

Item 1 – Cover Page

WBH FINANCIAL SERVICES, LLC

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www.wbhfinancialservices.com

March 30, 2021

This Brochure provides information about the qualifications and business practices of WBH Financial Services, LLC. If you have any questions about the contents of this Brochure, you may contact us at 503-699-9200 or brent@wbhfinancialservices.com to obtain answers and additional information. WBH Financial Services, LLC is a registered investment adviser with the State of Oregon. Registration of an investment adviser does not imply any level of skill or training. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about WBH Financial Services, LLC is available on the SEC’s website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for WBH Financial Services, LLC is 282071.

Item 2 – Material Changes

The date of our previous annual update to this Brochure was March 30, 2020. Since that date, we have made no material changes.

We will ensure that all current Clients receive a Summary of Material Changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. A Summary of Material Changes is also included with our Brochure on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for WBH Financial Services, LLC is 282071. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Wm. Brent Hamilton, Compliance Officer of WBH Financial Services, LLC at 503-699-9200 or brent@wbhfinancialservices.com. Our Brochure is provided free of charge.

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Item 4 – Advisory Business

A WBH Financial Services, LLC (“WBH” “we” or “us”) is a registered investment advisory firm located in Lake Oswego, Oregon that is registered with the State of Oregon. We provide financial planning and investment management services. The firm has been in business since 2015 and the principal owner is Wm. Brent Hamilton. Our investment advisory services are driven by and coordinated with each Client’s individual financial goals. Our approach uses broadly diversified portfolios and a systematic strategy to manage investments. We follow strict fiduciary standards, putting our Clients’ interests before our own and seeking to avoid conflicts of interest with our Clients.

B, C We help Clients coordinate and prioritize their financial lives with all aspects of their life goals. Integrating investments across all individual retirement accounts, taxable accounts, and employee retirement accounts is crucial to the process. Client input and involvement are critical parts of the financial planning process and implementation of investment decisions. After Client assets are invested, we monitor their investments and provide advice related to ongoing financial and investment needs. We are objective advisors, and we always put our Clients’ interests first.

WBH Financial Services, LLC has discretionary and non-discretionary authority over Client funds. Discretionary authority means that we may buy or sell client securities without first obtaining client consent. Non-discretionary authority means that we must obtain Client consent regarding the securities bought or sold and the amount of securities bought or sold prior to making the transaction on the Client’s behalf.

We offer the following financial planning services to Clients:

- Investment Planning/Investment Policy Statements
- Retirement Planning/Financial Independence
- Capital Needs Analysis (Goal Funding)
- Debt Reduction
- Income Tax Planning
- Estate Planning
- College/Education Planning
- Divorce Planning and Consultation
- Risk Management (Life and Disability Insurance)
- Philanthropic Planning
- Cash flow and Net Worth Update
- Other Projects

A conflict exists between the interests of the investment adviser and the interests of the Client. The Client is under no obligation to act upon the investment adviser’s recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through the investment adviser.

Advice and services are tailored to the stated objectives of the Client(s). We discuss with the Client in detail critically important information, such as the Client's risk tolerance, time horizon, and projected future needs, to formulate an investment policy. This policy guides us in objectively and suitably managing the Client's account. We meet with Clients as needed to review portfolio performance, discuss current issues, and re-assess goals and plans.

Our approach uses broadly diversified portfolios and a systematic strategy to manage investments. Our investment recommendations generally include mutual funds, exchange-traded funds, and exchange-listed and non-exchange-listed equity securities. We also recommend certificates of deposit, municipal securities, U.S. government securities, and money market funds. If Clients hold other types of investments, we will advise them on those investments also. Clients may impose restrictions on investing in certain securities or types of securities. We consider such restrictions when preparing the Investment Policy Statement.

As part of the services offered to Clients, we may provide certain advisory services with respect to assets of the Client that include a (i) pension or other employee benefit plan (including any 401(k) plan) governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"); (ii) tax-qualified retirement plan (including a Keogh plan) under Section 401(a) of the Internal Revenue Code, as amended (the "Code"), and not covered by ERISA; and/or (iii) an individual retirement account ("IRA") under Section 408 of the Code. If certain Client assets are for a plan subject to ERISA, the Client appoints the Advisor, and the Advisor accepts its appointment, as an "investment manager" for purposes of ERISA and the Code, and the Advisor acknowledges that it is a "fiduciary" within the meaning of Section 3(21) of ERISA and Section 4957(e)(3) of the Code (but only with respect to the provision of services described in Section 1 of this Agreement).

See Item 8 for a description of our investment strategy.

We follow strict fiduciary standards as required by the Securities Act of Oregon and the rules thereunder putting our Clients' interests before our own and seeking to avoid conflicts of interest with our Clients. We are compensated only by our Clients. Nonetheless, conflicts of interest do exist between our interests and our Clients' interests. Thus, our Clients are not obligated to act on our recommendations, or they can act on one or more of our recommendations without transacting business directly with us.

- D** We do not participate in or sponsor any wrap-fee programs
- E** We manage \$27,595,620 of Client assets on a discretionary basis and \$74,287 of Client assets on a non-discretionary basis. This amount was calculated as of December 31, 2020.

Item 5 – Fees and Compensation

- A** WBH provides investment advisory and financial planning services to its Clients. Services may include the analysis of the Client's current portfolio, development of an investment

policy statement, implementation of a recommended portfolio(s), and ongoing monitoring of the investment portfolio(s).

WBH charges annual fees for managing Clients' portfolios. The fees charged vary according to the amount of assets under management, as detailed in the following fee schedule:

Account Assets	% Fee Charged
On the first \$100,000	1.00
On the next \$150,000	0.75
On the next \$250,000	0.75
On the next \$500,000	0.75
On the next \$1,000,000	0.50
On the next \$3,000,000	0.50
On the next \$5,000,000	0.25
On amounts over \$10,000,000	0.15

* WBH has no set account minimum, and fees are generally negotiable.

We also offer investment consultations or financial planning services at an hourly or fixed fee rate. Hourly consulting or financial planning rates range from \$250 per hour. Fixed fee projects are estimated to range from \$500 - \$2,750. Pricing will be developed on a project-by-project basis for each Client, also depending on the complexity, scope of work to be performed, expertise of the IAR providing the services, and the estimated time required to complete the project. Examples of the factors contributing to the determination of the fixed fee rate may include the complexity of the project, the scope of work to be performed, and the differential expertise of the IAR providing the services. Lower fees for comparable services may be available from other sources. Advisor does not require the prepayment six months or more in advance of more than \$500 of advisory fees.

Finally, WBH offers special planning packages for those clients whose unique circumstances require expert guidance and planning, without the commitment of full asset management services. The fees for such planning services range from \$1,200 to \$10,000, depending on the client's situation, and are payable in equal installments over a period of up to two years. Planning package clients are eligible to receive a waiver of advisory fees for the first \$5,000 invested, as well as an up to 0.25% discount on asset management charges.

- B** We bill the Client quarterly in advance. Fees are paid directly to us from the account by the custodian upon our submission of an invoice to custodian. Payment of fees may result in the liquidation of Client's securities if there is insufficient cash in the account. The fee is based on the market value of the Client's account at the end of the prior quarter. Planning fees may be billed directly to the client and paid via check or credit card.

Market value means the value of all assets in the account (not adjusted by any margin debit). To determine value, securities and other instruments traded on a market for which actual transaction prices are publicly reported shall be valued at the last reported sale price on the principal market in which they are traded (or, if there shall be no sales on such date, then at

the mean between the closing bid and asked prices on such date). Other readily marketable securities and other instruments shall be priced using a pricing service or through quotations from one or more dealers. All other assets shall be valued at fair value by WBH and in accordance with WBH fiduciary duty.

Fees for a partial quarter at the commencement or termination of an agreement will be prorated based on the number of days the account was open during the quarter.

For most fixed fee and hourly projects 50% of the fixed fee or of the estimated total project cost for hourly projects shall be billed and prepaid up front with the remainder immediately due and payable upon completion of the project. Some planning projects are billed monthly. If a fixed fee project is terminated within 48 hours of signing an agreement, no fees will be due. If a project is terminated after such time, client is responsible for all work previously performed, and any fees may be prorated with unearned fees promptly refunded to the client.

C Clients pay brokerage transaction costs and other charges directly to the custodian. See Item 12. Clients may be required to pay, in addition to WBH's fee, a proportionate share of any Exchange Traded Fund's ("ETF") or mutual fund's fees and charges. For example, Mutual fund operating expenses are paid out of the fund and are an additional expense incurred by the Client.

D Clients pay all advisory fees quarterly or hourly, in advance. As such, there occasionally may be pre-paid fees that will be subject to refund. Fixed fee projects may require one half of the fixed fee to be paid up front, with the balance due upon completion of the project.

New accounts are pro-rated from the time we begin charging a fee to the Client. Fees for partial quarters at the commencement or termination of this Agreement will be billed on a pro-rated basis contingent on the number of days the account was open during the quarter. Additionally, all service agreements may be terminated at any time by providing us with 15 days written notice. Any compensation paid for services beyond the time the agreement was terminated in writing will be refunded to the Client.

Upon termination of any fixed fee project, any prepaid but unearned fees will be promptly refunded by WBH and any partially completed plan will be delivered to the Client in its partially completed form. Any fees that have been earned by WBH but not yet paid by Client will be immediately due and payable.

If WBH has provided the Client a copy of its Form ADV Part 2 less than forty-eight hours prior to entering into any investment advisory contract or if WBH provided the Client a copy of its Form ADV Part 2 at the time of entering into the investment advisory agreement, then the Client may terminate the investment advisory agreement without penalty within five business days after entering into the contract. Alternatively, the investment advisory agreement may be terminated at any time by either party by providing 15 days written notice to the other party.

- E** WBH principal, Brent Hamilton, is licensed to sell insurance products in one or more states. However, he does not offer or sell insurance products and does not receive commissions. Mr. Hamilton only holds that insurance license in order to provide advice and counsel on insurance products in connection with providing clients financial planning and investment advisory services.

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

WBH does not charge any performance-based fees for its services. Accordingly, this item is not applicable to our firm.

Item 7 – Types of Clients

We provide investment advice to individuals, businesses, pension and profit-sharing plans, trusts, estates, and charitable organizations. Because each Client is unique, they must be willing to be involved in the planning and ongoing processes. Such involvement does not have to be time consuming, however we want our Clients to remain informed and have a sense of security about their investments. WBH has no minimum account size for opening or maintaining an account.

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

- A** WBH believes in a long-term, balanced, disciplined approach to investing. As such, we build globally diversified portfolios that typically include stocks, bonds, real estate, and cash. These asset classes are accessed via mutual funds and exchange traded funds. Investing takes place within the context of the plan that is tailored to each Client's unique situation. We develop a statement of investment policy with each Client, outlining the investment philosophy, management procedures, long-term goals, risk tolerance, and other factors as they pertain to the investor(s). Numerous studies and statistics have shown that a stable, disciplined investment approach with a long-term perspective yields better long-term results than a rapid trading, market timing approach.

As part of our core investment approach, we purchase on behalf of Clients investments including (but not limited to) the following:

- Mutual Fund shares
- Exchange Traded Fund shares
- Publicly and non-publicly traded securities
- Corporate debt securities
- Certificates of deposit
- Municipal securities
- United States government and agency securities

We primarily research and review securities using traditional fundamental analysis. The primary investment strategies used to implement investment advice given to Clients include long-term (securities held at least one year) and short-term (securities sold within a year) purchases. The fundamental analysis of securities is used in conjunction with modern

portfolio theory to generate diversified portfolios of securities based on the individual Client's investment goals and risk tolerance profile. While this practice does mediate some investment risk, it cannot mediate all investment risk. This residual systemic risk includes, but is not limited to, interest rate risk, inflation risk, market risk, corporate risk, geopolitical risk, and risk due to war or natural disasters.

The main sources of information we rely upon when researching and analyzing securities include traditional research materials such as financial newspapers and magazines, annual reports, prospectuses, filings with the SEC, as well as research materials prepared by others and company press releases. We also subscribe to various professional publications deemed to be consistent and supportive of our investment philosophy.

- B** We use our best judgment and good faith efforts in rendering services to Client. We cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Not every investment recommendation we make will be profitable. Investing in securities involves risk of loss that Clients should be prepared to bear. Clients assume all market risk involved in the investment of account assets. Investments are subject to various market, currency, economic, political, and business risks.

Except as may otherwise be provided by law, we are not liable to Clients for:

- any loss that Clients may suffer by reason of any investment recommendation we made with that degree of care, skill, and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; or
- any independent act or failure to act by a custodian of Client accounts.

It is the responsibility of the Client to give us complete information and to notify us of any changes in financial circumstances or goals.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a potential conflict of interest because we have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of a rollover.

Note that an employee will typically have four options in this situation:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will discuss with you the advantages and disadvantages of both types of accounts prior to proceeding.

Item 9 – Disciplinary Information

WBH is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of our firm, or the integrity of our management. No principal or person associated with WBH has any information to disclose which is applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

As described in Item 5.E. above, Mr. Hamilton is a licensed insurance agent. However, he does not actively sell insurance products to advisory clients.

Mr. Hamilton also provides tax consulting and preparation services to Clients for a fixed fee. Clients are informed that they may be able to obtain similar services elsewhere at a better rate.

Item 11 – Code of Ethics, Participation or Interest in Client Transaction & Personal Trading

A WBH has a Code of Ethics which all employees are required to follow. The Code of Ethics outlines our high standard of business conduct, and fiduciary duty to Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things.

A copy of the code of ethics is available to any Client or prospective Client upon request by contacting Wm. Brent Hamilton at 503 699-9200 or brent@wbhfinancialservices.com.

B, C, D We do not own or manage any companies or investments that we advise our Clients to buy.

WBH or individuals associated with our firm may buy and sell some of the same securities for their own account that WBH buys and sells for its Clients. When appropriate we will purchase or sell securities for Clients before purchasing the same for our account or allowing representatives to purchase or sell the same for their own account. In some cases, WBH or representatives may buy or sell securities for their own

account for reasons not related to the strategies adopted for our Clients. Our employees are required to follow the Code of Ethics when making trades for their own accounts in securities which are recommended to and/or purchased for Clients. The Code of Ethics is designed to assure that the personal securities transactions will not interfere with decisions made in the best interest of advisory Clients while at the same time, allowing employees to invest their own accounts.

WBH will disclose to advisory Clients any material conflict of interest relating to us, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

As any advisory situation could present a conflict of interest, we have established the following restrictions to ensure our fiduciary responsibilities:

1. A director, officer, associated person, or employee of WBH shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public on reasonable inquiry. No person of WBH shall prefer his or her own interest to that of the advisory Client.
2. WBH maintains a list of all securities holdings for itself and for anyone associated with its advisory practice that has access to advisory recommendations. An appropriate officer of WBH reviews these holdings on a regular basis.
3. Any individual not in observance of the above may be subject to termination.

Item 12 – Brokerage Practices

A Our Clients' assets are held by independent third-party custodians. The Client is not obligated to effect transactions through any broker-dealer recommended by WBH. In recommending broker-dealers, WBH will comply with its fiduciary duty to seek best execution and with State securities laws or the Securities Exchange Act of 1934 and will take into account such relevant factors as:

- Price;
- The custodian's facilities, reliability and financial responsibility;
- The ability of the custodian to effect transactions, particularly with regard to such aspects as timing, order size and execution of order; and
- Any other factors that we consider to be relevant.

Generally speaking, we will recommend that Clients establish brokerage accounts with TD Ameritrade ("TDA") a registered broker-dealer and SIPC member, so long as TDA continues to meet the above criteria. We work primarily with TDA for administrative convenience and also because TDA offers a good value to our Clients for the transaction costs and other costs incurred.

B WBH may aggregate trades for Clients. The allocations of a particular security will be determined by WBH Financial Services before the trade is placed with the broker. When

practical, Client trades in the same security will be bunched in a single order (a “block”) in an effort to obtain best execution at the best security price available. When employing a block trade:

- WBH will make reasonable efforts to attempt to fill Client orders by day-end.
- If the block order is not filled by day-end, WBH will allocate shares executed to underlying accounts on a pro rata basis, adjusted as necessary to keep Client transaction costs to a minimum.
- If a block order is filled (full or partial fill) at several prices through multiple trades, an average price and commission will be used for all trades executed.
- All participants receiving securities from the block trade will receive the average price.
- Only trades executed within the block on the single day may be combined for purposes of calculating the average price.

It is expected that this trade aggregation and allocation policy will be applied consistently. However, if application of this policy results in unfair or inequitable treatment to some or all of WBH’s Clients, WBH may deviate from this policy.

Item 13 – Review of Accounts

- A** Accounts are reviewed by Wm. Brent Hamilton who is responsible for overseeing all investment advisory activities for the firm. See Mr. Hamilton’s Form ADV Part 2B, Item 2, for information about his professional designations.

The frequency of reviews is determined based on the Client’s investment objectives. Accounts are generally reviewed quarterly, but in any event, no less than annually.

- B** More frequent reviews may be triggered by a change in Client’s investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in the economic climate.
- C** Investment advisory Clients receive standard account statements from the custodian of their accounts on a monthly basis. WBH also provides Clients with a written report summarizing the account activity generally quarterly, but in any event, no less than annually.

Item 14 – Client Referrals and Other Compensation

We do not compensate, nor receive compensation from, any third parties in connection with any services we provide for Clients, including referrals.

Item 15 – Custody

With the exception of WBH’s ability to debit fees, WBH does not otherwise have custody of the assets in the account. Clients provide written authority to have fees debited from their accounts when they review and sign WBH’s Investment Advisory Agreement. They also provide the Custodian the authority to release fee payments from their accounts when they sign the custodial

account application. We urge Clients to review their account statements carefully and compare the accounts statements to the invoice provide to them for the same period.

WBH shall have no liability to the Client for any loss or other harm to any property in the account, including any harm to any property in the account resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation (“SIPC”) or any other insurance which may be carried by the custodian. The Client understands that SIPC provides only limited protection for the loss of property held by a custodian.

Item 16 – Investment Discretion

Clients may grant WBH ongoing and continuous discretionary authority to execute its investment recommendations in accordance with WBH’s Statement of Investment Policy (or similar document used to establish each Client’s objectives and suitability), without the Client’s prior approval of each specific transaction. Under this discretionary authority, Client allows WBH to purchase and sell securities and instruments in their account(s), arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on behalf of the Client in matters necessary or incidental to the handling of the account, including monitoring certain assets.

Clients may also grant WBH non-discretionary authority to execute its investment recommendations. Non-discretionary authority requires WBH to obtain a Client’s prior approval of each specific transaction prior to executing the investment recommendations.

Item 17 – Voting Client Securities

- A** Without exception, we do not vote proxies on behalf of Clients. Additionally, we will not provide advice to Clients on how the Client should vote.
- B** We do not have authority to vote Client securities. Clients will receive proxies and other solicitations directly from the custodian or transfer agent. If any proxy materials are received on behalf of a Client, they will be sent directly to the Client or a designated representative of the Client, who is responsible to vote the proxy.

Item 18 – Financial Information

- A** WBH does not require or solicit prepayment of more than \$500 in fees per Client, six month or more in advance.
- B** We have no financial commitments that would impair our ability to meet contractual and fiduciary commitments to Clients.
- C** Neither WBH, nor any of the principals, have been the subject of a bankruptcy petition at any time in the past.

Item 19 – Requirements for State-Registered Advisers

- A** Wm. Brent Hamilton is a Managing Member and the Compliance Officer of WBH. He provides investment advisory services to Clients and is responsible for the day to day management and operations of the firm. Mr. Hamilton’s education and background are separately detailed in his Form ADV Part 2B, Item 2.
- B** WBH is a fee-only registered investment advisor. Mr. Hamilton also provides tax preparation and consultation as a separate service for a fee. Other than what is disclosed herein, we are not actively engaged in any other business activities outside of providing investment advisory and financial planning services.
- C** We do not receive performance-based fees.
- D** We have not been subject to any arbitration claims or any other proceedings (civil, self-regulatory organization or administrative).

Apart from those arrangements listed in Item 10 above, we have no arrangements or other financial industry affiliations to disclose which would be considered material to our business or to our Clients or which would present any material conflicts of interests with Clients.

WILLIAM BRENT HAMILTON, MS, CFP[®], EA, CDFP[®]

WBH FINANCIAL SERVICES, LLC

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www.wbhfinancialservices.com

March 30, 2021

This Brochure Supplement provides information about William Brent Hamilton that supplements the WBH Financial Services, LLC Firm Brochure (Form ADV Part 2A). You should have received a copy of that Brochure. Please contact us at 503-699-9200 or brent@wbhfinancialservices.com if you did not receive copy of WBH Financial Services, LLC's Form ADV Part 2A or if you have any questions about the contents of this Brochure Supplement.

Additional information about William Brent Hamilton is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for William Brent Hamilton is 1582290.

WILLIAM BRENT HAMILTON, MS, CFP®, EA, CDFA®

Year of Birth: 1952

Item 2 – Educational Background and Business Experience

EDUCATION

Certification as Certified Divorce Financial Analyst, Institute for Divorce Financial Analysts, 2016

Master of Science, Personal Financial Planning, College of Financial Planning, 2015

Certificate of Financial Planning, College of Financial Planning, 1994

Bachelor of Science, Economics, Portland State University, 1978

Bachelor of Science, Finance, Portland State University, 1978

BUSINESS BACKGROUND

11/2015 to Present Investment Advisor Representative & Principal, WBH Financial Services, LLC

02/1988 to 10/2015 Principal, WBH Financial Services

06/2014 to Present Shareholder / President, Women Transitions Co.

06/1990 to 12/2015 Investment Advisor Representative, KMS Financial Services, Inc.

02/1988 to 12/2015 Registered Representative, KMS Financial Services, Inc.

PROFESSIONAL DESIGNATIONS

CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with a flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (CFP Board).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

While there may be a variance in credential requirements from 1994 when Mr. Hamilton was originally awarded the CFP® certification, currently to attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined are necessary for the competent and professional delivery of financial planning services, and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;

- Experience – (1) Complete at least three years (at least 6,000 hours) of full-time financial planning-related experience or (2) complete at least two years (at least 4,000 hours) of full-time financial planning-related experience while under the supervision of a CFP® professional; and
- Ethics – Agree to be bound by the CFP Board’s *Code of Ethics and Standards of Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Code of Ethics and Standards of Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

An **ENROLLED AGENT** is a tax professional authorized by the United States Government to represent taxpayers in matters concerning the Internal Revenue Service (IRS). Enrolled agents must undergo a background check and either pass an examination proving competence or have sufficient experience as an IRS employee. Additional information related to this designation can be obtained from the issuing institution and your investment advisor representative.

CERTIFIED DIVORCE FINANCIAL ANALYST™, C DFA® is a designation issued by The Institute for Divorce Financial Analysts (IDFA™), a national organization dedicated to the certification, education and promotion of the use of financial professionals in the divorce arena. Founded in 1993, IDFA provides specialized training to accounting, financial, and legal professionals in the field of pre-divorce financial planning. C DFA® candidates learn how to help their clients with financial issues that will affect the rest of their lives, including:

- Separate vs. marital property
- Valuing and dividing property
- Debt, credit, and bankruptcy
- Retirement assets and pensions
- Spousal and child support
- Options for the matrimonial home
- Tax problems and solutions
- Tax problems and solutions

Prerequisites include a minimum of three years’ experience in the financial services, accounting, or family law, and current employment in one of those professions.

To earn the designation, the participant must complete a series of self-study course modules (regarding fundamentals of divorce, financial and tax issues of divorce, and case studies), pass an exam for each module, and be in good standing with their licensing or regulatory agency.

To retain the CDFA® designation and remain in good standing, designees must obtain 15-divorce-related hours of continuing education every two years and pay a reinstatement fee. Designees must also adhere to the CDFA® Code of Ethics and Professional Responsibility as well as self-disclosure requirements.

Item 3 – Disciplinary Information

Mr. Hamilton has never been subject to any legal or disciplinary proceedings which would be considered material (or otherwise) to a Client's evaluation of him or any of the services WBH Financial Services, LLC provides.

Item 4 – Other Business Activities

Mr. Hamilton is licensed to sell insurance products in one or more states. However, he does not offer or sell insurance products and does not receive commissions. Mr. Hamilton only holds that insurance license in order to provide advice and counsel on insurance products in connection with providing clients financial planning and investment advisory services.

Mr. Hamilton is a director and sole shareholder of Women Transitions Co., an Oregon nonprofit entity that provides financial and other assistance to recently divorced, separated, or windowed women.

Mr. Hamilton is an Investment Advisor Representative, Principal, and sole member of WBH Financial Services, LLC. He also provides tax preparation and consultation as a separate service for a fixed fee.

Item 5 – Additional Compensation

Apart from those activities listed in Item 4 above, Mr. Hamilton does not receive additional compensation from any third parties for providing advisory services to Clients of WBH.

Item 6 – Supervision

Mr. Hamilton is responsible for the services and advice provided to Clients of WBH Financial Services, LLC. He is responsible for investment policies, forms and procedures for firm Clients. Mr. Hamilton acts as Chief Compliance Officer and supervises the day to day operations and is responsible for the management of the firm.

Item 7 – Requirements for State-Registered Advisors

Mr. Hamilton has never been subject to an award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, or in a civil, self-regulatory organization or administrative proceeding in any of the following: (a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices. Mr. Hamilton has never been the subject of a bankruptcy petition.