

Item 1 - Cover Page

PILLAR WEALTH MANAGEMENT CO.

FORM ADV – PART 2A INFORMATION
February 11, 2020

Pillar Wealth Management Co.
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This Brochure provides information about the qualifications and business practices of Pillar Wealth Management Co. (“PWM”). If you have any questions about the contents of this Brochure, please contact PWM at (608) 833-9100. 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 PWM (CRD No. 118225), including a copy of PWM’s Form ADV Part 1, is available on the SEC’s website at www.adviserinfo.sec.gov.

PWM is a registered investment adviser. Registration of an investment adviser does not imply any certain level of skill or training.

Item 2 - Material Changes To This Brochure Since PWM's Last Annual Update filed March 28, 2019

The following material change(s) has been incorporated in the brochure since the last annual updating amendment noted above:

- None

You may request a complete copy of PWM's current Form ADV, Part 2A Brochure at any time by contacting PWM at 608.833.9100.

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Item 4 - Advisory Business

Pillar Wealth Management Co. (“PWM”) has been providing investment advice since January 2002. PWM provides investment management and educational services to a variety of clients. PWM is owned by William J. Meland and Patrick R. Sturm, and does not control any other firm.

The advisory services of PWM are described in detail below.

Investment Management Services

PWM provides investment management services to clients wishing to have their investments managed continuously on a discretionary basis. PWM is available to provide investment management services to a wide variety of clients including, but not limited to, individuals, trusts, pension and profit-sharing plans, corporations, estates and other entities.

The firm’s investment management services begin by PWM assisting each new client in determining the client’s investment objectives. PWM then manages each client’s investments in a manner consistent with their objectives. PWM also assists the client in establishing a securities account at a brokerage firm designated by the client, then invests and reinvests the client’s funds and securities held in the account. PWM’s investment advisory representatives (“Representatives”) usually recommend clients establish a brokerage account with Charles Schwab & Co., Inc. (“CS&Co”), a broker-dealer and member of SIPC, and most clients typically do so. CS&Co services include acting as custodian for each client’s managed securities and other assets, and as processor of the securities transactions placed by PWM portfolio managers.

Besides managing various types of securities for clients, including, but not limited to mutual funds, exchange-traded funds (“ETFs”), common and preferred stocks, corporate bonds, municipal securities and government bonds, a portion of the securities in client accounts may be held in cash or cash equivalents, including money market mutual funds. PWM may also on occasion advise that the client place a portion of their account with an unaffiliated, third-party investment manager (each, a “Third-Party Manager”). PWM uses a due diligence process to evaluate Third-Party Managers that PWM believes are qualified to meet client investment objectives. Clients will enter into agreements with Third-Party Managers directly, in which case clients will grant PWM the authority to retain or terminate the Third-Party Manager on the client’s behalf. Each Third-Party Manager has an obligation to provide clients with a copy of its current firm brochure describing, among other items, the Third-Party Manager’s investment strategies and techniques, as required by applicable federal or state securities laws. In the event a Third-Party Manager is used for a client’s account, in addition to PWM’s fees for investment advisory services, described under *Item 5*, below, the client will also be responsible for similar fees charged by the Third-Party Manager on the account assets managed by it.

PWM portfolio managers are inclined to use fundamental analysis when evaluating client securities and making purchases and sales based upon the results of their analysis. A manager may also consider technical market factors before deciding the appropriate action to take in a client’s account. Advice given to any client may differ from advice given, or the timing and nature of the action taken, with respect to other client accounts. PWM will make a reasonable effort to follow all investment management restrictions and instructions provided in writing to PWM by a client.

As a general rule, PWM believes investing in capital markets is best suited to those with a long-term time horizon and perspective. Therefore, clients should not expect frequent investment changes in the portfolio. However, as a result of monitoring the account, investment purchases and sales will be made, including asset-class-rebalance-related and tax-related trading.

PWM neither assures nor guarantees the results of PWM's Investment Management Services; thus, losses can occur from following PWM's advice pertaining to any investment or investment approach, including using conservative investment strategies.

Online Investment Management Services

PWM may provide online investment management services through Institutional Intelligent Portfolios™ (the "IIP"), an automated online investment management platform made available to independent investment advisors and sponsored by Schwab Performance Technologies, Inc. ("SPT"). Through IIP, PWM offer clients a range of investment strategies PWM has constructed and manages each consisting of a portfolio of ETFs and a cash allocation. Clients may instruct PWM to exclude up to three ETFs from their portfolio. The client's portfolio is held in a brokerage account opened by the client with SPT's affiliate, CS&Co. PWM is independent of and not owned by, affiliated with, or sponsored or supervised by SPT, CS&Co or their affiliates (together, "Schwab"). IIP is described in the SPT Institutional Intelligent Portfolios™ Disclosure Brochure (the "IIP Brochure"), which is delivered to clients by SPT during the online enrollment process.

PWM, not Schwab, is the client's investment adviser and primary point of contact with respect to IIP. PWM is solely responsible for determining the appropriateness of IIP for clients, choosing a suitable investment strategy and portfolio for each client's investment needs and goals, and managing that portfolio on an ongoing basis. SPT's role is limited to delivering the IIP Brochure to clients and administering IIP so that SPT operates as described in the IIP Brochure.

PWM has contracted with SPT to provide PWM with the technology platform and related trading and account management services for IIP. This platform enables PWM to make IIP available to clients online and includes a system that automates certain key parts of our investment process (the "System"). The System includes an online questionnaire that helps PWM determine the client's investment objectives and risk tolerance, and select an appropriate investment strategy and portfolio. Clients should note that PWM will recommend a portfolio via the System in response to the client's answers to the online questionnaire. The client may then indicate an interest in a portfolio that is one level less or more conservative or aggressive than the recommended portfolio, but PWM then makes the final decision and selects a portfolio based on all information PWM has about the client. The System also includes an automated investment engine through which PWM manages the client's portfolio on an ongoing basis through automatic rebalancing and tax-loss harvesting (if the client is eligible and elects).

PWM does not receive a portion of a wrap fee for PWM's services to clients through IIP. Clients do not pay fees directly to SPT in connection with IIP, but PWM does charge clients a fee for PWM's services as described below under *Item 5*. PWM pays SPT an annual fee of 0.10% (10 basis points) on the value of PWM's client assets in IIP unless PWM maintains \$100 million in client assets in accounts not in IIP at CS&Co. This fee arrangement gives PWM an incentive to recommend or require that PWM's clients with accounts not enrolled in IIP be maintained with CS&Co.

PWM's clients within IIP are managed using similar strategies as described above for our Investment Management Service.

Retirement Plan Participant Educational Services

PWM provides non-fiduciary services to retirement plans under a three-party agreement between the retirement plan, PWM and a third-party investment adviser. PWM does not act as a fiduciary to the plan. The third-party investment adviser is a fiduciary to the plan. PWM only performs the following non-fiduciary services as described below:

- (i) Assist in enrollment meetings designed to increase retirement plan participation among employees and to improve investment and financial understanding by the employees.
- (ii) Assist in the education of the participants in the plan about general investment principles and the investment alternatives available under the plan. Client understands that PWM's assistance in participant investment education shall be consistent with and within the scope of Department of Labor Interpretive Bulletin 96-1 (i.e., the definition of investment education). As such, PWM is not providing "fiduciary advice", as defined in the Employee Retirement Income Security Act of 1974, as amended ("ERISA"), to the participants. PWM will not provide investment advice concerning the prudence of any investment option nor will PWM provide a combination of investment options for a particular participant or beneficiary under the plan.
- (iii) Assist in the education of the participants regarding asset allocation by providing models for hypothetical individuals with different time horizons and risk profiles, as examples. Any asset allocation models will be published and made available to all plan participants, and no models are developed nor communicated specific to a particular plan participant.

PWM may, under separate agreement with an individual plan participant, provide individualized investment advice, if requested.

Assets Under Management

As of December 31, 2019, PWM had assets of \$110,391,601 under discretionary management and \$0 under non-discretionary management.

Item 5 - Fees and Compensation

Fees paid to PWM are for PWM advisory services only. The fees do not include, for example, the fees charged by third parties such as Third-Party Managers, or accountants and attorneys assisting with providing the client with accounting and legal advice, or trust company officers and trust company representatives. Commissions on brokerage transactions and other account fees, if any, will also be charged by brokerage firms in accordance with the brokerage firm's normal commission schedule. See *Item 12, Brokerage Practices*. Customary commissions on insurance are also not included.

Prospective clients should be aware that in addition to PWM's advisory fees, each ETF and each mutual fund in which a client's assets are invested also pays its own advisory fees and other internal expenses which already have been deducted from the fund's reported performance. Depending on the fund, a client may be able to invest directly in the shares issued by the fund with or without incurring any sales or third-party management fees. Account maintenance fees, if any, are also deducted by the custodian for each client's account. In addition, there may be tax effects pertaining to fund share redemptions, and other sales, made by PWM on behalf of clients. Redemptions and sales may be taxable events, which may accelerate the recognition of capital gains, and losses, and frequent redemptions and sales may result in short-term, rather than long-term, capital gains and losses, and short-term trading fees.

Investment Management Services Fee

Fees charged by PWM for investment management services are based upon the value of the account. All fees may be negotiated but generally conform with the following fee schedule:

<u>Value of Account Assets</u>	<u>Annual Fee</u>	<u>Three-Month Fee</u>
First \$1,000,000	1.50%	.375%
\$1,000,001 - \$2,000,000	1.20%	.300%
\$2,000,001 - \$3,000,000	1.00%	.250%
All Assets Over \$3,000,000	0.80%	.200%

Fees charged by PWM may be negotiated and thus vary from client to client for similar services. Negotiated fees are based upon a number of factors, including but not limited to, the type of account, the size of the account, the projected nature of trading for the account, the number and range of supplemental advisory services, the client-related services to be provided by PWM portfolio managers and in some cases, the fee charged by previous investment managers.

Fees are billed in advance on a three-month service period basis, at a rate of one-quarter of the annual asset-based fee. Fee calculations are based upon the market value of the account as of the last business day of the prior billing period. For purposes of valuing account assets, the following and other related accounts may be combined and the net fee due from each account apportioned, as agreed to by PWM and the client, among the accounts so combined: separate accounts of an individual; his or her spouse and close relatives of each; their minor children; trusts established on behalf of any of them; and any corporation, partnership, association or similar organized group in which any of the foregoing hold a controlling interest. Personal accounts of adult children will not be combined with those of their parent(s) unless these accounts are for an adult child that lacks the legal capacity to enter into their own discretionary advisory services agreement with PWM and the parent(s) are trustee(s) on said account(s). The fee for any period which is less than a full quarter is prorated. No adjustment or refund will be made with respect to partial account asset contributions and withdrawals by a client during any fee period.

The discretionary advisory services agreement between a client and PWM can be terminated by either party with five business days' advance written notice. Pre-paid fees will be refunded in the event the agreement is terminated before fees are earned.

Online Investment Management Service Fees

Fees charged by PWM for online investment management services through IIP are based upon the value of the account under management. The fees generally conform with the following fee schedule:

<u>Value of Account Assets</u>	<u>Annual Fee</u>	<u>Three-Month Fee</u>
First \$1,000,000	1.50%	.375%
\$1,000,001 - \$2,000,000	1.20%	.300%
\$2,000,001 - \$3,000,000	1.00%	.250%
All Assets Over \$3,000,000	0.80%	.200%

Fees charged by PWM may be negotiated and thus vary from client to client for similar services. Negotiated fees are based upon a number of factors, including but not limited to, the type of account, the size of the account, the projected nature of trading for the account, the number and range of supplemental advisory services, the client-related services to be provided by PWM portfolio managers and in some cases, the fee charged by previous investment managers.

Fees are billed in advance on a three-month service period basis, at a rate of one-quarter of the annual asset-based fee. Fee calculations are based upon the market value of the account as of the last business day of the prior billing period. For purposes of valuing account assets, the following and other related accounts may be combined and the net fee due from each account apportioned, as agreed to by PWM and the client, among the accounts so combined: separate accounts of an individual; his or her spouse and close relatives of each; their minor children; trusts established on behalf of any of them; and any corporation, partnership, association or similar organized group in which any of the foregoing hold a controlling interest. Personal accounts of adult children will not be combined with those of their parent(s) unless these accounts are for an adult child that lacks the legal capacity to enter into their own discretionary advisory services agreement with PWM and the parent(s) are trustee(s) on said account(s). The fee for any period which is less than a full quarter is prorated. No adjustment or refund will be made with respect to partial account asset contributions and withdrawals by a client during any fee period.

The discretionary advisory services agreement between a client and PWM can be terminated by either party with five business days' advance written notice. Pre-paid fees will be refunded in the event the agreement is terminated before fees are earned.

As described in *Item 4*, clients do not pay fees to SPT or brokerage commissions or other fees to CS&Co as part of IIP. Schwab does receive other revenues in connection with IIP, as described in the IIP Brochure. Brokerage arrangements are further described below in *Item 12*.

Retirement Plan Participant Educational Services

PWM's fees for retirement plan participant educational services are calculated as a percentage of total market value of plan assets under management by the third-party adviser. The third-party adviser's fee is based on the market value of assets in the client's retirement plan, subject to a minimum fee. PWM typically receives up to 65 basis points of the fee paid to the third-party adviser. The fee is paid quarterly, in arrears, within thirty (30) days following the third-party adviser's receipt of its fee. If the effective date or termination of an agreement is not the beginning of a calendar quarter, the quarterly fee is prorated based on the length of time the agreement is in effect.

PWM may act as investment manager to an individual retirement plan participant within a given retirement plan and earn an asset-based advisory fee from those individuals, by separate agreement with them, for providing investment management services.

Other Compensation

A number of PWM Representatives are also licensed to offer insurance products. PWM Representatives will receive customary commissions for the sale of such products should a client decide to make purchases through a PWM Representative. Clients are free to purchase such products other than through PWM Representatives. This compensation creates a conflict of interest. All prospective and existing clients are hereby advised that this conflict exists. In addition, PWM Representatives may recommend either no-load or load-waived mutual funds for a client's account. Clients are not charged a front-end load on load-waived mutual funds purchased for their accounts. In all cases, the investments must be suitable. Advisory fees are not reduced by the amount of sales compensation a PWM Representative receives, but PWM Representatives may consider commissions as a factor when determining asset-based fees.

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

PWM does not charge any performance-based fees, which are fees based on a share of capital gains or capital appreciation of client assets. All fees are disclosed above.

Item 7 - Types of Clients/Minimum Account Size

PWM makes advisory services available to a wide variety of clients including but not limited to, individuals, trusts, pension and profit-sharing plans, corporations, estates and other entities. While PWM does not charge a minimum fee for advisory services, certain legacy client contracts allow for a minimum fee to be charged.

Clients eligible to enroll in IIP include individuals, IRAs and revocable living trusts. Clients that are organizations (such as corporations and partnerships) or government entities, and clients that are subject to ERISA, are not eligible for IIP. The minimum investment required to open an account through IIP is \$5,000. The IIP Brochure describes related minimum required account balances for maintenance of the account, automatic rebalancing, and tax-loss harvesting.

Disputes involving PWM and a client are subject to settlement by arbitration before a dispute resolution organization.

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

PWM's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon historical and projected financial performance) and technical analysis (examining technical moves in the price of a security based upon peer securities or comparisons to an investment sector or index). PWM's main sources of information include, but are not limited to, financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, public filings and company press releases.

PWM does not guarantee the results of the advice given. Thus, significant losses can occur by investing in any security, or by following any strategy, including those recommended or applied by PWM. Past performance does not guarantee future results, and there is no guarantee that a client's investment objectives will be achieved. Client accounts may be subject to the following risks:

Management Risk. When PWM has investment discretion over a client's account, this means that PWM has been delegated the authority to buy and sell investments on the client's behalf. Accordingly, the client must rely upon PWM's abilities and judgment and upon its investment abilities. There is no guarantee that the Adviser's investment techniques will be successful.

Third-Party Managers Risk. Third-Party Managers may invest in a variety of investments and employ various investment techniques. Please refer to the Form ADV brochure of each Third-Party Manager for more information about its investment strategies and related risks.

Mutual Funds Risk. Mutual funds are subject to investment advisory, transactional, operating and other expenses. Each mutual fund is subject to specific risks, depending on its investments. The value of a mutual fund's investments and the net asset value of the mutual fund's shares will fluctuate in response to changes in market and economic conditions, as well as the financial condition and prospects of companies in which the mutual fund invests. The performance of each mutual fund will depend on whether the mutual fund's investment adviser is successful in pursuing the mutual fund's investment strategy.

ETFs Risk. An investment in an ETF generally presents the same primary risks as an investment in a conventional mutual fund (i.e., one that is not exchange traded) that has the same investment objective, strategies and policies. The price of an ETF can fluctuate within a wide range and a portfolio could lose money investing in an ETF if the prices of the underlying investments owned by the ETF go down. Like mutual funds, ETFs are subject to investment advisory, transactional, operating and other expenses.

Unlike mutual funds, ETFs do not necessarily trade at the net asset values of their underlying securities, which means an ETF could potentially trade above or below the value of its underlying portfolio. Additionally, because ETFs trade like stocks on exchanges, they are subject to trading and commission costs, unlike open-end mutual funds. ETFs are subject to liquidity risk. Liquidity risk exists when particular investments are difficult to purchase or sell, possibly preventing the sale of the security at an advantageous time or price.

Cybersecurity Risk. The computer systems, networks and devices used by PWM and its service providers employ a variety of protections designed to prevent damage or interruption from computer viruses, network and computer failures and cyberattacks. Despite such protections, systems, networks and devices potentially can be breached. Cyberattacks include, but are not limited to, gaining unauthorized access to digital systems for purposes of corrupting data, or causing operational disruption, as well as denial-of-service attacks on websites. Cyber incidents may cause disruptions and impact business operations, potentially resulting in financial losses, the inability of PWM or service providers to trade, violations of privacy and other laws, regulatory fines, reputational damage, reimbursement costs and additional compliance costs, as well as the inadvertent release of confidential information.

The IIP Brochure includes a discussion of various risks associated with IIP, including the risks of investing in ETFs, as well as risks related to the underlying securities in which ETFs invest. In addition, the IIP Brochure also discusses market/systemic risks, asset allocation/strategy/diversification risks, investment strategy risks, trading/liquidity risks, and large investment risks.

Item 9 - Disciplinary Information

PWM does not have any disciplinary information to report regarding itself or any of PWM's Representatives or other related persons.

Item 10 - Other Financial Industry Activities and Affiliations

Representatives of PWM may also be licensed insurance agents for various insurance companies.

William J. Meland and Patrick R. Sturm own Pillar Insurance Marketing, LLC, and Chester "Skip" Lee owns Platinum Financial Resources, Inc. through which insurance sales and services are offered.

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

When PWM Representatives make recommendations for the purchase of insurance products, they receive customary commissions as insurance salespersons. The receipt of commissions in return for insurance product purchases creates a conflict of interest for Representatives when they recommend the purchase of such products to clients.

PWM and PWM's employees may buy and sell securities that they recommend to clients for purchase or sale. PWM and PWM's employees will process transactions for client accounts ahead of similar transactions contemplated for their own accounts. To ensure employee transactions are supervised, each PWM employee is required to provide PWM's Chief Compliance Officer with access to their personal securities accounts for review. In addition, PWM has established written policies and procedures designed to prevent and detect questionable activity.

Item 12 - Brokerage Practices

Brokerage Discretion

In connection with PWM's investment management services, PWM does not exercise discretion to select a broker-dealer for securities transactions. That decision is left to the client. However, because PWM Representatives recommend, and clients typically designate, CS&Co to execute securities transactions recommended by PWM, PWM typically will not exercise discretion to evaluate the services of other broker-dealers. The selection by a client of one broker-dealer for executing orders – commonly referred to as “directed brokerage” – does not allow PWM to exercise discretion in evaluating the quality of execution services and commissions of other broker-dealers. Thus, selecting a single broker-dealer may not necessarily result in best price or execution of a client's transactions, and may end up costing clients more money.

In addition to the foregoing, Clients participating in the online management service through IIP are required to use CS&Co as custodian. The client opens such accounts directly with CS&Co. As described in the IIP Brochure, SPT may aggregate purchase and sale orders for ETFs across accounts enrolled in IIP, including both accounts for PWM clients and accounts for clients of other independent investment advisory firms using IIP. Similar to directed brokerage arrangements described above, the requirement to use SPT for all brokerage transactions in the IIP program may end up costing clients more money than if PWM were allowed to allocate brokerage among a variety of broker-dealers.

You should note that not all investment advisers require clients to direct brokerage.

Benefits to PWM from CS&Co

While PWM does not use client brokerage commissions to pay for research or other products or services received by PWM from CS&Co in connection with client securities transactions – commonly referred to as “soft dollar benefits” – PWM does receive access to information and other benefits (some of which may include research), described below, from CS&Co.

- Schwab Advisor Services (formerly called Schwab Institutional) is Schwab's business serving independent investment advisory firms like PWM. Through Schwab Advisor Services, CS&Co provides PWM and PWM's clients, both those enrolled in IIP and clients not enrolled in IIP, with access to CS&Co institutional brokerage services – trading, custody, reporting and related services – many of which are not typically available to CS&Co retail customers. CS&Co also makes available various support services, some of which help PWM manage or administer PWM's clients' accounts while others help PWM manage and grow our business. CS&Co's support services described below are generally available on an unsolicited basis (PWM does not have to request them) and at no charge to PWM. The availability to PWM of CS&Co's products and services is not based on PWM giving particular investment advice.
- CS&Co's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which PWM might not otherwise have access or that would require a significantly higher minimum initial investment by PWM's clients. CS&Co's services described in this paragraph generally benefit the client and the client's account(s).
- CS&Co also makes available to PWM other products and services that benefit PWM but may not directly benefit clients. These products and services assist PWM in managing and administering PWM's clients' accounts. They include investment research, both Schwab's own and that of

third parties, software and technology that provides access to client account data (such as duplicate trade confirmations and account statements), facilitate trade execution and allocate aggregated trades, provide pricing and other market data, facilitate payment of our fees from our clients' accounts, and assist with back office functions, recordkeeping and client reporting.

- CS&Co also offers other services intended to help PWM manage and further develop our business enterprise. These services include: education conferences and events, technology, compliance, legal and business consulting, publications and conferences on practice management and business succession and access to employee benefits providers, human capital consultants and insurance providers. CS&Co may provide some of these services itself. In other cases, CS&Co will arrange for third-party vendors to provide the services to PWM. CS&Co may also discount or waive its fees for some of these services or pay all or a part of a third-party's fees. CS&Co also provides PWM with other benefits such as occasional business entertainment of our personnel.

The services and other benefits received by PWM from CS&Co described above do not depend on the amount of brokerage transactions directed to CS&Co. However, PWM's receipt of these services and other benefits at minimal or no cost creates an inducement and conflict of interest for PWM since referring clients to any other brokerage firm could result in fewer support services and higher overhead costs to PWM. Thus, the receipt of these services creates an incentive and conflict of interest for PWM when PWM recommends CS&Co to clients. Nevertheless, it is PWM's belief that use of the CS&Co as custodian and broker is in its clients' best interest based on the scope, quality and price of CS&Co's services.

PWM does not process transactions through CS&Co in return for CS&Co referring new clients to PWM.

Item 13 - Review of Accounts and Reports

Managed accounts are reviewed as frequently as requested by client or as deemed necessary by PWM as a result of the nature of securities in an account, events affecting assets in an account or other reasons. PWM's portfolio manager assigned to a client's account conducts all reviews.

Each client receives quarterly account statements directly from the client's custodian.

Item 14 - Client Referrals and Other Compensation

PWM does not compensate any unrelated, third parties for client referrals, nor does PWM accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them. Also, as indicated above, PWM does not direct brokerage transactions to any third party, including Schwab, in return for client referrals. However, PWM does provide incentive compensation to one of PWM's Representatives for bringing new clients to PWM. Such payments, which are made in compliance with applicable securities laws, are made at PWM's expense and do not result in any additional fee to advisory clients.

In addition, PWM receives an economic benefit from Schwab in the form of the support products and services Schwab makes available to PWM. These products and services, how they benefit PWM, and the related conflicts of interest are described above under *Item 12*.

Item 15 - Custody

PWM does not act as custodian for client accounts. All clients must appoint a custodian, such as a broker, bank or trust company, to have possession of the assets of the account, to settle transactions for the account, and to accept instructions from PWM regarding assets in the account, subject to certain procedural restrictions. Clients receive quarterly account statements directly from the custodian. Please compare the information in any client reports and/or billing statements prepared by PWM with the information in account statements provided by the custodian.

To the extent PWM is deemed to have custody as a result of a client authorizing PWM to deduct advisory fees directly from the client's custodial account, PWM intends to comply with the safekeeping requirements set forth in Rule 206(4)-2 under the Investment Advisers Act of 1940, as amended.

Item 16 - Investment Discretion

When providing investment management services, PWM Representatives may exercise discretion when granted authority by clients, and most clients grant discretionary authority to PWM. When doing so, discretionary authority allows PWM to select the securities to buy and sell, the amount to buy and sell, when to buy and sell, and the commission rate paid, without obtaining specific consent from the client for each trade. Clients should be aware that Representatives may make different recommendations and effect different trades with respect to the same securities to different advisory clients. Commissions and execution of securities transactions implemented through the custodian/broker-dealer recommended by PWM – i.e., CS&Co – may not be better than the commissions or execution available if the client used another brokerage firm. However, PWM believes that the overall level of services and support provided to the client by CS&Co outweighs the potentially lower costs that may be available from other brokerage service providers.

When a Third-Party Manager is used to manage a portion of a client's account, the Third-Party Manager, not PWM, exercises discretion to purchase or sell investments in the account managed by the Third-Party Manager.

If a client directs PWM to effect transactions through a particular broker-dealer other than CS&Co, depending on the circumstances, PWM will do so. However, such an instruction may have implications to the client which may include incurring transaction costs and commissions that may be higher or lower than if the instruction had not been given. Also, restricting PWM to a particular broker-dealer may limit PWM's ability to include a client account order within block orders to obtain the best price or execution. In addition, if PWM is effecting transactions in a security for clients by means of a block order with

CS&Co, as well as an order in the same security for a client who has directed PWM to use a different broker-dealer, PWM will effect the block order with CS&Co first. Thus, clients directing PWM to use a different broker-dealer may not receive the same average price for securities bought or sold that would be received if the order was part of a block order.

In those instances where an order error occurs by PWM, PWM's policy is to reverse the order to make the client account whole.

Item 17 - Voting Client Securities

PWM and PWM's Representatives do not vote proxies on behalf of clients. Rather, the obligation to vote all proxies rest with the client, who will receive notices of proxies from their account's custodian. Likewise, PWM also does not take any action on legal notices PWM or a client may receive from issuers of securities held in a client's managed account. However, PWM is available to answer questions regarding such notices.

As described in the IIP Brochure, clients enrolled in IIP designate SPT to vote proxies for the ETFs held in their accounts. PWM has directed SPT to process proxy votes and corporate actions through and in accordance with the policies and recommendations of a third-party proxy voting service provider retained by SPT for this purpose. Additional information about this arrangement is available in the IIP Brochure. Clients who do not wish to designate SPT to vote proxies may retain the ability to vote proxies themselves by signing a special CS&Co form.

Item 18 - Financial Information

PWM does not receive fees of more than \$1,200 six months or more in advance, thus no financial statement for PWM is attached. PWM does not have any financial condition that is reasonably likely to impair PWM's ability to meet contractual commitments to any client. PWM has not been the subject to a bankruptcy petition at any time during the past ten years.

Privacy Policy

FACTS	WHAT DOES PILLAR WEALTH MANAGEMENT CO. (“PWM”) DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires PWM to tell you how PWM collects, shares, and protects your personal information. Please read this notice carefully to understand what PWM does.	
What?	<p>The types of personal information PWM collects and shares depends on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and employment information • Income, net worth and investment experience • Risk tolerance and retirement assets <p>When you are no longer PWM’s customer, PWM continues to share your information as described in this notice.</p>	
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, PWM lists the reasons financial companies can share their customers’ personal information; the reasons PWM chooses to share; and whether you can limit this sharing.	
Reasons PWM can share your personal information	Does PWM share?	Can you limit this sharing?
For PWM’s everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For PWM’s marketing purposes— to offer PWM’s products and services to you	Yes	Yes
For joint marketing with other financial companies	Yes	Yes
For PWM’s affiliates’ everyday business purposes— information about your transactions and experiences	Yes	Yes
For PWM’s affiliates’ everyday business purposes— information about your creditworthiness	No	Yes
For PWM’s affiliates to market to you	Yes	Yes
For non-affiliates to market to you	Yes	Yes
*If your representative terminates his or her relationship with PWM and moves to another investment advisory firm, PWM or your independent representative may disclose your personal information to the new firm, unless you instruct PWM not to by returning the completed Privacy Choices Notice form attached to this notice.		
Questions?	Call 608-833-9100 or go to www.pillarwealth.com .	

Who PWM is

Who is providing this notice?	Pillar Wealth Management Co. (“PWM”)
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What PWM does

How does PWM protect my personal information?	To protect your personal information from unauthorized access and use, PWM uses security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. PWM restricts access to your personal information to those employees who need such access to perform their job responsibilities.
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How does PWM collect my personal information?	PWM collects your personal information, for example, when you <ul style="list-style-type: none">• enter into investment advisory contract• seek financial advice• apply for insurance PWM also collects your personal information from others, such as affiliates, or other companies.
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Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none">• sharing for affiliates' everyday business purposes—information about your creditworthiness• affiliates from using your information to market to you• sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
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Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies.
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Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none">• Non-affiliates PWM shares with can include companies such as vendors, and other service providers.
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Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you. Our joint marketing partners include categories of companies such as insurance companies.
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Other important information

Pillar Wealth Management Co. is a registered investment advisor.

If you want to limit PWM's sharing

Contact us

If you prefer that PWM not share your nonpublic personal information (except in those circumstances described previously that are permitted or required by law), please contact the Privacy Coordinator:

By telephone: 608-833-9100

By email: info@pillarwealth.com

By mail: Mark your choices below, fill in, and send the form to:

Pillar Wealth Management Co.
Privacy Coordinator
7633 Ganser Way, Suite 210
Madison, WI 53719

Unless PWM hears from you, PWM can begin sharing your information 30 days from the date of this letter. However, you can contact PWM at any time to limit PWM's sharing.

Check your choices

Your choices will apply to everyone on your account

Check any/all you want to limit:

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me. *(I will receive a renewal notice for this use for marketing in 5 years.)*
- Do not share my personal information with non-affiliates to market their products and services to me.

Your name

Your address

Account number

Mail to:

Pillar Wealth
Management Co.
Privacy Coordinator
7633 Ganser Way,
Suite 210
Madison, WI 53719

PILLAR WEALTH MANAGEMENT CO.

FORM ADV – SCHEDULE 2B SET

February 11, 2020

Pillar Wealth Management Co.
7633 Ganser Way, Suite 210
Madison, WI 53719

Phone (608) 833-9100 Fax (608) 833-9140
www.pillarwealth.com

Schedule 2B Brochure Supplements

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SCHEDULE 2B - BROCHURE SUPPLEMENT

William J. Meland

February 11, 2020

PILLAR WEALTH MANAGEMENT CO.

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Madison, WI 53719

Phone (608) 833-9100 Fax (608) 833-9140

www.pillarwealth.com

This Brochure Supplement provides information about William J. Meland that supplements the Pillar Wealth Management Co. (“PWM”) brochure. You should have received a copy of that brochure. Please contact PWM at 608-833-9100 if you did not receive PWM's brochure or if you have any questions about the contents of this supplement.

Additional information about William J. Meland (CRD No. 1514185) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Mr. Meland attended Madison Area Technical College from January 1984 until December 1985 when he received an Associate Degree in Finance. He previously attended the University of Wisconsin-Whitewater from August 1982 to December 1983. Mr. Meland was born in 1964. He is also licensed as an insurance agent in Wisconsin for life and health insurance. Since completing his education, Mr. Meland has been continually involved in the insurance and securities fields.

Mr. Meland serves as PWM's President and Chief Compliance Officer. He founded Pillar Wealth Management, LLC (predecessor of Pillar Wealth Management Co.) in November 2001. Prior to founding PWM, he was a Vice President and Financial Adviser for Strong Capital Management, Inc. where he provided counseling and securities services to high-net-worth individuals.

Mr. Meland has successfully passed the FINRA Series 66 Uniform Combined State Law Exam.

Item 3 - Disciplinary Information

Mr. Meland does not have any disciplinary information to disclose. He has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority, or (c) been party to a self-regulatory proceeding.

Item 4 - Other Business Activities

Mr. Meland is also licensed to sell insurance products through various insurance companies. He spends approximately 45% of his time on this activity.

Item 5 - Additional Compensation

Mr. Meland receives commissions for the sale of insurance products. He does not receive any additional economic benefit from third parties for providing advisory services.

Item 6 - Supervision

Mr. Meland is the Chief Compliance Officer for PWM and is responsible for his own supervision as well as that of all PWM Representatives. Mr. Meland's contact information is available on the cover page of this Schedule 2B supplemental brochure.

Item 1 - Cover Page

SCHEDULE 2B - BROCHURE SUPPLEMENT

Brian J. Clevon
February 11, 2020

PILLAR WEALTH MANAGEMENT CO.
7633 Ganser Way, Suite 210
Madison, WI 53719

Phone (608) 833-9100 Fax (608) 833-9140
www.pillarwealth.com

This Brochure Supplement provides information about Brian J. Clevon that supplements the Pillar Wealth Management Co. (“PWM”) brochure. You should have received a copy of that brochure. Please contact PWM at 608-833-9100 if you did not receive PWM's brochure or if you have any questions about the contents of this supplement.

Additional information about Brian J. Clevon (CRD No. 4188820) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Mr. Cleven attended the Kellogg School of Management at Northwestern University in Evanston, IL from September 1997 until June 1999 receiving a Master of Business Administration. He attended the University of Wisconsin-Platteville from August 1982 to December 1986 where he earned a Bachelor of Science in Electrical Engineering (BSEE). Mr. Cleven is a licensed Professional Engineer (PE). He was born in 1963.

Mr. Cleven serves as PWM's Chief Executive Officer (CEO). He joined PWM in 2011 as an investment adviser representative. From September 2001 to March 2011, Mr. Cleven held the positions of Vice President and Managing Director of Madison Investment Advisors, Inc. in Madison, WI. Prior to that, he was a Vice President and Financial Adviser for Strong Capital Management, Inc. where he provided investment counseling and securities services to high-net-worth individuals.

Mr. Cleven has successfully passed the FINRA Series 66 Uniform Combined State Law Exam.

Item 3 - Disciplinary Information

Mr. Cleven does not have any disciplinary information to disclose. He has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority, or (c) been party to a self-regulatory proceeding.

Item 4 - Other Business Activities

Mr. Cleven is not actively engaged in any other business activities.

Item 5 - Additional Compensation

Mr. Cleven does not receive any additional economic benefit from third parties for providing advisory services.

Item 6 - Supervision

Mr. Cleven is supervised by William J. Meland, PWM's Chief Compliance Officer. Mr. Meland's contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Meland and other individuals as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

Item 1 - Cover Page

SCHEDULE 2B - BROCHURE SUPPLEMENT

Chester "Skip" Lee

February 11, 2020

PILLAR WEALTH MANAGEMENT CO.

7633 Ganser Way, Suite 210

Madison, WI 53719

Phone (608) 833-9100 Fax (608) 833-9140

www.pillarwealth.com

118 North Iowa Street

Dodgeville, WI 53533

Phone (608) 935-7335 Fax (608) 319-2077

This Brochure Supplement provides information about Chester W. Lee that supplements the Pillar Wealth Management Co. ("PWM") brochure. You should have received a copy of that brochure. Please contact PWM at 608-833-9100 if you did not receive PWM's brochure or if you have any questions about the contents of this supplement.

Additional information about Chester W. Lee (CRD No. 2836975) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Mr. Lee attended the University of Wisconsin-Platteville from 1991-1994 where he studied Business Administration with an emphasis on Finance. He previously attended the University of Wisconsin-Richland in Richland Center, WI from 1989-1991 where he earned an Associate Degree in Science. Mr. Lee was born in 1971. He is also licensed as an insurance agent in Wisconsin for life insurance.

Mr. Lee joined PWM as an investment adviser representative in 2011. He founded Platinum Financial Resources, Inc. in 1994, which prior to joining PWM was doing business as (dba) Skip Lee & Associates, where he helped clients with their financial and estate planning. Mr. Lee was licensed with ING Financial Partners, Inc. from 2007 until 2011.

Mr. Lee has successfully passed the FINRA Series 65 Uniform Investment Adviser Law Exam.

Item 3 - Disciplinary Information

Mr. Lee does not have any disciplinary information to disclose. He has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority, or (c) been party to a self-regulatory proceeding.

Item 4 - Other Business Activities

Mr. Lee is also licensed to sell insurance products through various insurance companies. He spends approximately 25% of his time on this activity. Additionally, Mr. Lee owns a self-storage business called Store N Stuff Self Storage. He spends approximately 25% of his time on this activity.

Item 5 - Additional Compensation

Mr. Lee receives commissions for the sale of insurance products. In addition, he receives incentive compensation from PWM for bringing new clients to the firm. He does not, however, receive any additional economic benefit from third parties for providing advisory services.

Item 6 - Supervision

Mr. Lee is supervised by William J. Meland, PWM's Chief Compliance Officer. Mr. Meland's contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Meland and other individuals as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

Item 1 - Cover Page

SCHEDULE 2B - BROCHURE SUPPLEMENT

Patrick R. Sturm

February 11, 2020

PILLAR WEALTH MANAGEMENT CO.

7633 Ganser Way, Suite 210

Madison, WI 53719

Phone (608) 833-9100 Fax (608) 833-9140

www.pillarwealth.com

This Brochure Supplement provides information about Patrick R. Sturm that supplements the Pillar Wealth Management Co. (“PWM”) brochure. You should have received a copy of that brochure. Please contact PWM at 608-833-9100 if you did not receive PWM's brochure or if you have any questions about the contents of this supplement.

Additional information about Patrick R. Sturm (CRD No. 3072622) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Mr. Sturm earned a Bachelor of Science Degree in Finance from Marquette University in 1998. He also holds the designations of Certified Investment Management Analyst (CIMA®) and Certified Private Wealth Advisor (CPWA®). Mr. Sturm was born in 1976. He is also licensed as an insurance agent in Wisconsin for life insurance.

Mr. Sturm has held the position of Chief Operating Officer (COO) of PWM since 2017. He joined PWM in 2013 as Vice President, Principal. Mr. Sturm was an Associate Regional Director and then Regional Director for Russell Investments From 2006 until 2013. From 1998 to 2006, he was a Senior Financial Consultant for Strong Funds.

The Certified Investment Management Analyst (CIMA®) certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. Prerequisites for the CIMA certification are three years of financial services experience and an acceptable regulatory history. To obtain the CIMA certification, candidates must pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass a Certification Examination. CIMA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CIMA designees must report 40 hours of continuing education credits, including two ethics hours, every two years to maintain the certification. The designation is administered through Investment Management Consultants Association (IMCA).

The Certified Private Wealth Advisor (CPWA®) certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements. The CPWA certification is an advanced designation for advisors working with high-net-worth clients. Prerequisites for the CPWA certification are five years of financial services experience and an acceptable regulatory history. To obtain the CPWA certification, candidates must study such core topics as Ethics, Tax Planning, Portfolio Management, Behavior Finance, Planning for Executives, Planning for Closely Held Business Owners, Retirement Planning, Risk Management and Asset Protection, Charitable Planning, Estate Planning and Client Relationships, Family Dynamics and Legacy Planning, successfully complete a five day classroom education program provided by The University of Chicago Booth School of Business and pass a Certification Examination. CPWA designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks. CPWA designees also must report 40 hours of continuing education credits every two years. The designation is administered through Investment Management Consultants Association (IMCA).

Mr. Sturm has successfully passed the Series 66 Uniform Combined State Law Exam.

Item 3 - Disciplinary Information

Mr. Sturm does not have any disciplinary information to disclose. He has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority, or (c) been party to a self-regulatory proceeding.

Item 4 - Other Business Activities

Mr. Sturm is also licensed to sell insurance products through various insurance companies. He spends less than 5% of his time on this activity.

Item 5 - Additional Compensation

Mr. Sturm receives commissions for the sale of insurance products. He does not receive any additional economic benefit from third parties for providing advisory services.

Item 6 - Supervision

Mr. Sturm is supervised by William J. Meland, PWM's Chief Compliance Officer. Mr. Meland's contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Meland and other individuals as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

Item 1 - Cover Page

SCHEDULE 2B - BROCHURE SUPPLEMENT

Cara R. Wolenc

February 11, 2020

PILLAR WEALTH MANAGEMENT CO.

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Phone (608) 833-9100 Fax (608) 833-9140

www.pillarwealth.com

This Brochure Supplement provides information about Cara R. Wolenc that supplements the Pillar Wealth Management Co. (“PWM”) brochure. You should have received a copy of that brochure. Please contact PWM at 608-833-9100 if you did not receive PWM's brochure or if you have any questions about the contents of this supplement.

Additional information about Cara R. Wolenc (CRD No. 6180692) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Ms. Wolenec received a Bachelor of Science Degree in Accounting from Upper Iowa University in 2010. She has also earned the Certified Public Accountant (CPA) designation. Ms. Wolenec had previously attended Madison Area Technical College where she earned an Associate in Applied Science Degree in Accounting in 2007, completed a Medical Transcription Technical program in 1998 and received a Medical Assistant Technical Diploma in 1995. Ms. Wolenec was born in 1970.

Ms. Wolenec joined PWM in 2012 as Office Manager. From 2011 to 2012 she was an Accountant, and from 2010 to 2011 a Financial Specialist, for UW Madison School of Medicine and Public Health. Ms. Wolenec held an Accounts Payable position from 2008 to 2010, and from 1995 through 2008 worked as a Medical Transcriptionist, as well as a Certified Medical Assistant, with the UW Medical Foundation.

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting), minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA), and successful passage of the Uniform CPA Examination. In order to maintain a CPA license, states generally require the completion of 40 hours of continuing professional education (CPE) each year (or 80 hours over a two-year period or 120 hours over a three-year period). Additionally, all American Institute of Certified Public Accountants (AICPA) members are required to follow a rigorous *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any commission or referral fees, and serve the public interest when providing financial services. The vast majority of state boards of accountancy have adopted the AICPA's *Code of Professional Conduct* within their state accountancy laws or have created their own.

Ms. Wolenec has successfully passed the Series 65 Uniform Investment Adviser Law Exam.

Item 3 - Disciplinary Information

Ms. Wolenec does not have any disciplinary information to disclose. She has not: (a) been party to a criminal or civil action in a domestic, foreign or military court, (b) been party to an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory authority, or (c) been party to a self-regulatory proceeding.

Item 4 - Other Business Activities

Ms. Wolenec is not actively engaged in any other business activities.

Item 5 - Additional Compensation

Ms. Wolenec does not receive any additional economic benefit from third parties for providing advisory services.

Item 6 - Supervision

Ms. Wolenc is supervised by William J. Meland, PWM's Chief Compliance Officer. Mr. Meland's contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Meland and other individuals as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.