information**

---

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

---

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

---

Our firm is also a CPA firm licensed with the Arizona State Board of Accountancy. Greg Lane is a licensed, practicing Certified Public Accountant. Wellfit Financial and Mr. Lane provide client financial planning, insurance sales, financial planning teaching and continuing education to financial planners. Mr. Lane spends 50% of his time on the CPA firm. This activity will not result in any commissions paid to Mr. Lane or Wellfit Financial. To mitigate any potential conflict of interest, clients are under no obligation to engage Mr. Lane for this service or implement plans through Wellfit Financial.

Mr. Lane also conducts seminars and webinars for Surgent Professional Education.

Please see Item 4 above for more information about the selection of third party money managers. The compensation paid to the third party managers may vary, and thus, creates a conflict of interest in recommending a manager who shares a larger portion of its advisory fees over another manager. Prior to referring clients to third party advisors, our firm will ensure that third party advisors are licensed or notice filed with the respective authorities. A potential conflict of interest in utilizing third party advisors may be an incentive to us in selecting a particular advisor over another in the form of fees or services. In order to minimize this conflict our firm will make our recommendations/selections in the best interest of our clients.

---

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

---

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner



and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

## **Item 12: Brokerage Practices**

---

Our firm has an arrangement with Shareholders Service Group (“SSG”) and Pershing LLC., (“Pershing”). Under the arrangement with SSG and Pershing we receive services which include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support our firm in conducting business and in serving the best interests of our clients but that may benefit our firm. Wellfit Financial is not affiliated with SSG and Pershing. SSG and Pershing do not supervise Wellfit Financial, its agencies, or its activities.

SSG and Pershing also makes certain research and brokerage services available at no additional cost to our firm. These services include certain research and brokerage services, including research services obtained by SSG and Pershing directly from independent research companies, as selected by our firm (within specific parameters).

Research products and services provided by SSG and Pershing to our firm may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by SSG and Pershing to our firm in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services for no additional cost, we may have an incentive to continue to use or expand the use of SSG and Pershing’s services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with SSG and Pershing and we have determined that the relationship is in the best interest of our firm’s clients and satisfies our client obligations, including our duty to seek best execution.

SSG and Pershing charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). SSG and Pershing enable us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. SSG and Pershing’s commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by SSG and Pershing may be higher or lower than those charged by other custodians and broker-dealers.

Our non-wrap fee program clients may pay a commission to SSG and Pershing that is higher than another qualified broker dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer’s services, including the value of research provided, execution capability,

commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

### **Soft Dollars**

---

Although the investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Our firm does not accept products or services that do not qualify for Safe Harbor outlined in Section 28(e) of the Securities Exchange Act of 1934, such as those services that do not aid in investment decision-making or trade execution.

### **Client Brokerage Commissions**

---

In addition to the benefits described, SSG and Pershing also makes available to our firm products and services that help manage and administer clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from clients' accounts, and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of our accounts, including accounts not maintained at SSG and Pershing.

While, as a fiduciary, our firm endeavors to act in our clients' best interests, Adviser's recommendation/requirement that clients maintain their assets in accounts at SSG and Pershing may be based in part on the benefit to our firm of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost, or quality of custody and brokerage services provided by SSG and Pershing, which may create a potential conflict of interest.

We would have to obtain the aforementioned services and products for cash if we did not have soft dollars available to pay for them. As a result of receiving such products and services for no cost, we may have an incentive to continue to place client trades through broker-dealers that offer soft dollar arrangements. This interest conflicts with the clients' interest of obtaining the lowest commission rate available. Therefore, we must determine in good faith, based on the best execution policy stated above that such commissions are reasonable in relation to the value of the services provided by such executing broker-dealers.

### **Procedures to Direct Client Transactions in Return for Soft Dollars**

---

All soft dollar arrangements must be approved in writing by our Chief Compliance Officer. A brief description of the purpose of the soft dollar arrangement outlining the benefits received by our firm and clients along with any noted concerns about increased costs to our clients and how such concerns were alleviated will be maintained on file. Our Chief Compliance Officer undertakes a review of parties which propose to pay our firm in soft dollars and analyzes a number of criteria. When deciding whether to approve or disapprove of a soft dollar relationship, the following criteria is reviewed: the broker-dealer's business reputation and financial position and our ability to consistently execute

orders professionally and on a cost effective basis, provide prompt and accurate execution reports, prepare timely and accurate confirms, deliver securities or cash proceeds promptly and provide meaningful research services that are useful to us in investment decision-making or other desired and appropriate services. Our Chief Compliance Officer also annually reviews all our soft dollar relationships for appropriateness, benefits to our clients, etc.

As a fiduciary, we have an obligation to obtain "best execution" of clients' transactions under the circumstances of the particular transaction. Consequently, notwithstanding the safe harbor provided under Section 28(e), no allocation for soft dollar payments shall be made unless best execution of the transaction is reasonably expected to be obtained.

### **Brokerage for Client Referrals**

---

Our firm does not compensate brokers for client referrals.

### **Directed Brokerage**

---

We or any of our firm's related person do not have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected.

### **Special Considerations for ERISA Clients**

---

A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, we will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

### **Aggregation of Purchase or Sale**

---

We perform investment management services for various clients. There are occasions on which portfolio transactions may be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

---

### **Item 13: Review of Accounts or Financial Plans**

---

We review accounts on at least a quarterly basis for our clients subscribing to our Asset Management service. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. We do not provide written reports to clients, unless asked to do so. Verbal reports to clients take place on at least an annual basis when we contact clients who subscribe to our Asset Management, service. Only our Financial Advisors or Portfolio Managers will conduct reviews.

Financial Planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. We do not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc. Financial Planning clients do not receive written or verbal updated reports regarding their financial plans unless they separately contract with us for a post-financial plan meeting or update to their initial written financial plan.

We may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

---

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

---

#### **Pershing**

---

We may recommend that a client in need of brokerage and custodial services utilize Shareholders Service Group ("SSG") and Pershing LLC, ("Pershing) among others. It may be the case that the recommended broker charges a higher fee than another broker charges for a particular type of service, such as commission rates. Clients may utilize the broker/dealer of their choice and have no obligation to purchase or sell securities through such broker as our firm recommends.

In selecting a broker/dealer, we will endeavor to select those broker/dealers that will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on several factors, including the broker/dealer's ability to provide professional services, competitive commission rates, volume discounts, execution price negotiations, and other services. When consistent with our firm's fiduciary duty of best execution, the firm will direct trades to any of the suggested broker/dealers listed above.

Some clients may instruct us to use one or more particular broker/dealers for the transactions in their accounts. Clients who may want to direct our firm to use a particular broker/dealer should understand that this might prevent us from effectively negotiating brokerage compensation on their behalf. This arrangement may also prevent us from obtaining the most favorable net price and execution. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that they will obtain through their broker/dealer are adequately favorable in comparison to those that our firm would otherwise obtain for its clients.

We may receive research and execution related services from SSG and Pershing to assist our firm in managing its accounts. These services and products would include financial publications, pricing information and other products or services. Such research and execution related services are offered to all investment advisers who utilize these firms. However, the commissions charged by these parties may

be higher than those charged by a broker who does not provide the aforementioned research and execution related services.

## **Referral Fees**

---

We do not pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with our state statutes or rules.

## **Item 15: Custody**

---

State Securities Bureaus or their equivalent generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian is deemed to have custody of client funds and securities. As such, we have adopted the following safeguarding procedures:

- (1) Our clients must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of our firm;
- (2) We must send a statement to our clients showing the amount of our fee, the value of your assets upon which our fee was based, and the specific manner in which our fee was calculated;
- (3) We must disclose to you that it is your responsibility to verify the accuracy of our fee calculation, and that the custodian will not determine whether the fee is properly calculated; and
- (4) Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account. Wellfit Financial is not affiliated with SSG and Pershing. SSG and Pershing do not supervise Wellfit Financial, its agents, or its activities.

## **Item 16: Investment Discretion**

---

We do not accept discretionary authority to manage securities accounts on behalf of clients. Third party money managers selected or recommended by our firm may accept discretionary authority to manage securities accounts on behalf of clients. A separate agreement will be in place between the client and the third party money manager to grant discretionary authority.

## **Item 17: Voting Client Securities**

---

We do not and will not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations. Third party money managers selected or recommended by our firm may vote proxies for clients. Therefore, except in the event a third party money manager votes proxies, clients maintain exclusive responsibility for: (1) directing the manner

in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Therefore (except for proxies that may be voted by a third party money manager), our firm and/or you shall instruct your qualified custodian to forward to you copies of all proxies and shareholder communications relating to your investment assets.

---

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

---

We are not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$500 in fees and six or more months in advance.
- We do not take custody of client funds or securities.
- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

We have never been the subject of a bankruptcy proceeding.

---

### **Item 19: Requirements for State-Registered Advisers**

---

#### **Greg Lane**

Born 1956

#### **Formal Education after High School:**

- 2007–Professionally qualified faculty certification from AACSB International, Georgia State University
- 1983 – Master of Accountancy with emphasis in Taxation, Arizona State University
- 1978 – Bachelor of Science in Finance, University of Southern California

#### **Business Experience:**

- 03/1995 – Present Wellfit Financial, President, Director and Chief Compliance Officer (from February 2009) (formerly Lane Financial, P.C.)
- 05/2001 – 03/2009 FSC Securities Corporation, Registered Representative
- 05/1995 – 03/2009 Aegis Financial Group, Inc., Investment Advisor Representative (IAR)

#### **Professional Licenses and Exams:**

- Certified Financial Planner (CFP®)
- Certified Public Accountant (CPA)

#### **Lisa Jane Lane**

Year of Birth: 1956

#### **Formal Education after high school:**

- 1995-1997 – Financial Planner Professional Education Program, College for Financial Planning in Denver
- 1979 – Bachelor of Health Science in Nutrition, University of Florida

**Business Background:**

- 05/2003 – Present Wellfit Financial, Vice-President,
- 05/2001 – 03/2009 FSC Securities Corporation, Registered Representative

Please see Item 10 of this Firm Brochure for any other business in which we are actively engaged. We do not charge performance-based fees. Our firm and management persons have not been involved in any arbitration awards, found liable in any civil, self-regulatory organization or administrative proceedings or have any relationships with issuers or securities apart from what is disclosed above.

Our firm does not have compensation arrangements connected with advisory services which are in addition to our advisory fees. Our management persons and representatives do not engage in other financial industry activities or affiliations. As a fiduciary, we always put our Client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 11 of this Brochure. You may obtain a copy of our Code of Ethics by contacting Greg Lane, Chief Compliance Officer at (480) 688-2222.