Wilde Capital Management, LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Wilde Capital Management, LLC. If you have any questions about the contents of this brochure, please contact us at (866) 894 5332 or by email at: dmwilde@wildecapitalmgmt.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Wilde Capital Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Wilde Capital Management, LLC's CRD number is: 281891.

60 Morris Turnpike
Summit, NJ, 07901
(866) 894-5332
https://wildecapitalmgmt.com
dmwilde@wildecapitalmgmt.com

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

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Wilde Capital Management, LLC on March 03, 2021 are described below. Material changes relate to Wilde Capital Management, LLC's policies, practices or conflicts of interests.

- Wilde Capital Management, LLC offers a performance-based portfolio management service (Item 4, 5, 6, and 19)
- Wilde Capital Management, LLC updated Investment Strategies (Item 8).

Item 3: Table of Contents

Item 4: Advisory Business

A. Description of the Advisory Firm

Wilde Capital Management, LLC (hereinafter "WCM-LLC") is a Limited Liability Company organized in the State of New Jersey.

The firm was formed in October 2015, and the principal owners are Douglas Meyer Wilde, and Mark Daniel Sloss.

B. Types of Advisory Services

Portfolio Management Services

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

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

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

WCM-LLC seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of WCM-LLC's economic, investment or other financial interests. To meet its fiduciary obligations, WCM-LLC attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, WCM-LLC's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is WCM-LLC's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Performance-Based Portfolio Management

WCM-LLC also offers their WCM – V Strategy, Global Total Return Investment Portfolio through TD Ameritrade, Charles Schwab and Folio.

Services Limited to Specific Types of Investments

WCM-LLC generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and non-U.S. securities. WCM-LLC may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

WCM-LLC offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels). Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent WCM-LLC from properly servicing the client account, or if the restrictions would require WCM-LLC to deviate from its standard suite of services, WCM-LLC reserves the right to end the relationship.

D. Wrap Fee Programs

WCM-LLC participates in wrap fee programs, which are investment programs where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. WCM-LLC manages the investments in the wrap fee program. Fees paid under the wrap fee program will be given to WCM-LLC as a management fee.

WCM-LLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

E. Assets Under Management

WCM-LLC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$34,392,312.00	$0.00	December 2020

Item 5: Fees and Compensation

A. Fee Schedule

Asset-Based Fees for Portfolio Management

Total Assets Under Management	Annual Fee
$0 - $100,000	2.00%
$100,001 - $700,000	1.75%
$700,001 - And Up	1.50%

These fees are generally negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of WCM-LLC's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 10 days' written notice.

WCM-LLC uses the value of the account as of the last business day of the prior billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Performance-Based Portfolio Management Fees

Qualified Clients will pay an annual fee of 1% of assets under management along with a 10% performance fee measured against the Hedge Fund Research HFRI Equity Hedge Total Return Index. If there is no excess return (outperformance vs the benchmark) there will be no performance fee.

In general, a "Qualified Client" is:

(1) a natural person or company who at the time of entering into such agreement has at least $1,000,000 under the management of the investment adviser;

(2) a natural person or company who the adviser reasonably believes at the time of entering into the contract: (A) has a net worth of jointly with his or her spouse of more than $2,100,000 excluding the value of the client's primary residence; or (B) is a qualified purchaser as defined in the Investment Company Act of 1940, §2(a)(51)(A) (15 U.S.C. 80a-2(51)(A)); or

(3) a natural person who at the time of entering into the contract is: (A) An executive officer, director, trustee, general partner, or person serving in similar capacity of the

investment adviser; or (B) An employee of the investment adviser (other than an employee performing solely clerical, secretarial, or administrative functions with regard to the investment adviser), who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar function or duties for or on behalf of another company for at least 12 months.

B. Payment of Fees

Payment of Asset-Based Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

Payment of Performance-Based Portfolio Management Fees

Performance-based fees are withdrawn directly from the client’s accounts with client’s written authorization. Annual fees are billed quarterly in advance and the performance fee is billed in arrears based on the previous quarter’s excess return.

C. Client Responsibility For Third Party Fees

WCM-LLC will wrap third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). WCM-LLC will charge clients one fee and pay all transaction fees using the fee collected from the client.

D. Prepayment of Fees

WCM-LLC collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client’s account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

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

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

WCM-LLC manages accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) as well as accounts that are NOT billed on performance-based fees. Managing both kinds of accounts at the same time presents a conflict of interest because WCM-LLC or its supervised persons have an incentive to favor accounts for which WCM-LLC and its supervised persons receive a performance-based fee. WCM-LLC addresses the conflicts by ensuring that clients are not systematically advantaged or disadvantaged due to the presence or absence of performance-based fees. WCM-LLC seeks best execution and upholds its fiduciary duty for all clients.

Clients that are paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

Item 7: Types of Clients

WCM-LLC generally provides advisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Insurance Companies
- Families
- Foundations
- Endowments
- Registered Investment Advisors
- Independent Brokers/Dealers
- Donor Advised Funds

Minimum Account Size

There is an account minimum of $5,000 which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

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

Charting analysis involves the use of patterns in performance charts. WCM-LLC uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

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

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

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

WCM-LLC uses long term trading and short term trading. We currently offer four strategies: Core, Disciplined Yield, ESG and V-Strategy.

The Core strategy is focused on delivering a combination of capital appreciation and investment income above global equity and bond markets over the course of a full investment cycle.

The Disciplined Yield strategy emphasizes total return through yield and stable dividend growth primarily through equity ETFs that provide exposure to the most consistent dividend growers.

The ESG strategy invests for total return with strong consideration for Environmental, Social and Governance factors as well as direct positive impact.

The V-Strategy is an unconstrained, high conviction investment strategy allocating capital across global capital markets with an investment objective of total return.

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

B. Material Risks Involved

Methods of Analysis

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

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

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

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

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

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

Investment Strategies

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

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

All four of our investment strategies (Core, Disciplined Yield, ESG and V-Strategy) are globally diversified across asset types and geographies and employ tactical asset allocation. Diversification and tactical management do not guarantee a profit nor protect against a loss in declining markets.

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

C. Risks of Specific Securities Utilized

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed "electronic shares" not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

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

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

Neither WCM-LLC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Douglas Meyer Wilde is a registered analyst with Cirrus Research, LLC, an independent investment research firm. His responsibilities include investment research and portfolio construction. He spends 10 hours a month during trading hours to this activity. 10% of total yearly compensation derives from this business.

Mark Daniel Sloss is a registered analyst with Cirrus Research, LLC, an independent investment research firm. His responsibilities include investment research and portfolio construction. He spends 10 hours a month during trading hours to this activity. 10% of total yearly compensation derives from this business.

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

WCM-LLC does not utilize nor select third-party investment advisers. All assets are managed by WCM-LLC management.

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

A. Code of Ethics

WCM-LLC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. WCM-LLC's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of WCM-LLC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of WCM-LLC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. WCM-LLC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client’s disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients’ Securities

From time to time, representatives of WCM-LLC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WCM-LLC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, WCM-LLC will never engage in trading that operates to the client’s disadvantage if representatives of WCM-LLC buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

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

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

WCM-LLC may require clients to use TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC or other preferred custodians.

1. *Research and Other Soft-Dollar Benefits*

While WCM-LLC has no formal soft dollars program in which soft dollars are used to pay for third party services, WCM-LLC may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). WCM-LLC may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and WCM-LLC does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. WCM-LLC benefits by not having to produce or pay for the research, products or services, and WCM-LLC will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that WCM-LLC's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. *Brokerage for Client Referrals*

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

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

WCM-LLC may require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

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

Item 13: Review of Accounts

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

All client accounts for WCM-LLC's advisory services provided on an ongoing basis are reviewed at least quarterly by Douglas M Wilde, CCO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at WCM-LLC are assigned to this reviewer.

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

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client of WCM-LLC's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. WCM-LLC will provide invoices concurrently with fee debits to client accounts.

Item 14: Client Referrals and Other Compensation

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

WCM-LLC does not receive any economic benefit, directly or indirectly from any third party for advice rendered to WCM-LLC's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

WCM-LLC may directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, WCM-LLC will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

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

Item 17: Voting Client Securities (Proxy Voting)

WCM-LLC will accept voting authority for client securities. If clients wish, they can receive proxies directly from the issuer of the security or the custodian. Clients should then direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

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

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

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

C. Bankruptcy Petitions in Previous Ten Years

WCM-LLC has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

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

WCM-LLC currently has only three management persons/executive officers: Douglas Meyer Wilde, and Mark Daniel Sloss. Education and business background can be found on the Form ADV Part 2B brochure supplement for each individual.

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

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

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

WCM-LLC accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client.

Qualified Clients will pay an annual fee of 1% of assets under management along with a 10% performance fee measured against the Hedge Fund Research HFRI Equity Hedge Total Return Index. If there is no excess return (outperformance vs the benchmark) there will be no performance fee.

Clients that are paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes.

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at WCM-LLC or WCM-LLC has been found liable in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

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

See Item 10.C and 11.B.