

Wilkinson Financial LLC

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This Brochure provides information about the qualifications and business practices of Wilkinson Financial LLC. If you have any questions about the contents of this Brochure, please contact us at (808) 782-6761 or via email at samuel@wilkinsonfinancial.com. 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.

Wilkinson Financial LLC ("Wilkinson Financial") is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them. Additional information about Wilkinson Financial is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Since our last filing in March 25, 2015, we have made the following material change to our Form ADV Part 2:

- A new Investment Adviser Representative, Chase Thomas joined Wilkinson Financial in July 2015. Information regarding Chase Thomas, can be found under the ADV Part 2B Brochure Supplement – Chase Thomas.

We have made the following non-material change to our Form ADV Part 2:

- We have updated the Form ADV Part 2A Item 4 to reflect that as of December 31, 2015, we managed assets of \$8,270,116.

In addition, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year which is December 31st. We will provide other ongoing disclosure information about material changes as necessary. We will also provide you with a new Brochure, as necessary, based on changes or new information. Currently, our Brochure may be requested at any time, without charge, by contacting Samuel Wilkinson at (808) 782-6761.

Additional information about Wilkinson Financial is also available via the SEC's website www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for Wilkinson Financial is 169501. The SEC's web site also provides information about any persons affiliated with Wilkinson Financial who are registered, or are required to be registered, as Investment Adviser Representatives of Wilkinson Financial.

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Item 4 – Advisory Business Introduction

Wilkinson Financial is a Registered Investment Adviser (“Adviser”) which offers investment advice, securities, and insurance to clients. We provide financial services to international clients and U.S. clients. We specialize in providing international clients with financial consulting and nondiscretionary asset management. We provide investment advice through Investment Adviser Representatives (“Advisor”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf. In addition, all advisors are required to have commensurate industry and educational experience.

Wilkinson Financial was founded in 2013 by Samuel Wilkinson who serves as a Managing Member and Chief Compliance Officer. We provide portfolio management services to individuals, high net worth individuals, trusts, estates, charitable organizations, foundations, endowments, corporations, and small businesses.

We provide U.S. and international clients with financial advice, consulting services, financial planning, and asset management services. We strive to surpass the norm for our clients. We provide an Investment Policy Statement (“IPS”) for all our clients, as we believe in helping each client develop a roadmap for potential success. We are committed to the precept that by placing the client’s interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

Services

As of 12/31/2015, we provide asset management services for 19 total clients, managing total assets of \$7,770,116 on a discretionary basis, and \$500,000 on a non-discretionary basis.

We provide various asset management, consulting and financial planning services, with an emphasis on developing and facilitating investment activities and trading strategies for institutional investors who are investing in U.S. financial markets. We create an investment policy statement (“IPS”) for all of our clients to use as a roadmap.

We provide discretionary asset management services for our U.S. clients, and nondiscretionary asset management services for our international clients. Our focus is on helping develop and execute plans that are designed to build and preserve your wealth.

With our international clients, our focus is on helping you to formulate a successful investment strategy and establish a relationship with an appropriate custodian in order to execute your trading strategies. We can provide our clients access to stocks, exchange traded funds (“ETF’s”) and other equities listed on United States exchanges and market centers.

For our U.S. clients we manage assets on a discretionary basis, which means you have given us the authority to determine the following without your consent:

1. Securities to be bought or sold for your account

2. Amount of securities to be bought or sold for your account
3. Broker-dealer to be used for a purchase or sale of securities for your account
4. Commission rates to be paid to a broker or dealer for your securities transaction.

For our international clients, we manage assets on a nondiscretionary basis, which means we must obtain your permission before placing any trades for your account.

We do not offer a wrap fee program for clients who want this option.

While we have trading discretion on your account (i.e., placing trades in your account with or without your approval), trading activity is generally limited to help minimize your trading costs. Trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position. Additionally, your account may be rebalanced or reallocated periodically in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur on the schedule we have determined together. You will be responsible for any and all tax consequences resulting from any rebalancing or reallocation of the account. We are not tax professionals and do not give tax advice. However, we will work with your tax professionals to assist you with tax planning. You will have the opportunity to meet with us periodically to review the assets in your account.

1. Financial Planning

We provide our clients with services such as comprehensive financial planning, estate planning, business planning, retirement planning and educational planning. Fee based financial planning is a comprehensive relationship which incorporates many different aspects of your financial status into an overall plan that meets your goals and objectives. The financial planning relationship may consist of face-to-face meetings and discussions with your other advisors (attorneys, accountants, etc.) as necessary.

In performing financial planning services, we typically examine and analyze your overall financial situation, which may include issues such as taxes, insurance needs, overall debt, credit, business planning, retirement savings and reviewing your current investment program. Our services may focus on all or only one of these areas depending upon the scope of our engagement with you.

It is essential that you provide the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. We will discuss your investment objectives, needs and goals, but you are obligated to inform us of any changes. We do not verify any information obtained from you, your attorney, accountant or other professionals.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms and conditions of the relationship. You will also receive this Brochure. You are under no obligation to implement recommendations through us. You may implement your financial plan through any financial organization of your choice.

We obtain information from a wide variety of publicly available sources. We do not have any inside private information about any investments that are recommended. All recommendations developed by us are

based upon our professional judgment. We cannot guarantee the results of any of our recommendations. Choosing which advice to follow is your decision.

Under certain circumstances we may provide an attorney to meet with our clients for a consultation to discuss your financial needs from an estate planning and business planning perspective. We may also provide a tax consultant to assist our clients with any tax planning issues they may have.

2. Asset Management

Asset management is the professional management of securities (stocks, bonds and other securities) and assets (e.g., real estate) in order to meet your specified investment goals. With an Asset Management Account, you engage us to assist you in developing a personalized asset allocation program and custom-tailored portfolio designed to meet your unique investment objectives. The investments in the portfolio account may include mutual funds, stocks, bonds, equity options, futures, etc. We closely monitor the holdings of all our asset management clients.

We will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information. Based on the information you share with us; we will create an IPS that serves as the roadmap to guide your asset management. We will analyze your situation and recommend an appropriate asset allocation or investment strategy. Our recommendations and ongoing management are based upon your investment goals and objectives, risk tolerance, and the investment portfolio you have selected. We will monitor the account, trade as necessary, and communicate regularly with you. You will also receive our Advisory Agreement which describes what services you will receive and what fees you will be charged.

Our services include:

- Reviewing your present financial situation
- Monitoring and tracking assets under management
- Providing asset allocation statement, rebalanced statements as needed
- Advising on asset selection
- Determining market divisions through asset allocation models
- Providing research and information on performance and fund management changes
- Building a risk management profile for you
- Assisting you in setting and monitoring goals and objectives
- Providing personal consultations as necessary upon your request or as needed.

We need you to notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These

restrictions may be a specific company security, industry sector, asset class, or any other restriction you request.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. You are responsible for any taxable events in these instances. Certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is not indicative of future results.

If you decide to implement our recommendations, we will help you open a custodial account(s). We will help you to find the custodian that offers the services necessary to trade your investment strategy.

You will enter into a separate custodial agreement with the custodian. This agreement, among other things, authorizes the custodian to take instructions from us regarding all investment decisions for your account. We will select the securities bought and sold and the amount to be bought and sold, within the parameters of the objectives and risk tolerance of your account. The custodian will effect transactions, deliver securities, make payments and do what we instruct. You are notified of any purchases or sales through trade confirmations and monthly statements that are provided by the custodian. These statements list the total value at the start of the month, itemize all transaction activity during the month, and list the types, amounts, and total value of securities held as of the end of the month. Your statement may be in either printed or electronic form based upon your preferences. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

We are available during normal business hours either by telephone, fax, email, or in person by appointment to answer your questions.

3. Consulting Services

We provide consulting services for our International clients, in order to formulate an investment strategy and help them establish a relationship with a custodian that is appropriate for your investment strategy. Our consulting services are offered and available to international clients only.

Once consulting services are rendered, clients will be offered the option of asset management services, in order to implement the recommendations made by Wilkinson Financial.

4. Insurance Services

We may recommend and sell life, annuity, accident, health, and HMO insurance to all our clients. We will receive the usual and customary commissions associated with these sales from the insurance company. You will not pay a separate fee for these and your advisory fee will not be reduced by any payments we receive from these sales.

Item 5 – Fees and Compensation

We provide asset management, financial consulting and financial planning services for a fee. Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund's prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge.

You could invest in a mutual fund directly, without our services. In that case, you would not receive the services provided by us which are designed, among other things, to assist you in determining which mutual fund or funds are most appropriate to your financial condition and objectives.

We may recommend particular products, and if our recommendations are implemented through us, we may receive compensation from the sale of insurance products or asset management services recommended in the recommendation. This compensation would be in addition to the fee you pay. The fees and expenses you pay for the purchase of these products may be more or less than the expenses you would pay should you decide to implement our recommendations through another investment advisory firm or broker-dealer and are typically determined by the broker-dealer or investment company sponsoring the product. Therefore, a conflict of interest may exist between our interests and your interests since we may recommend products that pay us compensation. We may have an incentive to recommend particular products based upon the potential compensation rather than your needs. This potential conflict is addressed in our Code of Ethics.

1. Financial Planning Fees

We will work with you to create a financial plan. The following fee schedule is utilized in calculating a flat fee for financial planning services as follows:

Net Worth	Fee
\$0-\$2,000,000	2.0%
\$2,000,001-\$8,000,000	1.5%
\$8,000,000+	1.0%

The net worth calculation does not include your primary residence, personal property, or automobiles. The final fee is based on this percent of net worth calculation, and then is negotiated and set as a flat fee on an annual or monthly basis, depending on the complexity of client circumstances, the number of

expected client meetings and phone calls, scope of topics reviewed, prior relationships and other holdings with Wilkinson Financial.

This fee may be negotiable under certain circumstances depending upon existing client relationships.

Based upon your needs, we may also provide additional consultations throughout the year to advise and counsel you about other financial issues. We can help you with transition planning, major transaction analysis, coordinated with cash flow needs, retirement needs, estate planning needs, income tax planning, life and disability insurance needs, investment needs, and college education planning.

The Financial Planning Agreement will show the fee schedule you will pay. A deposit of 50% of the fee is due at the time the agreement is signed. The remainder of the fee is due upon presentation of a plan. Upon client request, we can accept full payment of financial planning fees. Plans will be presented to you within six months of the contract date, provided that all information needed to prepare the plan has been promptly provided to us.

In the event that you cancel the Financial Planning Agreement, you will need to submit a written notice of cancellation. Upon termination of the Financial Planning Agreement, any prepaid fees that are in excess of the financial services performed will be promptly refunded to you. Any fees that are due, but have not been paid, will be billed to you and are due immediately.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

2. Asset Management Fees

We have a minimum account opening balance of \$500,000. The fee charged is based upon the amount of money you invest. Multiple accounts of immediately-related family members, at the same mailing address, will be considered one consolidated account for billing purposes. The monthly fee will be charged for the total of all of the accounts comprising the consolidated account. The total fee will be billed to one selected Client account unless arranged otherwise between us. Fees are charged monthly in advance. Under some circumstances, fees can be charged in arrears based upon relationships with different custodians. Should this circumstance apply, the client will be made aware and written acknowledgment of this arrangement will be provided. Payments are due and will be assessed on the first day of each month, based on the average balance of the previous month period and will be calculated as follows:

Percentage	Portfolio Size (AUM)
1.5%	Any Size

The fee shown above is an annual fee. If this fee structure is utilized, you will be billed one twelfth of this amount on a monthly basis. No increase in the annual fee shall be effective without prior written notification to you. We believe our advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

In certain circumstances, fees and account minimums may be negotiable depending on the complexity of client circumstances, the number of expected client meetings and/or phone calls, prior relationships as well as related account holdings. Our fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of your funds.

For international clients with nondiscretionary asset management accounts, the fee for asset management is not a percentage of the portfolio size, but is rather a negotiated flat fee. Our maximum flat fee for non-discretionary asset management is \$15,000.

Certain strategies offered by us may involve investment in mutual funds. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as “12(b)(1) fees”. These 12(b)(1) fees come from fund assets, and thus indirectly from clients’ assets. We do not receive any compensation from these fees. The 12(b)(1) fee, deferred sales charges and other fee arrangements will be disclosed upon your request and are typically described in the applicable fund’s prospectus.

The fees we charge can be deducted directly from your account at the custodian. We will instruct the custodian to deduct the fees from your account at the end of the month. This fee will show up as a deduction on your following month's account statement from the custodian. We may also invoice your management fee directly to you for payment to us within 10 days.

Management fees are prorated for each contribution and withdrawal made during the applicable calendar month (with the exception of small inconsequential contributions and withdrawals). You will be provided with a monthly statement reflecting deduction of the advisory fees.

Either party may terminate the relationship with a thirty (30) day written notice. Upon termination of any account, any prepaid fees that are in excess of the management services performed will be promptly refunded to you. Any fees that are due, but have not been paid, will be billed to you and are due immediately.

3. Consulting Fees

We can provide research and advice concerning any legal and legitimate investment for which public information is readily available. We can also provide an-in depth analysis of your financial situation or other defined projects as requested on a fee only basis. We will charge a fixed project cost to be negotiated on an individual basis, depending on various factors such as complexity of client circumstance, number of expected client meetings and phone calls, prior relationships and number of related account holdings. We negotiate a flat fee based on the complexity of the consulting services rendered. The maximum fixed fee charged by us for our consulting services is \$15,000. Once our consulting services are rendered, we offer asset management services in order to implement the strategies we recommend, as discussed in the preceding section entitled “Asset Management Fee Schedule”.

Our Consulting-Agreement defines what fees are charged and their frequency. We bill fees in advance on a quarterly basis.

4. Insurance Fees

Our Advisors may recommend and sell life insurance to U.S. clients and will receive the usual and customary commissions in addition to any agreed upon advisory fee. We will not reduce your advisory fee by the amount we receive in commissions.

Item 6 – Performance Based Fee and Side by Side Management

We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Client(s)

We provide portfolio management and financial consulting services to individuals, high net worth individuals, trusts, estates, corporate charitable organizations, foundations, endowments, corporations, trusts, and small businesses.

Our minimum account opening balance for our asset management services is \$500,000 which may be negotiable based upon certain circumstances.

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

We use fundamental analysis, modern portfolio theory, technical analysis, cyclical analysis, and/or targeted asset allocation as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

1. Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

In order to perform this fundamental analysis, we use many resources, such as:

- Morningstar

- Financial newspapers and magazines (e.g. Wall Street Journal, Forbes, etc.)
- Annual reports, prospectuses, filings with the Securities and Exchange Commission
- Company press releases and websites

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days
- Short sales
- Margin Transactions
- Option writing, including covered options, uncovered options or spreading strategies.

2. Modern Portfolio Theory (MPT)

We may also use Modern Portfolio Theory to help them select the funds we use in your account.

Modern portfolio theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

3. Technical Analysis

Technical Analysis attempts to determine a security's value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market's price reflects all relevant information so the analysis focuses on the history of a security's trading behavior rather than external drivers such as economic, fundamental and news events.

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases (securities held at least a year)
- Short term purchases (securities sold within a year)
- Trading (securities sold within 30 days)
- Margin Transaction
- Option writing, including covered, uncovered and spread option strategies.

4. Cyclical Analysis

We may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in your investment strategies depending upon long and short-term trends in financial markets and the performance of the overall national and global economy.

5. Targeted Asset Allocation

We may combine fundamental analysis, modern portfolio theory, technical analysis, and/or cyclical analysis to determine asset allocation strategies. Six targeted asset allocation model portfolios covering everything from conservative income to very aggressive growth oriented approaches have been compiled by us. We will assign you a targeted portfolio that meets your goals and time horizon, while addressing the level of risk you are comfortable assuming.

6. Risks

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to handle. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

1. Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

2. Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The data used may be at least six months out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.
-

3. Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- **Country Risk** - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- **Currency Risk** -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- **Income Risk** - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- **Industry Risk** - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Inflation Risk** - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- **Manager Risk** -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk** -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

4. Overall Fund Risk

- Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.

- Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you'll need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

5. Stock Fund Risk

Although a stock fund's value can rise and fall quickly over the short term, historically stocks have performed better over the long term than other types of investments — including corporate bonds, government bonds, and treasury securities.

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Not all stock funds are the same. For example:

- Growth funds focus on stocks that may not pay a regular dividend but have the potential for large capital gains.
- Income funds invest in stocks that pay regular dividends.
- Index funds aim to achieve the same return as a particular market index, such as the S&P 500 Composite Index, by investing in all — or perhaps a representative sample — of the companies included in an index.
- Sector funds may specialize in a particular industry segment, such as technology or consumer products stocks.

6. Technical Analysis risk

- Technical analysis is derived from the study of market participant behavior and its efficacy is a matter of controversy.
- Methods vary greatly and can be highly subjective; different technical analysts can sometimes make contradictory predictions from the same data.
- Models and rules can incur sufficiently high transaction costs.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management.

We have no information to disclose here about the Wilkinson Financial or any of our investment advisors. We adhere to high ethical standards for all advisors and associates. We strive to do what is in your best interests.

Item 10 – Other Financial Industry Activities and Affiliations

The investment adviser representatives of Wilkinson Financial have the following outside business activities to disclose.

1. Insurance Agent

Samuel Wilkinson, the Managing Member and Chief Compliance Officer for Wilkinson Financial, is a licensed insurance agent/broker for life, accident, health, and HMO insurance with various companies. The sale of these products accounts for approximately 10% of his time.

Samuel Wilkinson may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

2. Other Affiliations

Samuel Wilkinson also provides services for Tiburon Xchange, a background check company owned by his family, where he devotes approximately 1% of his time checking finances. Samuel is also a Herbalife independent distributor, for personal sales only and does not participate in down-line recruiting, where he devotes approximately 1% of his time.

Samuel Wilkinson is also the host of a radio show called Wilkinson Financial Radio Show. He spends approximately 1% of his time doing the show and receives no compensation.

Item 11 – Code of Ethics, Participation or Interest in Client Accounts and Personal Trading

1. General Information

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

2. Participation or Interest in Client Accounts

We may recommend securities to you that we have purchased for our own accounts. We may trade securities in our account that we have recommended to you as long as we place our orders after your Orders. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices
- Participating in client accounts.

You may request a copy of the firm's Code of Ethics by contacting Samuel Wilkinson.

3. Personal Trading

We have established the following restrictions in order to ensure our fiduciary responsibilities to you are met:

- No securities for our personal portfolio(s) shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of Investment Advisory Representative(s) of Wilkinson Financial, unless the information is also available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

However, some securities trade in sufficiently broad markets to permit transactions by clients to be completed without an appreciable impact on the markets of the securities. Under certain circumstances, exceptions may be made to the policies stated above. Records of these trades, including the reasons for the exceptions, will be maintained with our records as required.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

4. Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We

also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

5. Conflicts of Interest

Samuel Wilkinson employs the same strategy for his personal investment account as he does for his clients. However, he does not place his orders in a way to benefit from the purchase or sale of a security.

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Item 12 – Brokerage Practices

1. Soft Dollars

Soft dollar benefits may not be proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

The custodians we recommend may provide us with certain brokerage and research products and services that qualify as "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934 ("Exchange Act"). These research products and/or services will assist the Advisor in its investment decision making process. Such research generally will be used to service all of the Advisor's clients, but brokerage commissions paid by the client may be used to pay for research that is not used in managing the client's account. The account may pay to a broker-dealer a commission greater than another qualified broker-dealer might charge to effect the same transaction where the Advisor determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received.

Because soft dollar benefits could be considered to provide a benefit to the adviser that might cause the client to pay more than the lowest available commission without receiving the most benefit, they are considered a conflict of interest in recommending or directing custodial and third party managerial services. Wilkinson Financial mitigates these conflicts of interest through strong oversight of soft-dollar arrangements by the Chief Compliance Officer, in order to assure the soft dollar benefits, serve the best interests of the client.

There may other benefits from using the custodians we recommend such as software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Other services may include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables

and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Wilkinson Financial may contract directly. Wilkinson Financial may receive seminar expense reimbursements from product sponsors which may be based on the sales of products to their clients. Wilkinson Financial advisors could also receive 12(b) (1) fees as a result of placing clients with mutual funds. Clients will receive full disclosure regarding 12(b) (1) fees prior to such a sale.

2. Best Execution

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

3. Brokerage for Client Referrals

We do not receive any compensation or incentive for referring you to broker-dealers for brokerage trades, other than soft dollars. We may receive additional compensation for sales of insurance products only.

4. Directed Brokerage

Not all advisory firms require you to direct brokerage to a specific broker-dealer or custodian.

By directing brokerage to the custodians we recommend, you may pay higher fees or transaction costs than those obtainable by other broker-dealers or custodians. In most cases, we believe you are paying a discounted and reasonable rate. We will aggregate orders for the purchase or sale of securities for various client accounts when we have the opportunity to do so, consistent with our obligation of best execution.

If you elect to select your own broker-dealer or custodian and direct us to use them, you may pay higher or lower fees than what is available through our relationships. Generally, we will not negotiate lower rates below the rates established by the executing broker-dealer or custodian for this type of directed brokerage account, unless we believe that such rate is unfair or unreasonable for the size and type of transaction.

5. Trading

Transactions for each client account generally will be effected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such Orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

Item 13 – Review of Accounts

1. Reviews

Reviews are conducted at least annually or as agreed to by us. Reviews will be conducted by Samuel Wilkinson, the Chief Compliance Officer and Managing Member. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

2. Reports

You will be provided with account statements reflecting the transactions occurring in the account on at least a monthly basis. These statements will be written or electronic depending upon what you selected when you opened the account. You are obligated to notify us of any discrepancies in the account(s) or any concerns you have about the account(s).

Item 14 – Client Referrals and Other Compensation

We do not receive any compensation for referring clients to another advisor nor do we pay any compensation to another advisor if they refer clients to us.

Samuel Wilkinson is a licensed insurance agent and may receive compensation for the sale of insurance products.

Item 15 – Custody

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of your account(s) if we have the ability to deduct your monthly fees from the custodian. We use the custodial firm that we believe is most suitable for your financial needs as the custodian and/or broker-dealer for all your accounts. You should receive at least monthly statements from the broker-dealer or custodian that holds and maintains your investment assets. We urge you to carefully review such statements and compare this official custodial record to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If you notice any discrepancies, please contact Samuel Wilkinson.

Unless we select the option for direct billing, we will ask the custodian to debit your account directly and send the payment to us. The client must agree to authorize the custodian to pay directly to Wilkinson Financial upon receipt of notice the account's investment advisory services fee. The custodian will provide you immediate transaction confirmations and monthly statements, either by mail or electronically per your request. Monthly statements list the total value of the account at the start and end of the month

and itemize all transactions and security positions. For taxable accounts, the custodian will provide you with consolidated year-end summary statements including IRS forms 1099 and other tax-related forms, as applicable. We are not allowed to make alterations or amendments to the custodian's statement. This preserves the integrity of the custodian's statement and provides you with an independent appraisal of the account.

Item 16 – Investment Discretion

For our U.S. clients we receive discretionary authority from you at the beginning of an advisory asset management relationship to select the identity and amount of securities to be bought or sold. This information is described in the Advisory Agreement you sign with us. In all cases, however, this discretion is exercised in a manner consistent with your stated investment objectives for your account. When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions you have set. For registered investment companies, our authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

For our international clients we do not receive discretionary authority from you to select the type of securities and amount of securities to be bought or sold. We usually only have the ability to rebalance and reallocate your accounts on a monthly basis, with your permission.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We are authorized to instruct the custodian to forward you copies of all proxies and shareholder communications relating to your account assets.

Item 18 – Financial Information

We are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of five hundred dollars and more than six months in advance of advisory services rendered.

Item 19 – Requirements for State Registered Advisers

Firm Principal

There is one principal of Wilkinson Financial, Samuel Wilkinson. He is the Chief Compliance Officer and Managing Member and was born in 1980. His information is as follows:

ADV Part 2B Brochure Supplement – Samuel Wilkinson

Item 1 – Cover Page

Samuel B. Wilkinson

Wilkinson Financial LLC

6601 Cypresswood Drive, Suite 232

Spring, Texas 77379

www.wilkinsonfinancial.com

(808) 782-6761

This Brochure supplement provides information about Samuel B. Wilkinson and supplements the Wilkinson Financial LLC (“Wilkinson Financial”) Brochure. You should have received a copy of that Brochure. Please contact Wilkinson Financial if you did not receive the Brochure or if you have any questions about the contents of this supplement. Additional information about Samuel B. Wilkinson is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Education

Bachelor of Science, International Business Management 2007
Brigham Young University - Hawaii, Laie, HI

Designations

CFP® 2011
Certified Financial Planner Graduate Certificate Program
Rice University Houston, TX

Minimum Designation Requirements

Certified Financial Planner (CFP)

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Prerequisites/Experience: Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year)

Educational Requirements: Complete an advanced college level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

Examination Type: Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning Issues and apply one's knowledge of financial planning to real world circumstances.

Ethics: Agree to be bound by CFP Board's Standards of Professional/Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

Continuing Education/Experience Requirements: Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct to maintain competence and keep up with developments. In the financial planning field.

Ethics: Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Business History

October 2013 – Present	CCO and Managing Member at Wilkinson Financial LLC
November 2012 – October 2013	Registered Representative at LPL Financial, LLC
March 2008 – November 2012	Financial Adviser at Ameriprise Financial Services, Inc.
January 2005 – December 2007	Student at Brigham Young University – Hawaii
April 2006 – August 2006	Salesman at Ford

Item 3 – Disciplinary History

Neither Wilkinson Financial nor Samuel Wilkinson has any disciplinary history to disclose.

Item 4 – Other Business Activities

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Samuel Wilkinson has the following outside business activities and/or affiliations to disclose.

Samuel Wilkinson, the Managing Member and Chief Compliance Officer for Wilkinson Financial, is a licensed insurance agent/broker for life, accident, health, and HMO insurance with various companies. The sale of these products accounts for approximately 10% of his time. Samuel Wilkinson may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Samuel Wilkinson also provides services for Tiburon Xchange, a background check company owned by his family, where he devotes approximately 1% of his time checking finances. Samuel is also a Herbalife independent distributor, for personal sales only and does not participate in down-line recruiting, where he devotes approximately 1% of his time.

Samuel Wilkinson is also the host of a radio show called Wilkinson Financial Radio Show which he spends approximately 1% of his time and receives no compensation.

Item 5 – Additional Compensation

Samuel Wilkinson does not receive any additional compensation for providing advisory services. He may receive compensation from the sales of insurance products.

Item 6 – Supervision

Samuel Wilkinson is the Chief Compliance Officer and Managing Member, and performs all supervisory duties for his firm.

Item 7 – Requirements for State-Registered Advisers

Samuel Wilkinson has no reportable events to disclose here.

Performance Fees

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

Other Relationships

Neither the firm nor Samuel Wilkinson has any relationship with any issuer of securities.

ADV Part 2B Brochure Supplement – Brian Pablo

Item 1 – Cover Page

Brian Pablo

Wilkinson Financial LLC
6601 Cypresswood Drive, Suite 232
Spring, Texas 77379
www.wilkinsonfinancial.com
(808) 782-6761

This Brochure supplement provides information about Brian Pablo and supplements the Wilkinson Financial LLC (“Wilkinson Financial”) Brochure. You should have received a copy of that Brochure. Please contact Wilkinson Financial if you did not receive the Brochure or if you have any questions about the contents of this supplement. Additional information about Brian Pablo is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Education

Bachelor of Science 2007
George Mason University, Fairfax Station, VA

Business History

September 2014 – Present	Investment Adviser Representative at Wilkinson Financial LLC
June 2007 – Present	Supervisor at Arthur Murray Dance Studios
October 2008 – November 2012	Financial Adviser at Ameriprise Financial Services, Inc.
May 2003 – May 2007	Front End Supervisor at Costco Wholesale

Item 3 – Disciplinary History

Neither Wilkinson Financial nor Brian Pablo has no disciplinary history to disclose.

Item 4 – Other Business Activities

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Brian Pablo has the following activities and/or affiliations to disclose.

Brian Pablo is a supervisor at Arthur Murray Dance Studios, where he is responsible for sales and extensions of client programs, in addition to providing budget support, and holding weekly staff meetings. Approximately 10% of his time is devoted to this role.

Item 5 – Additional Compensation

Brian Pablo has no outside business activities and/or affiliations to disclose.

Item 6 – Supervision

Samuel Wilkinson is the Chief Compliance Officer and Managing Member, and performs all supervisory duties for his firm. Please contact him at 808-782-6761 with questions regarding supervision.

Item 7 – Requirements for State-Registered Advisers

Brian Pablo has no reportable events to disclose here.

Performance Fees

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

Other Relationships

Neither the firm nor Brian Pablo has any relationship with any issuer of securities.

ADV Part 2B Brochure Supplement – Chase Thomas

Item 1 – Cover Page

Chase Thomas

Wilkinson Financial LLC
6601 Cypresswood Drive, Suite 232
Spring, Texas 77379
www.wilkinsonfinancial.com
(808) 782-6761

This Brochure supplement provides information about Chase Thomas and supplements the Wilkinson Financial LLC (“Wilkinson Financial”) Brochure. You should have received a copy of that Brochure. Please contact Wilkinson Financial if you did not receive the Brochure or if you have any questions about the contents of this supplement. Additional information about Chase Thomas is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Education

Bachelor of Arts, Dance Performance 2012
Brigham Young University – Provo, UT

Designations

CFP® 2015

Minimum Designation Requirements

Certified Financial Planner (CFP)

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

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

Prerequisites/Experience: Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year)

Educational Requirements: Complete an advanced college level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

Examination Type: Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning Issues and apply one's knowledge of financial planning to real world circumstances.

Ethics: Agree to be bound by CFP Board's Standards of Professional/Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

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

Continuing Education/Experience Requirements: Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards

of Professional Conduct to maintain competence and keep up with developments. In the financial planning field.

Ethics: Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Business History

July 2015 – Present	Investment Adviser Representative at Wilkinson Financial LLC
June 2012 – July 2015	Financial Representative at Fidelity Investments
April 2009 – August 2009	Financial Representative at Summit Financial
June 2006 – January 2012	Special Projects at American Stone

Item 3 – Disciplinary History

Neither Wilkinson Financial nor Chase Thomas has any disciplinary history to disclose.

Item 4 – Other Business Activities

As noted in item 10 “Other Financial Industry Activities and Affiliations” above, Chase Thomas has the following activities and/or affiliations to disclose.

Chase Thomas works as a model for Urban Talent approximately 1% of his time. He will take photos every few months.

Chase Thomas is a licensed insurance agent/broker for life, accident, health, and HMO insurance with various companies. The sale of these products accounts for approximately 10% of his time. Chase Thomas may recommend insurance products and may also, as independent insurance agents, sell those recommended insurance products to Clients. When such recommendations or sales are made, a conflict of interest exists as the Insurance licensed Investment Adviser Reps earn insurance commissions for the sale of those products, which may create an incentive to recommend such products. We require that all Investment Adviser Reps disclose this conflict of interest when such recommendations are made. Also, we require Investment Adviser Reps to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Item 5 – Additional Compensation

Chase Thomas does not receive any additional compensation for providing advisory services. He may receive compensation from the sales of insurance products.

Item 6 – Supervision

Samuel Wilkinson is the Chief Compliance Officer and Managing Member, and performs all supervisory duties for his firm. Please contact him at 808-782-6761 with questions regarding supervision.

Item 7 – Requirements for State-Registered Advisers

Chase Thomas has no reportable events to disclose here.

Performance Fees

We do not charge a performance-based fee (fees based on a share of capital gains on, or capital appreciation of, the assets of a client) for our normal asset management accounts.

Other Relationships

Neither the firm nor Chase Thomas has any relationship with any issuer of securities.