

## Item 1 – Cover Page

**Wilson Wealth Stewardship, Inc.**  
200 Corporate Center Drive, Suite B-1  
Stockbridge, GA 30281  
(470) 357-6900

Date of Disclosure Brochure: February 2020

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This disclosure brochure provides information about the qualifications and business practices of Wilson Wealth Stewardship, Inc. (also referred to as I, me and Wilson Wealth Stewardship throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact D. Mark Wilson at 470-357-6900 or [mark@wilsonws.com](mailto:mark@wilsonws.com). The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Wilson Wealth Stewardship is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view my firm's information on this website by searching for Wilson Wealth Stewardship, Inc. or my firm's CRD number 297725.

\*Registration as an investment adviser does not imply a certain level of skill or training.

\*\*Although Wilson Wealth Stewardship is referred to as I or me throughout this brochure for your convenience, please understand that any engagement described under this brochure will be made with the legal entity of Wilson Wealth Stewardship, Inc.

## **Item 2 – Material Changes**

Since our last required annual amendment to this disclosure brochure was filed in January 2019, we have made no material changes to the brochure.

I will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after my firm's fiscal year ends. My firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, I will also offer or provide a copy of the most current disclosure brochure. I may also provide other ongoing disclosure information about material changes as necessary.

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## Item 4 – Advisory Business

Wilson Wealth Stewardship is an investment adviser registered with the State of Georgia and is a corporation formed under the laws of the State of Georgia.

- D. Mark Wilson is the President and 100% owner of Wilson Wealth Stewardship. Full details of my education and business background are provided at *Item 19* of this Disclosure Brochure.
- Wilson Wealth Stewardship was approved as a Registered Investment Adviser in July 2018.

### **Introduction**

The investment advisory services of Wilson Wealth Stewardship are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of Wilson Wealth Stewardship (referred to as your investment adviser representative throughout this brochure).

### **Description of Advisory Services**

The following are descriptions of the primary advisory services of Wilson Wealth Stewardship. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Wilson Wealth Stewardship before I can provide you the services described below.

**Sub-Advisor Program** - Wilson Wealth Stewardship offers various programs that allows you to select third-party non-affiliated investment managers (“Sub-Advisors”) to design and manage model portfolios for your assets on a Co-Advisor basis.

We will assist you in completing a client profile questionnaire and review the information you provide. We will then recommend a Sub-Advisor and corresponding model portfolio that aligns with your disclosed risk tolerance and investment objectives. The Sub-Advisor will be responsible for entering all asset allocation transactions on your behalf within the Sub-Advisor Platform. We are only able to recommend/select Sub-Advisors which have been approved by the sponsoring advisory platform.

The advisory platforms require that these Sub-Advisors follow certain parameters when building and managing a model portfolio the Sub-Advisor will be given discretionary authority to select the specific investments for your account based on information and/or signals provided by the Sub-Advisors; we will not have discretionary authority to select any specific funds for your account under this program. However, we will maintain the discretionary authority to move client assets between various Sub-Advisor platforms and between the model portfolios provided by the Sub-Advisor. The Sub-Advisor will implement the model for your account by acquiring the fund shares that are represented in the selected model portfolios. We will be available to answer questions that you may have regarding your account and act as the communication conduit between you and the Sub-Advisors.

You should be aware that there might be other third-party managed programs not recommended by our firm, that are suitable for you and that might be less costly than arrangements recommended by our firm. No guarantees can be made that your financial goals or objectives will be achieved through the managed account program or by a recommended/selected Sub-Advisor. Further, no guarantees of performance

can ever be offered by our firm (*Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.*)

### **Selection of Other Advisors**

Wilson Wealth Stewardship offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary. As a result of the referral, we are paid a portion of the fee charged and collected by the third-party money managers in the form of solicitor fees. Each solicitation arrangement is performed pursuant to a written solicitation agreement and is in compliance with SEC Rule 206(4)-3 and applicable state securities rules and regulations.

Under this program, we assist you with identifying your risk tolerance and investment objectives. We recommend third-party money managers in relation to your stated investment objectives and risk tolerance, and you may select a recommended third-party money manager or model portfolio based upon your needs. You must enter into an agreement directly with the third-party money manager who provides your designated account with asset management services.

We are available to answer questions that you may have regarding your account and act as the communication conduit between you and the third-party money manager. The third-party money manager may take discretionary authority to determine the securities to be purchased and sold for your account. We do not have any trading authority with respect to your designated account managed by the third-party money manager.

Although we review the performance of numerous third-party investment adviser firms, we enter into only a select number of relationships with third-party investment adviser firms that have agreed to pay us a portion of the overall fee charged to our clients. Therefore, Wilson Wealth Stewardship has a conflict of interest in that it will only recommend third-party investment advisors that will agree to compensate us for referrals of our clients.

Clients are advised that there may be other third-party managed programs not recommended by our firm, that are suitable for the client and that might be more or less costly than arrangements recommended by our firm. No guarantees can be made that a client's financial goals or objectives will be achieved by a third-party investment adviser recommended by our firm. Further, no guarantees of performance can ever be offered by our firm (*Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more details.*)

### **Consulting Services**

Wilson Wealth Stewardship offers ongoing advisement consultations for clients regarding 529 college savings plans. When providing these services, we review your financial situation, goals and objectives as well as the investment options available in the 529 plan. Wilson Wealth Stewardship will review your 529 plan account at agreed upon intervals and will make such recommendations from the list of available investment options in your 529 account as are deemed appropriate and consistent with your stated investment objectives and risk tolerance. 529 college savings plans limit how often an account owner can

reallocate existing assets within a 529 college savings plan account such as only twice per calendar year, and consequently our services are limited to such restrictions. These services do not constitute asset management services for your 529 plan account; we do not have investment discretion or trading authority over your 529 plan account. You determine whether or not to implement our advice. The implementation of any trades in your 529 plan account is your responsibility.

Wilson Wealth Stewardship also offers advice to clients regarding asset allocation benefits selections for clients regarding employment retirement benefits. However, Wilson Wealth Stewardship does not offer investment advice for assets held in employer sponsored retirement plans (i.e. 401(k), 403(b), or TSP). At the client's request, Wilson Wealth Stewardship may recommend a third party to manage portfolio models within these employer sponsored plans. Wilson Wealth Stewardship will initially review and provide recommendations from the information provided by the client which are consistent with Client's stated investment objectives and risk tolerance. The services under this Agreement do not constitute asset management services or asset advisory services for Client's accounts; Wilson Wealth Stewardship will not have investment discretion or trading authority over Client's accounts. Client will determine whether or not to implement Wilson Wealth Stewardship's advice. These consultations will cease once Client has made benefits selections. The implementation of any asset allocations or benefits elections will be solely the responsibility of Client.

### **Seminars**

Wilson Wealth Stewardship will occasionally provide seminars in areas such as financial planning, retirement planning and estate planning. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants.

### **Workshops**

Wilson Wealth Stewardship offers educational, informative and motivational workshops to the public as well as to associations, family foundations and employers. Workshops are always offered on an impersonal basis and do not focus on the individual needs of the participants.

### **Limits Advice to Certain Types of Investments**

Wilson Wealth Stewardship provides investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Fixed Income Securities
- Corporate Debt Securities
- Insurance and Annuities

Although I generally provide advice only on the products previously listed, I reserve the right to offer advice on any investment product that may be suitable for each client's specific circumstances, needs, goals and objectives.

It is not my typical investment strategy to attempt to time the market, but I may increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. I may modify my investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations.

*(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

### **Tailor Advisory Services to Individual Needs of Clients**

Wilson Wealth Stewardship's advisory services are always provided based on your individual needs. This means, for example, that when I provide asset management services, you are given the ability to impose restrictions on the accounts I manage for you, including specific investment selections and sectors. I work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information. My financial consulting services are always provided based on your individual needs. When providing financial consulting services, I work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

I will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with my investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Wilson Wealth Stewardship will provide recommendations to Client (or exercise discretion if authorized below) to utilize specific sub-Advisor(s) (individually "Sub-Advisor" and collectively Sub-Advisors) to manage Account or a portion of the assets of Account. Wilson Wealth Stewardship will conduct due diligence of any recommended Sub-Advisor and monitor the performance of Sub-Advisor with respect to the Sub-Advisor's management of the designated assets of Account relative to appropriate peers and/or benchmarks. Wilson Wealth Stewardship will be available to answer questions Client may have regarding any portion of Client's Account managed by a Sub-Advisor and will act as the communication conduit between Client and the Sub-Advisor.

If the Sub-Advisor is registered as an investment adviser, a complete description of the Sub-Advisor's services and fees will be disclosed in the Sub-Advisor's Form ADV Part 2A Disclosure Brochure that will be provided to client.

### **Client Assets Managed by Wilson Wealth Stewardship**

As of November 27, 2019, Wilson Wealth Stewardship had \$16,931,690 non-discretionary assets under management and \$0 discretionary assets under management.

## **Item 5 – Fees and Compensation**

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding my firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other

sources. The exact fees and other terms will be outlined in the agreement between you and Wilson Wealth Stewardship.

### **Sub-Advisor Managed Account Program**

Fees for services provided through the Sub-Advisor Managed Account Program are charged based on a percentage of assets under management paid monthly, in arrears, based upon the average daily balance of the assets under management calculated on the last business day of each month. No increase in the annual fee percentage shall be effective without prior written notification to the client.

The services under this program continue in effect until terminated by either party (i.e., Wilson Wealth Stewardship, Sub-Advisor or you) by providing written notice of termination to the other parties. If services are terminated at any time other than the last business day of the month, fees for the final billing period will be determined on a pro rata basis using the number of days services are actually provided during the final period.

Fees for services provided through the Sub-Advisor Managed Account Program are negotiable based upon the type of client, the complexity of the client's situation, the composition of the client's account (i.e., equities versus mutual funds or ETFs), the potential for additional account deposits, the relationship of the client with the investment adviser representative, the total amount of assets under management for the client, and the Sub-Advisor chosen.

Wilson Wealth Stewardship may charge up to a maximum of 1.4% for Clients enrolled in the Sub-Advisor Managed Account Program for the services rendered by Wilson Wealth Stewardship. In addition, Clients will also be charged an asset management fee by the Sub-Advisor/Co-Advisor for the services they render for up to a total of 2.9%. Details on the exact Wilson Wealth Stewardship fee and Sub-Advisor/Co-Advisor Manager's fee will be disclosed to Clients via the Client's Investment Management Agreement which is executed by and between Client, Wilson Wealth Stewardship and Sub-Advisor/Co-Advisor.

Wilson Wealth Stewardship believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual fee may be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you can also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

Fees for services provided through the Sub-Advisor Managed Account Program will be deducted from your account by the qualified custodian(s). Generally, the account custodian will pay each party to the Sub-Advisor relationship their proportional share of the advisory fee directly. Under certain circumstances the custodian may remit the full amount of the advisory fee to the Sub-Advisor firm which will remit a portion of the advisory fees to Wilson Wealth Stewardship. The fee payment process will be explained in your Advisory Agreement with the Sub-Advisor. The Sub-Advisor will be solely responsible for the calculation of all asset management fees and providing instructions to the account custodians to deduct the asset management fees from client accounts. You must authorize the qualified custodian(s) of your account to deduct fees from your account and pay such fees directly to the Sub-Advisor. You should review your account statements received from the qualified custodian(s) and verify that appropriate investment advisory fees are being deducted. The qualified custodian(s) will not verify the accuracy of the investment advisory fees deducted.



Services through the Sub-Advisor Managed Account Program can be offered both on a wrap fee and non-wrap fee basis. In a non-wrap fee program, the qualified custodian will charge a separate commission, ticket charge or fee for executing a securities transaction in addition to the investment advisory fee. Wilson Wealth Stewardship does not receive any portion of such commissions, ticket charges or custodial fees from the qualified custodian. If you choose to receive services through the wrap fee program, you will only pay fees based on assets under management and you will not pay a separate commission, ticket charge, or custodian fee, for the execution of transactions in your account. The sub advisor and our firm will receive a portion of the fee as compensation for services.

In addition to the fees described above, you can also incur certain charges imposed by third parties in connection with investments made through your account including, but not limited to, ETF sales loads and management fees, sales charges and management fees for alternative investments, mutual fund sales loads, periodic mutual fund fees (e.g. 12b-1 trails) and surrender charges, IRA and qualified retirement plan fees, and charges imposed by the qualified custodian(s) of your account. Management fees charged are separate and distinct from the fees and expenses charged by investment company securities that may be recommended to you. A description of these fees and expenses are available in each investment company security's prospectus. Wilson Wealth Stewardship will not receive any portion of these additional fee charges.

### **Third-Party Money Managers**

Third-party managers generally have account minimum requirements that will vary among third-party money managers. Account minimums are generally higher on fixed income accounts than for equity-based accounts. A complete description of the third-party money manager's services, fee schedules and account minimums will be disclosed in the third-party money manager's disclosure brochure which will be provided to you prior to or at the time an agreement for services is executed and the account is established.

The actual fee charged to you will vary depending on the third-party money manager. All fees are calculated and collected by the third-party money manager who will be responsible for delivering our portion of the fee paid by you to us. Details on the exact third-party money manager fee will be disclosed to Clients via the Client's Investment Management Agreement which is executed by and between Client and the third-party money manager.

Under this program, you might incur additional charges including but not limited to, mutual fund sales loads, 12b-1 fees and surrender charges, and IRA and qualified retirement plan fees. Wilson Wealth Stewardship will not receive any portion of these additional fee charges.

We have a conflict of interest by only offering those third-party money managers that have agreed to pay a portion of their advisory fee to us and have met the conditions of our due diligence review. There may be other third-party money managers that might be suitable for you that could be more or less costly. The portion of the advisory fee paid to Wilson Wealth Stewardship may be negotiated by the investor and their advisor. No guarantees can be made that your financial goals or objectives will be achieved. Further, no guarantees of performance can be offered.

## **Consulting Services**

### ***Fees for Consulting Services***

Fees charged for our 529 Consulting Services are charged based on a percentage of asset value of the account, billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated based on the fair market value of your account as of the last business day of the current billing period. Fees are prorated (based on the number of days service is provided during the initial billing period) for your account opened at any time other than the beginning of the billing period. If services are commenced in the middle of the billing period, then the prorated fee for that billing period will be billed in arrears at the end of that billing period. Fees charged for our consulting services are negotiable at the discretion of the Advisor based upon other business activity conducted by the client and the relationship of the client to the advisor.

The annual fee for 529 Consulting Services will be 1.40%.

Wilson Wealth Stewardship believes that its annual fee is reasonable in relation to: (1) services provided and (2) the fees charged by other investment advisers offering similar services/programs. However, our annual fee could be higher than that charged by other investment advisers offering similar services/programs. In addition to our compensation, you can also incur charges imposed at the mutual fund level (e.g., advisory fees and other fund expenses).

### ***Other Fee Terms for Consulting Services***

Consulting Fees will be invoiced directly to each client on quarterly basis. Clients will pay for consulting fees by remitting a check upon receipt of their quarterly invoice.

You should notify Wilson Wealth Stewardship within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

To the extent that you personally engage an outside professional (i.e. attorney, independent investment adviser or accountant) during the financial consulting engagement, you will be responsible for the payment of the fees for the services of such an outside professional, and Wilson Wealth Stewardship will not be required to reimburse Client for such payments.

All fees paid to Wilson Wealth Stewardship for services are separate and distinct from the commissions, fees and expenses charged by insurance companies associated with any disability insurance, life insurance and annuities subsequently acquired by you. If you sell or liquidate certain existing securities positions to acquire any insurance or annuity, you could also be required to pay a commission and/or deferred sales charges in addition to the financial consulting fees paid to Wilson Wealth Stewardship and any commissions, fees and expenses charged by the insurance company for subsequently acquired insurance and/or annuities.

All fees paid to Wilson Wealth Stewardship for financial consulting services are separate and distinct from the commissions charged by a broker-dealer or asset management fees charged by an investment adviser to implement such recommendations.

### **Seminars**

No fees are charged for seminars. However, if I am hired by larger groups, such as corporations, I reserve the right to charge fees to cover the expenses incurred by me for presenting the seminars. In this case, all fees and payment provisions will be fully disclosed to you prior to the seminar being presented.

### **Workshops**

Workshops are always provided free of charge.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's account. *Item 6* is not applicable to this Disclosure Brochure because I do not charge or accept performance-based fees.

## **Item 7 – Types of Clients**

Wilson Wealth Stewardship generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Pension and profit sharing plans
- Trusts
- Estates
- Corporations
- Charitable organizations

You are required to execute a written agreement with Wilson Wealth Stewardship specifying the particular advisory services in order to establish a client arrangement with Wilson Wealth Stewardship.

### **Minimum Investment Amounts Required**

There are no minimum investment amounts or conditions required for establishing an account managed by Wilson Wealth Stewardship. However, all clients are required to execute an agreement for services in order to establish a client arrangement with Wilson Wealth Stewardship and/or the third-party money manager or the sponsor of third-party money manager platforms.

Third-party money managers and Sub-Advisors may have minimum account and minimum fee requirements in order to participate in their programs. Each-third party money manager or Sub-Advisor will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure.

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

### **Methods of Analysis and Investment Strategies**

Wilson Wealth Stewardship exclusively offers advisory services by referring clients to a third-party money manager offering asset management and other investment advisory services. The third-party managers are responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

### **Primarily Recommend One Type of Security**

I do not primarily recommend one type of security to clients. Instead, I recommend any product that might be suitable for each client relative to that client's specific circumstances and needs.

### **Risk of Loss**

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there are varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, my firm is unable to represent, guarantee, or even imply that my services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through my investment management program, as described below:

- **Market Risk** – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- **Equity (stock) market risk** – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- **Company Risk**. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- **Fixed Income Risk**. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending

power. Fixed-income investors receive set, regular payments that face the same inflation risk.

- **Options Risk.** Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- **ETF and Mutual Fund Risk** – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- **Management Risk** – Your investment with my firm varies with the success and failure of my investment strategies, research, analysis and determination of portfolio securities. If my investment strategies do not produce the expected returns, the value of the investment will decrease.

### **Item 9 – Disciplinary Information**

*Item 9* is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of my business or integrity.

### **Item 10 – Other Financial Industry Activities and Affiliations**

Wilson Wealth Stewardship is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, an accountant or accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, and a sponsor or syndicator of limited partnerships.

I am an independent registered investment adviser and only provide investment advisory services. I am not engaged in any other business activities and offer no other services except those described in this Disclosure Brochure. However, while Wilson Wealth Stewardship does not sell products or services other than investment advice, D. Mark Wilson may sell other products or provide services outside of his role as investment adviser representatives with the firm.

#### **Third-Party Money Managers**

Wilson Wealth Stewardship has developed several programs, previously described in *Item 5* of this disclosure brochure, designed to allow me to recommend and select third-party money managers for you. Once you select the third-party money manager to manage all or a portion of your assets, the third-party money manager will pay me a portion of the fees you are charged. Please refer to *Items 4 and 5* for full

details regarding the programs, fees, conflicts of interest and materials arrangements when Wilson Wealth Stewardship selects other investment advisers.

### **Sub-Advisors**

As described in *Item 4 – Advisory Business* and *Item 5 – Fees and Compensation*, Wilson Wealth Stewardship has formed relationships with independent, investment advisers to serve as sub-advisors.

Wilson Wealth Stewardship can recommend clients work directly with third-party sub-advisors. When I refer clients to a third-party sub-advisor, you need to know that both firms will receive an asset management fee for the services they perform. Therefore, I have a conflict of interest because I only recommend sub-advisors that agree to enter in to a sub-advisor relationship in which Wilson Wealth Stewardship receives compensation as explained above.

### **Insurance Agent**

You may work with D. Mark Wilson in his separate capacity as an insurance agent. When acting in his separate capacity as an insurance agent, he is able to sell, for commissions, general disability insurance, life insurance, annuities, and other insurance products to you. As such, D. Mark Wilson in his separate capacity as an insurance agent, may suggest that you implement recommendations of Wilson Wealth Stewardship by purchasing disability insurance, life insurance, annuities, or other insurance products. This receipt of commissions creates an incentive (therefore a conflict of interest) for the representative to recommend those products for which your investment adviser representative will receive a commission in his or her separate capacity as an insurance agent. Consequently, the advice rendered to you could be biased. You are under no obligation to implement any insurance or annuity transaction through your investment adviser representative.

## **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

### **Code of Ethics Summary**

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. Wilson Wealth Stewardship has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. Wilson Wealth Stewardship's Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. Wilson Wealth Stewardship requires its supervised persons to consistently act in your best interest in all advisory activities. Wilson Wealth Stewardship imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of Wilson Wealth Stewardship. If you wish to review the Code of Ethics in its entirety, you should send me a written request and upon receipt of your request, I will promptly provide a copy of the Code of Ethics to you.

### **Affiliate and Employee Personal Securities Transactions Disclosure**

Wilson Wealth Stewardship or associated persons of the firm can buy or sell for their personal accounts, investment products identical to those recommended to clients. This creates a potential conflict of interest. It is the express policy of Wilson Wealth Stewardship that all persons associated in any manner with my firm must place clients' interests ahead of their own when implementing personal investments. Wilson Wealth Stewardship and its associated persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with my firm unless the information is also available to the investing public upon reasonable inquiry.

I am now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, I have developed written supervisory procedures that include personal investment and trading policies for my representatives, employees and their immediate family members (collectively, associated persons):

- Associated persons cannot prefer their own interests to that of the client.
- Associated persons cannot purchase or sell any security for their personal accounts prior to implementing transactions for client accounts.
- Associated persons cannot buy or sell securities for their personal accounts when those decisions are based on information obtained as a result of their employment, unless that information is also available to the investing public upon reasonable inquiry.
- Associated persons are prohibited from purchasing or selling securities of companies in which any client is deemed an "insider".
- Associated persons are discouraged from conducting frequent personal trading.
- Associated persons are generally prohibited from serving as board members of publicly traded companies unless an exception has been granted to the Chief Compliance Officer of Wilson Wealth Stewardship.

Any associated person not observing our policies is subject to sanctions up to and including termination.

### **Item 12 – Brokerage Practices**

#### **Brokerage Recommendations**

Wilson Wealth Stewardship exclusively offers asset management services by referring clients to sub-advisors and third-party money managers offering asset management and other investment advisory services. In Wilson Wealth Stewardship's sub-advisory relationships, the firm will monitor the client's account and place asset allocation transactions in the client accounts within the trading platform provided by the Sub-Advisor. In a third-party manager relationship, the third part manager is responsible for continuously monitoring client accounts and making trades in client accounts when necessary.

#### **Directed Brokerage**

Clients are required to utilize the broker-dealer selected by the unaffiliated sub-advisor/asset management firm providing the day-to-day services to the client.

### **Soft Dollar Benefits**

An investment adviser receives soft dollar benefits from a broker-dealer when the investment adviser receives research or other products and services in exchange for client securities transactions or maintaining an account balance with the broker-dealer.

Wilson Wealth Stewardship does not have a soft dollar agreement with a broker-dealer or a third-party.

### **Handling Trade Errors**

In our sub-advisor program Wilson Wealth Stewardship has implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with its fiduciary duty, it is the policy of Wilson Wealth Stewardship to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client is responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client is made whole and any loss resulting from the trade error is absorbed by Wilson Wealth Stewardship if the error is caused by Wilson Wealth Stewardship. If the error is caused by the broker-dealer, the broker-dealer is responsible for handling the trade error. If an investment gain results from the correcting trade, the gain remains in the client's account unless the same error involved other client account(s) that should also receive the gains. It is not permissible for all clients to retain the gain. Wilson Wealth Stewardship may also confer with a client to determine if the client should forego the gain (e.g., due to tax reasons).

Wilson Wealth Stewardship will never benefit or profit from trade errors.

### **Block Trading Policy**

Wilson Wealth Stewardship exclusively offers asset management services by referring clients to sub-advisors and third-party money managers offering asset management and other investment advisory services. Any block trading decisions are the responsibility of the subadvisor selected to manage the client's assets.

### **Agency Cross Transactions**

My associated persons are prohibited from engaging in agency cross transactions, meaning I cannot act as brokers for both the sale and purchase of a single security between two different clients and cannot receive compensation in the form of an agency cross commission or principal mark-up for the trades.

## **Item 13 – Review of Accounts**

### **Account Reviews and Reviewers**

Managed accounts are reviewed at least annually. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and



objectives review and making a change if strategy and objectives have changed. Reviews are conducted by D. Mark Wilson, with reviews performed in accordance with your investment goals and objectives.

Accounts established and maintained with other third-party money managers are reviewed at least annually, usually when statements and/or reports are received from the money manager.

Our financial consulting services do not include monitoring the investments of your account(s), and therefore, there is no ongoing review of your account(s) under such services.

### **Statements and Reports**

For my asset management services, you are provided with transaction confirmation notices and regular quarterly account statements in writing directly from the qualified custodian.

Whether reports by an outside money manager are provided to you will depend upon the outside money manager.

You are encouraged to always compare any reports or statements provided by me, a sub-advisor or third-party money manager against the account statements delivered from the qualified custodian. When you have questions about your account statement, you should contact my firm and the qualified custodian preparing the statement.

### **Item 14 – Client Referrals and Other Compensation**

Wilson Wealth Stewardship does not directly or indirectly compensate any person for client referrals.

The only compensation received from advisory services is the fees charged for providing investment advisory services as described in *Item 5* of this Disclosure Brochure. Wilson Wealth Stewardship receives no other forms of compensation in connection with providing investment advice.

Wilson Wealth Stewardship does not directly or indirectly compensate anybody for client referrals.

*Please see Item 5, Fees and Compensation, Item 10, Other Financial Industry Activities and Affiliations and Item 12, Brokerage Practices, for additional discussion concerning other compensation.*

### **Item 15 – Custody**

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

According to this definition, Wilson Wealth Stewardship does **not** have custody of client funds or securities.

### **Item 16 – Investment Discretion**

Client may grant Wilson Wealth Stewardship discretionary authority (without first consulting with Client) to establish and/or terminate a relationship with a Sub-Advisor for purposes of managing the Account or a portion of the Account determined by Wilson Wealth Stewardship. When client grants discretionary authority to establish or terminate a sub-Advisor relationship, client also grants the Sub-Advisor selected by Wilson Wealth Stewardship with the discretionary authority (in the sole discretion of the Sub-Advisor without first consulting with Client) to make all decisions to buy, sell or hold securities, cash or other investments for such portion of the Account managed by the Sub-Advisor. Client also grants the Sub-Advisor selected by Wilson Wealth Stewardship with the power and authority to carry out these decisions by giving instructions, on behalf of Client, to brokers and dealers and the qualified custodian(s) of the Account. Client authorizes Wilson Wealth Stewardship to provide a copy of this Agreement to the qualified custodian or any broker or dealer, through which transactions will be implemented on behalf of Client, as evidence of Sub-Advisor's authority under this Agreement.

### **Item 17 – Voting Client Securities**

Wilson Wealth Stewardship does not vote proxies on behalf of Clients. I have determined that taking on the responsibilities for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; I will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

With respect to assets managed by a third-party money manager, I will not vote the proxies associated with these assets. You will need to refer to each third-party money manager's disclosure brochure to determine whether the third-party money manager will vote proxies on your behalf. You may request a complete copy of third-party money manager's proxy voting policies and procedures as well as information on how your proxies were voted by contacting the third-party money manager or by contacting Wilson Wealth Stewardship at the address or phone number indicated on Page 1 of this disclosure document.

### **Item 18 – Financial Information**

This *Item 18* is not applicable to this brochure. Wilson Wealth Stewardship does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore, I am not required to include a balance sheet for the most recent fiscal year. I am not subject to a financial condition that is reasonably likely to impair my ability to meet contractual commitments to clients. Finally, Wilson Wealth Stewardship has not been the subject of a bankruptcy petition at any time.

## Item 19 – Requirements for State-Registered Advisers

### **Executive Officer and Management Personnel**

#### **D. Mark Wilson**

##### *Educational Background:*

Mercer University, Bachelor of Science in Engineering, Specialization Electrical: 1993  
Middle Georgia State University, Associate of Science, Mathematics: 1990

##### *Business Experience:*

Wilson Wealth Stewardship, Inc., President, 06/2018 to Present  
Christy Capital Management, EVP of Business Development, Financial Planner, 09/2009 to 06/2018

### **Other Business Activities**

See *Item 10 – Other Financial Industry Activities and Affiliations.*

### **No Performance Based Fees**

As previously disclosed in *Item 6*, Wilson Wealth Stewardship does not charge or accept performance-based fees.

### **No Arbitrations**

Wilson Wealth Stewardship or any of its associated persons have not been the subject of any client arbitrations or similar legal disputes.

### **No Arrangement with Issuer of Securities**

Wilson Wealth Stewardship and its management do not have any relationship or arrangement with any issuer of securities.

## **Business Continuity Plan**

Wilson Wealth Stewardship has a business continuity and contingency plan in place designed to respond to significant business disruptions. These disruptions can be both internal and external. Internal disruptions will impact my ability to communicate and do business, such as a fire in the office building. External disruptions will prevent the operation of the securities markets or the operations of a number of firms, such as earthquakes, wildfires, hurricanes, terrorist attack or other wide-scale, regional disruptions.

My continuity and contingency plan has been developed to safeguard employees' lives and firm property, to allow a method of making financial and operational assessments, to quickly recover and resume business operations, to protect books and records, and to allow clients to continue transacting business.

The plan includes the following:

- Alternate locations to conduct business;
- Hard and electronic back-ups of records;
- Alternative means of communications with employees, clients, critical business constituents and regulators; and
- Details on the firms' employee succession plan

My business continuity and contingency plan is reviewed and updated on a regular basis to ensure that the policies in place are sufficient and operational.

### **Customer Privacy Policy Notice**

In November of 1999, Congress enacted the Gramm-Leach-Bliley Act (GLBA). The GLBA requires certain financial institutions, such as investment advisor firms, to protect the privacy of customer information. In situations where a financial institution does disclose customer information to non-affiliated third parties, other than permitted or required by law, customers must be given the opportunity to opt out or prevent such disclosure. Wilson Wealth Stewardship does not share or disclose customer information to non-affiliated third parties except as permitted or required by law.

Wilson Wealth Stewardship is committed to safeguarding the confidential information of its clients. Wilson Wealth Stewardship holds all personal information provided by clients in the strictest confidence and it is the objective of Wilson Wealth Stewardship to protect the privacy of all clients. Except as permitted or required by law, Wilson Wealth Stewardship does not share confidential information about clients with non-affiliated parties. In the event that there were to be a change in this policy, Wilson Wealth Stewardship will provide clients with written notice and clients will be provided an opportunity to direct Wilson Wealth Stewardship as to whether such disclosure is permissible.

To conduct regular business, Wilson Wealth Stewardship may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to Wilson Wealth Stewardship
- Information about the client's transactions implemented by Wilson Wealth Stewardship or others
- Information developed as part of financial plans, analyses or investment advisory services

To administer, manage, service and provide related services for client accounts, it is necessary for Wilson Wealth Stewardship to provide access to customer information within the firm and to non-affiliated companies with whom Wilson Wealth Stewardship has entered into agreements. To provide the utmost service, Wilson Wealth Stewardship may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on Wilson Wealth Stewardship's behalf.

- Information Wilson Wealth Stewardship receives from the client on applications (name, Social Security number, address, assets, etc.)
- Information about the client's transactions with Wilson Wealth Stewardship or others (account information, payment history, parties to transactions, etc.)

- Information concerning investment advisory account transactions
- Information about a client's financial products and services transaction with Wilson Wealth Stewardship

Since Wilson Wealth Stewardship shares non-public information solely to service client accounts, Wilson Wealth Stewardship does not disclose any non-public personal information about Wilson Wealth Stewardship's customers or former customers to anyone, except as permitted by law. However, Wilson Wealth Stewardship may also provide customer information outside of the firm as required by law, such as to government entities, consumer reporting agencies or other third parties in response to subpoenas. In the event that Wilson Wealth Stewardship has a change to its customer privacy policy that would allow it to disclose non-public information not covered under applicable law, Wilson Wealth Stewardship will allow its clients the opportunity to opt out of such disclosure.

**FORM ADV PART 2B BROCHURE SUPPLEMENT - D. Mark Wilson**

**Item 1 – Cover Page**

D. Mark Wilson  
Wilson Wealth Stewardship, Inc.  
200 Corporate Center Drive, Suite B-1  
Stockbridge, GA 30281  
(470) 357-6900

Date of Supplement: February 2020

**This brochure supplement provides information about D. Mark Wilson that supplements the Wilson Wealth Stewardship, Inc. (“Wilson Wealth Stewardship”) disclosure brochure. You should have received a copy of that brochure. Please contact D. Mark Wilson at (470) 357-6900 or at [mark@wilsonws.com](mailto:mark@wilsonws.com) if you did not receive Wilson Wealth Stewardship’s brochure or if you have any questions about the contents of this supplement.**

**Additional information about D. Mark Wilson is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Item 2 – Educational Background and Business Experience**

**D. Mark Wilson**

Born 1969, CRD # 5921127

***Post-Secondary Educational Background:***

Mercer University, Bachelor of Science in Engineering, Specialization Electrical: 1993  
Middle Georgia State University, Associate of Science, Mathematics: 1990

***Business Background:***

Wilson Wealth Stewardship, Inc., President, 06/2018 to Present  
Christy Capital Management, EVP of Business Development, Financial Planner, 09/2009 to 06/2018

**Item 3 – Disciplinary Information**

D. Mark Wilson has no legal or disciplinary events to report.

**Item 4 – Other Business Activities**

**Insurance Agent**

D. Mark Wilson is independently licensed to sell insurance and annuity products through various insurance companies. When acting in this capacity, D. Mark Wilson will receive commissions for selling insurance and annuity products.

As an independently licensed insurance agent, D. Mark Wilson has the ability to receive other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of compensation and other incentive benefits can affect the judgment of D. Mark Wilson when recommending products to its clients. While D. Mark Wilson endeavors at all times to put the interest of his clients first as a part of Wilson Wealth Stewardship's overall fiduciary duty to clients, clients should be aware that the receipt of commissions and additional compensation itself creates a conflict of interest and can have an effect on D. Mark Wilson's decision making process when making recommendations.

Clients are never obligated or required to purchase insurance products from or through D. Mark Wilson and are able to choose any independent insurance agent and insurance company to purchase insurance products. Regardless of the insurance agent selected, the insurance agent or agency will receive normal commissions from the sale.

#### **Item 5 – Additional Compensation**

In addition to the description of additional compensation provided in Item 4, D. Mark Wilson can receive additional benefits.

Certain product sponsors can provide D. Mark Wilson with other economic benefits as a result of his recommendation or sale of the product sponsors' investments. The economic benefits received by D. Mark Wilson from product sponsors can include but are not limited to, financial assistance or the sponsorship of conferences and educational sessions, marketing support, incentive awards, payment of travel expenses, and tools to assist D. Mark Wilson in providing various services to clients.

Although Wilson Wealth Stewardship and D. Mark Wilson endeavor at all times to put the interest of its clients ahead of its own or those of its officers, directors, or representatives ("affiliated persons"), these arrangements could affect the judgment of D. Mark Wilson when recommending investment products. These situations present a conflict of interest that can affect the judgment of affiliated persons including D. Mark Wilson.

#### **Item 6 – Supervision**

D. Mark Wilson is the Chief Compliance Officer of Wilson Wealth Stewardship. He is responsible for overseeing and enforcing the firm's compliance programs that have been established to monitor and supervise the activities and services provided by the firm and its representatives. D. Mark Wilson can be contacted at (470) 357-6900.

#### **Item 7 – Requirements for State-Registered Advisers**

D. Mark Wilson has not been involved in an arbitration award and has not been found liable in an arbitration claim alleging damages in excess of \$2,500. He has not been involved in any award or found liable in any civil, self-regulatory organization, or administrative proceeding. Additionally, he has not been the subject of a bankruptcy petition.