

ADV BROCHURE

This brochure provides information about Welhouse, and Associates, Inc. (“Welhouse, “We”, “Us”, the “firm”). With a few exceptions, "the brochure rule" requires that you must be given certain information about the investment advisor. This document includes at least the information contained in the US Securities Exchange Commission's investment advisor registration Form ADV Part II.

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1. SERVICES AND FEES

Welhouse, provides discretionary investment management and, as an ancillary function, comprehensive wealth management. Our core expertise is money management through top-down investment allocation. 95% of total advisory billings come from management and supervision of investment accounts. 5% of the firm's income comes from business clients for services not involving securities (business strategy, accounting, and consulting).

Fees are calculated as a percentage of assets under management. Accounts are charged in advance for a three-month period based on the account balances. We will debit your accounts for the appropriate fee. If you have more than one account, we may debit only one account for the combined total balance of all your accounts. For initial periods, the beginning balance and date range is described by the management contract.

We offer two contracts for individuals based on a percentage of assets under management: asset management and comprehensive wealth management that includes limited bill pay services, tax advice and preparation of tax returns. For business or other entity, a business service agreement, itemizes services for which we charge fixed fees. See each contract for fee schedule and further description of services and fees.

In addition to our standard fees, you may incur other charges from other parties for clearing, custody, independent investment management, advisory services or other services that may be provided on an hourly basis.

2. TYPES OF CLIENTS

We provide advisory services to individual clients and institutional clients such as pension or profit sharing plans, trusts, estates or charitable organizations and corporations.

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3. TYPES OF INVESTMENTS

We have access to the most comprehensive universe of investment vehicles in the marketplace:

- Equity Securities
- Warrants
- Corporate Debt Securities
- Certificates of Deposit
- Money Markets
- Municipal Securities
- Investment Company Securities
- United States Government Securities
- Options contracts
- Futures contracts
- Interest in Partnerships or Private Trusts

4. ANALYSIS, INFORMATION AND STRATEGY

We use many methods to analyze securities including: charting, fundamental, technical, and cyclical methods. The main sources of information are research material prepared by other firms, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission, company press releases, financial newspapers and magazines and direct conversations with business management.

We implement strategies usually using long-term purchases (securities held at least a year) and short-term purchases (securities sold within a year). Rarely, trading (securities sold within 30 days) is also used. However, short sales, margin transactions and options writing will only be utilized at your request or upon your permission.

To the extent practical, we will allocate investment opportunities among various clients, including you, on a basis that is, over time, fair and equitable to all clients. We may give advice and take action with respect to other clients that is different from the advice given, the timing, and nature of action taken with respect to your account.

5. STANDARDS

There are no general standards of education or business experience that we require of those involved in determining investment advice.

6. BACKGROUND

Mark Welhouse, ChFC, CLU, RHU, REBC born 1956, is a Principal of Welhouse, Mark holds the Chartered Financial Consultant, Chartered Life Underwriter, Registered Health Underwriter, and Registered Employee Benefits Counselor designation awarded by The American College. Owner of Welhouse & Associates, Inc.

7. OTHER BUSINESS ACTIVITIES

The firm is actively engaged in business other than providing investment management. As real estate or insurance agents, we may be compensated separately for our role in providing advice and in executing that advice on your behalf, although the activities may not be specifically separable.

The firm provides ongoing advice and supervision to the Valley Real Estate Trust, Appleton Land Company, LLC, Fox Valley Land Company, LLC, these are private investment vehicles. We are compensated separately for services. Investment in these private investment vehicles is not a condition for our management of your account, but if appropriate, you may be invited to participate in a private offering of these private investment vehicles. The private investment vehicles do not pay selling fees or commissions to us or to any party.

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8. AFFILIATIONS

We are not affiliated with any other company. We have no obligation to use a particular broker/dealer or vendor.

9. INTEREST IN TRANSACTIONS

At no time do we receive compensation from any party for the specific purchase or sale of securities. Welhouse does not conduct investment-banking activities or trade for its own account. We have adapted strict procedures to restrict the trading of employee's accounts to comply with NASD and SEC requirements.

We never take or maintain possession of assets in an account. We do not act as a principal, buying securities for ourselves or selling securities we own to any client. The firm is not a general partner in any partnership in which clients are solicited to invest.

10. CONDITIONS OF MANAGEMENT

We do not impose a minimum dollar value of assets or other condition for starting or maintaining an account, except for investment discretion. However, custodians, mutual funds, third party advisors, and other vendors may not accept accounts under a certain dollar amount.

11. REVIEW OF ACCOUNTS

On a monthly basis we review each of your accounts for adherence to our current strategy, and as necessary we execute changes in accounts. We will provide a monthly, consolidated statement summarizing your accounts and our current strategy. Furthermore, the account custodians transmit confirmations for transactions or a periodic statements for each period in which there is activity.

The nature and frequency of personal contact varies. We request to be informed of any changes in your financial condition. There are no restrictions on your ability to contact and consult with us.

12. INVESTMENT DISCRETION

Welhouse requires discretion over your account. A letter of limited trading authorization is signed to appoint Welhouse, as your attorney-in-fact for the purpose of supervising and directing your financial portfolios, specifically for all transactions, the securities to be bought or sold, the amount, the timing, the broker/dealer and the commissions. Furthermore, this discretion may include the power to establish and maintain accounts, effect transactions in or between accounts, complete and submit applications for insurance products and to engage brokerage, accounting or legal counsel for the purpose of obtaining advice or assistance.

In selecting the broker/dealer, we consider the available prices and rates of brokerage commission, execution capabilities, research and other services that are expected to enhance our general portfolio management capabilities without having to demonstrate that such factors are a direct benefit to your accounts.

We have no obligation to supervise or direct investments that are in accounts that are not established or maintained by us through limited power of attorney and that are not charged Welhouse, management fees.

13. ADDITIONAL COMPENSATION

We never receive cash or other economic benefit including commissions, equipment and non-research services from a non-client in connection with providing investment management. We have not, but may in the future, compensate people or firms for providing referrals.