

LeConte Wealth Management, LLC

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FORM ADV PART 2A DISCLOSURE BROCHURE

This brochure provides information about the qualifications and business practices of LeConte Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 865-379-8200. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about LeConte Wealth Management, LLC. is available on the SEC's website at www.adviserinfo.sec.gov.

LeConte Wealth Management, LLC. is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Material Changes

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated February 1, 2021, we had the following material changes:

- Added our stand-alone service of Tax Preparation
- Clarified our billing method for Advisory Consulting Services. Please refer to Items 4 and 5 below for more detailed information.
- Updated our ADV to include participation in the CARES Act. Please refer to <u>Item 18</u> below for more detailed information.
- As previously reported under the Financial Information section, we disclosed the firm received a
 Paycheck Protection Program ("PPP") loan through the U.S. Small Business Administration,
 which was part of the economic relief provided under the Coronavirus Aid, Relief, and
 Economic Security (CARES) Act to support our ongoing operations. The loan was forgiven on
 5/5/2021; therefore, the disclosure has been removed from Item 18.
- Added disclosures regarding IRA Rollover Recommendations. Please refer to <u>Item 4</u> below for more detailed information.

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Item 4 Advisory Business

Description of Services and Fees

LeConte Wealth Management, LLC is a registered investment adviser based in Maryville, Tennessee. We are organized as a limited liability company under the laws of the State of Tennessee. We have been providing investment advisory services since 2013. Kevin Painter, Hoy Grimm, and Jonathan Keith Dockery are our principal owners. Currently, we offer the following investment advisory services, which are personalized to each individual client:

- Discretionary Asset Management Services
- Comprehensive Wealth Management Services
- · Advisory Consulting Services

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "we", "our", "advisor" and "us" refer to LeConte Wealth Management, LLC and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm.

Discretionary Asset Management Services

We offer discretionary asset management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for asset management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. As part of our asset management services, we may customize an investment portfolio for you according to your risk tolerance and investing objectives. We may also invest your assets according to one or more model portfolios developed by our firm. Once we construct an investment portfolio for you, or select a model portfolio, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

We require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account and the commissions to be paid to brokerage firms without your approval prior to each transaction. Discretionary authority is granted by the investment advisory agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

As part of our discretionary asset management services we may provide asset allocation modeling and investment recommendations to participants in qualified plans. The advice and/or recommendations rendered by our firm will be based on information received from you, which may include your investment objectives, projected retirement age, account balance, and risk tolerance, among others. Given the information received from the participant, the investments available in this participant's plan, and past and expected market performance, we will recommend a model portfolio. The model portfolio consists of a combination of investments available to, and appropriate for, the participant in achieving his/her investment goals and objectives. You as a retirement plan Participant, hereby appoint and retain us to act as an investment adviser, as defined under the Investment Advisers Act of 1940, as amended. We acknowledge that we are a functional investment fiduciary with respect to this

Participant only, as defined in regulations issued by the U.S. Department of Labor at 29 CFR 2510.3-21(c) under ERISA, to the extent that the plan is subject to ERISA and the Participant relies on our investment advice.

Comprehensive Wealth Management

Our comprehensive wealth management services include discretionary asset management services as discussed above plus financial planning and tax planning services. Our wealth management services are provided based upon two service levels: Value and Premium. The highlights of each are listed below:

1. Value

We provide you with a comprehensive and detailed written financial plan including allocation of outside investments, retirement income planning and budgeting. We also provide discretionary asset management for client assets as described above. We will provide access to a personalized online planning portal where we can assist you in aggregating your up-to-date financial information, offer you cash flow monitoring and budgeting tools as well as a secure digital vault. We will meet with you semi-annually to review your plan and progress. This level also includes tax preparation and an annual tax planning meeting.

Financial plans are based on your financial situation at the time we present the plan to you, and on the financial information you provide to us. You must promptly notify our firm if your financial situation, goals, objectives, or needs change.

2. Premium

Our Premium planning services includes all of the features of the Value engagement and offers quarterly meetings with your Advisor. All facets of wealth are addressed including estate planning, insurance planning, education planning, and tax planning and asset allocation.

Advisory Consulting Services

We offer consulting services that primarily involves advising clients on specific financial-related topics. The topics we address may include, but are not limited to, risk assessment/management, investment planning, financial organization, family philanthropy, integrated tax and financial planning or financial decision making/negotiation.

You are under no obligation to act on our financial planning recommendations. Should you choose to act on any of our recommendations, you are not obligated to implement the financial plan through any of our other investment advisory services. Moreover, you may act on our recommendations by placing securities transactions with any brokerage firm.

Tax Preparation Only

The completion of Federal and State returns as required after the gathering of relevant financial information.

Types of Investments

Although we primarily offer advice on mutual funds, ETFs, and corporate debt securities (or bonds), we offer advice on all types of investments including any investments we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request that we refrain from investing in particular securities or certain types of securities. You must provide these restrictions to our firm in writing.

IRA Rollover Recommendations

Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest:
- · Charge no more than is reasonable for our services; and
- · Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase our assets under management and, in turn, our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

Assets Under Management

As of December 31, 2021, we provide continuous management services for \$225,280,243 in client assets on a discretionary basis and \$1,557,240 in client assets on a non-discretionary basis.

Item 5 Fees and Compensation

Discretionary Asset Management Services

Our fee for asset management services is based on a percentage of your assets we manage and is set forth in the following blended fee schedule:

Assets Under Management	Annualized Fee
First \$500,000	1.50%
Next \$500,000	1.25%
Next \$1,000,000	1.10%
Next \$3,000,000	1.00%
Amounts above \$5,000,000	0.90%

^{*}Our minimum fee requirement and account size is \$2,000 and \$500,000 respectively and may be waived at our sole discretion.

Our annual asset management fee is billed and payable quarterly in advance based on the value of your account on the last day of the quarter. If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a

client. Our advisory fee is negotiable, depending on individual client circumstances. At our discretion, we may combine the account values of family members living in the same household to meet the minimum account size. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts.

We will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy.

Comprehensive Wealth Management Services

Your initial consultation for comprehensive wealth management services will be complimentary for up to an hour. Thereafter, we charge an annual fee for either the value or premium level service plan, which generally ranges between \$2,500 to \$15,000. The fee is negotiable depending upon the complexity and scope of the plan, your financial situation, and your objectives. Fixed fees are payable to the firm quarterly and due in advance of services rendered with the remaining balance payable upon completion of the contracted services. We do not require you to pay fees six or more months in advance and in excess of \$1,200. Should the engagement last longer than six months between acceptance of the Agreement and delivery of the financial plan, any prepaid, unearned fees will be promptly returned to you less a pro rata charge for bona fide financial planning services rendered to date.

Advisory Consulting Services

We charge an hourly fee of \$250 for advisory consulting services, which is negotiable depending on the scope and complexity of the plan, your situation, and your financial objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship to include a two (2) hour minimum. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we will notify you and request that you approve the additional fee. Fees are billed monthly, and are payable as services are rendered.

Tax Preparation Only

Our stand-alone tax preparation service fees are based on an hourly rate of \$250 with a typical return taking 2 to 3 hours depending on the scope and complexity of the return. An estimate of the total time/cost will be determined at the start of the tax season. Our tax preparation fees are:

- 1) effective upon execution of the Agreement,
- 2) renewable annually, and
- 3) payable in advance.

Termination

You may terminate your Agreement with us upon 30-days' written notice to our firm. You will incur a pro rata charge for services rendered prior to the termination of the Agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on

our behalf have an incentive to recommend a rollover to you for the purpose of generating fee based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:

- 1. Leaving the funds in your employer's (former employer's) plan.
- 2. Moving the funds to a new employer's retirement plan.
- 3. Cashing out and taking a taxable distribution from the plan.
- 4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

- 1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
 - a. Employer retirement plans generally have a more limited investment menu than IRAs.
 - b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
- 2. Your current plan may have lower fees than our fees.
 - a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
 - b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
- 3. Our strategy may have higher risk than the option(s) provided to you in your plan.
- 4. Your current plan may also offer financial advice.
- 5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 72.
- 6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
 - a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
- 7. You may be able to take out a loan on your 401k, but not from an IRA.
- 8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
- 9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
- 10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the *Brokerage Practices* section of this brochure.

Compensation for the Sale of Securities or Other Investment Products

Persons providing investment advice on behalf of our firm may be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. You are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

At our sole discretion, we may offset our advisory fees to the extent persons associated with our firm earn commissions in their separate capacities as insurance agents.

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

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, corporate, and charitable organizations. In general, our minimum fee requirement and account size is \$2,000 and \$500,000 respectively and may be waived at our sole discretion. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management.

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

Our Methods of Analysis and Investment Strategies

We will use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Charting Analysis - involves the gathering and processing of price and volume pattern information for a particular security, sector, broad index or commodity. This price and volume pattern information is analyzed. The resulting pattern and correlation data is used to detect departures from expected performance and diversification and predict future price movements and trends.

Risk: Our charting analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Technical Analysis - involves studying past price patterns, trends, and interrelationships in the financial markets to assess risk-adjusted performance and predict the direction of both the overall market and specific securities.

Risk: The risk of market timing based on technical analysis is that our analysis may not accurately detect anomalies or predict future price movements. Current prices of securities may reflect all information known about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company and its industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.

Risk: The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Cyclical Analysis - a type of technical analysis that involves evaluating recurring price patterns and trends. Economic/business cycles may not be predictable and may have many fluctuations between long term expansions and contractions.

Risk: The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

We may use long-term purchases, short-term purchases, short-term trading, and/or margin transactions as investment strategies when managing your account(s). None of these strategies are a fundamental part of our overall investment strategy, but we may use one or more occasionally when we determine that they are suitable given your stated investment objectives and tolerance for risk.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As disclosed under the *Advisory Business* section in this brochure, we primarily recommend mutual funds, ETFs, and corporate debt securities (or bonds). Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with that investment.

Mutual Funds and ETFs: Mutual funds and exchange traded funds (ETFs) are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Item 9 Disciplinary Information

LeConte Wealth Management, LLC has been registered and providing investment advisory services since 2013. Neither our firm nor any of our management persons has any reportable disciplinary information.

Item 10 Other Financial Industry Activities and Affiliations

Licensed Insurance Agents

Persons providing investment advice on behalf of our firm are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate from our advisory fees. Please see the *Fees and Compensation* section in this brochure for more information on the compensation received by insurance agents who are affiliated with our firm.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

We maintain relationships with several broker-dealers. While you are free to choose any broker-dealer or other service provider as your custodian, we recommend that you establish an account with a brokerage firm or custodian, like Charles Schwab for example, with which we have an existing relationship. Such relationships may include benefits provided to our firm, including but not limited to market information and administrative services that help our firm manage your account(s). We believe that the recommended broker-dealers provide quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by recommended broker-dealers, including the value of the firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our firm. In recognition of the value of the services recommended broker-dealers provide, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

Advisor participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC/NFA ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the Program.

As disclosed above, Advisor participates in TD Ameritrade's institutional customer program and Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Research and Other Soft-Dollar Benefits

We do not have any soft dollar arrangements. The research products and services that our firm might receive from brokerage firms (e.g. TD Ameritrade, among others) may include financial publications, information about particular companies and industries, and other products or services that provide lawful and appropriate assistance to the Firm in the performance of its investment decision-making responsibilities. Such research products and services provided to all investment advisers who utilize

TD Ameritrade, and not considered paid for with soft dollars. However, the commissions charged by a particular broker for a particular transaction, or set of transactions, might be greater than the amounts another broker who did not provide research services or products might charge.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Block Trades

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13 Review of Accounts

Discretionary Asset Management Services

Kevin Painter (Managing Member), Hoy Grimm (Managing Member), and/or Jonathan K. Dockery (Managing Member) of LeConte Wealth Management, LLC will monitor your accounts on an ongoing basis and will conduct formal account reviews at least annually to ensure the advisory services provided to you, and the portfolio mix, are consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- · market moving events,
- · security specific events, and/or,
- changes in your risk/return objectives.

We will provide you with additional or regular written reports accessible online via a client portal. Reports we provide to you will contain relevant account and/or market-related information such as an inventory of account holdings and account performance. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

Comprehensive Wealth Management

For the "value" level service plan we will meet with you semi-annually to review your plan and progress. For the "premium" level service plan we will meet with you quarterly to review your plan and progress.

Item 14 Client Referrals and Other Compensation

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Please refer to the *Brokerage Practices* section above for disclosures on research and other benefits we may receive resulting from our relationship with TD Ameritrade.

As disclosed under the *Fees and Compensation* section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the *Fees and Compensation* section.

Item 15 Custody

Your independent custodian will directly debit your account(s) for the payment of our advisory fees when you specifically authorize us to do so. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Item 16 Investment Discretion

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, and the appropriate trading authorization forms. You must grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

Item 17 Voting Client Securities

Without exception, we will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Item 18 Financial Information

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

Item 19 Requirements for State-Registered Advisers

LeConte Wealth Management, LLC is an SEC-registered adviser; hence this requirement is not applicable.

Item 20 Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.

For accounts custodied at TD Ameritrade, as of April 1, 2014, if a profit results from correcting the trade, you will not retain the profit as all net gains (positive error accounts balances resulting from trade corrections) will be moved to a TD Ameritrade error account and subsequently donated to charity.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit. Moreover, we do not determine whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf.



Kevin Painter

LeConte Wealth Management, LLC

703 William Blount Drive Maryville, TN 37801

Telephone: 865-379-8200 Facsimile: 865-379-8045

www.lecontewealth.com

March 31, 2022

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Kevin Painter that supplements the LeConte Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact us at 865-379-8200 if you did not receive LeConte Wealth Management, LLC 's brochure or if you have any questions about the contents of this supplement.

Additional information about Kevin Painter is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Kevin Painter

Year of Birth: 1975

Education:

- University of Tennessee, MBA with concentration in Finance, 1999
- Furman University, BA, Political Science and Music, 1997

Business Background:

- LeConte Wealth Management, LLC, Co-Founder, Managing Member, 03/2007 to Present
- Commonwealth Financial Network, 03/2007 to 09/2013

Item 3 Disciplinary Information

Kevin Painter does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Kevin Painter is separately licensed as an independent insurance agent. In this capacity, he can effect transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Painter for insurance related activities. This presents a conflict of interest because Mr. Painter may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm.

Item 5 Additional Compensation

Please refer to the *Other Business Activities* section above for disclosures on Mr. Painter's receipt of additional compensation as a licensed insurance agent.

Also, please refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of LeConte Wealth Management, LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

Hoy Grimm, Managing Member of LeConte Wealth Management, LLC, is responsible for supervising the advisory activities of Kevin Painter.

Hoy Grimm can be reached at 865-379-8200. In the supervision of our associated persons, advice provided is limited based on the restrictions set by LeConte Wealth Management, LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Item 7 Requirements for State Registered Advisers

LeConte Wealth Management, LLC is an SEC-registered adviser; hence this requirement is not applicable.



Hoy Carter Grimm

LeConte Wealth Management, LLC 703 William Blount Drive Maryville, TN 37801

Telephone: 865-379-8200 Facsimile: 865-379-8045

www.lecontewealth.com

March 25, 2022

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Hoy C. Grimm that supplements the LeConte Wealth Management, LLC brochure. You should have received a copy of that brochure. Please contact us at 865-379-8200 if you did not receive LeConte Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Hoy C. Grimm is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Hoy C. Grimm

Year of Birth: 1964

Education:

Tennessee Tech. 08/1982 to 05/1985

Business Background:

- LeConte Wealth Management, LLC, Founder, Managing Member, 03/2007 to Present
- Commonwealth Financial Network, Registered Representative, 03/2007 to 09/2013

Item 3 Disciplinary Information

Hoy C. Grimm does not have, nor has he ever had, any disciplinary disclosure.

Item 4 Other Business Activities

Hoy C. Grimm is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Managing Member of LeConte Wealth Management, LLC.

Item 5 Additional Compensation

Hoy C. Grimm does not receive any additional compensation for providing advisory services beyond that received as a result of his capacity as Managing Member of LeConte Wealth Management, LLC.

Also, please refer to the *Fees and Compensation* section and the *Client Referrals and Other Compensation* section of LeConte Wealth Management, LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

Kevin Painter, Chief Compliance Officer and Managing Member of LeConte Wealth Management, LLC is responsible for supervising the advisory activities of Hoy C. Grimm.

Kevin Painter can be reached at 865-379-8200. In the supervision of our associated persons, advice provided is limited based on the restrictions set by LeConte Wealth Management, LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.

Item 7 Requirements for State Registered Advisers

LeConte Wealth Management, LLC is an SEC-registered adviser; hence this requirement is not applicable.



Jonathan K. Dockery

LeConte Wealth Management, LLC

703 William Blount Drive Maryville, TN 37801

Telephone: 865-379-8200 Facsimile: 865-379-8045

January 25, 2022

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Jonathan K. Dockery that supplements the LeConte Wealth Management, LLC brochure. You should have received a copy of that brochure. Contact us at 865-379-8200 if you did not receive LeConte Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan K. Dockery is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Jonathan K. Dockery

Year of Birth: 1974

Formal Education After High School:

- Auburn University, BS, Business Administration-Accounting, 1997
- University of Tennessee, MA, Accounting-Taxation, 1998

Business Background:

- LeConte Wealth Management, LLC, Managing Member, 01/2019 Present
- LeConte Wealth Management, LLC, Investment Adviser Representative, 01/2015 Present
- Jonathan K. Dockery, CPA, PLLC, Partner, Owner, 12/2014 Present
- Ingram, Overholt & Bean, P.C., CPA, 11/2008 12/2014
- Faulkner Mackie & Cochran, Manager, 01/2005 11/2008

Certifications: CPA

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

Item 3 Disciplinary Information

Mr. Dockery does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Jonathan Dockery is a certified public accountant ("CPA") with Jonathan K. Dockery, CPA, PLLC, a certified public accounting firm, and is also principal of Jonathan K. Dockery, CPA, PLLC. Jonathan Dockery may provide accounting and/or tax preparation services to advisory clients independent of LeConte Wealth Management, LLC. Although LeConte Wealth Management, LLC does not receive referral fees from Jonathan K. Dockery, CPA, PLLC, Jonathan Dockery is entitled to receive compensation relative to his employment with Jonathan K. Dockery, CPA, PLLC.

Jonathan Dockery devotes 15% of his professional time to his accountancy practice.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Dockery's receipt of additional compensation as a result of his other business activities.

Also, refer to the Fees and Compensation, Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations sections of LeConte Wealth Management, LLC's firm brochure for additional disclosures on this topic.

Item 6 Supervision

Kevin Painter, Chief Compliance Officer and Managing Member of LeConte Wealth Management, LLC is responsible for supervising the advisory activities of Jonathan Dockery.

Kevin Painter can be reached at 865-379-8200. In the supervision of our associated persons, advice provided is limited based on the restrictions set by LeConte Wealth Management, LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines



Alexander Logan Willard LeConte Wealth Management, LLC

703 William Blount Drive Maryville, TN 37801

Telephone: 865-379-8200 Facsimile: 865-379-8045

February 22, 2022

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Alexander Logan Willard that supplements the LeConte Wealth Management, LLC brochure. You should have received a copy of that brochure. Contact us at 865-379-8200 if you did not receive LeConte Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Alexander Logan Willard (CRD# 6959937) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Alexander Logan Willard

Year of Birth: 1994

Formal Education After High School:

Maryville College, BA Finance/Accounting, 2017

Business Background:

- LeConte Wealth Management, LLC, Investment Adviser Representative, 8/2018 Present
- LeConte Wealth Management, Planning Associate, 11/2017 Present
- LeConte Wealth Management, Tax & Accounting Intern, 12/2016 5/2017
- Home Federal Bank, Teller, 5/2016 7/2016
- 21st Mortgage, Financial Counselor, 5/2015 7/2015

Item 3 Disciplinary Information

Mr. Willard does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Alexander Logan Willard is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as an Investment Adviser Representative of LeConte Wealth Management, LLC. Moreover, Mr. Willard does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Alexander Logan Willard does not receive any additional compensation beyond that received as an Investment Adviser Representative of LeConte Wealth Management, LLC.

Item 6 Supervision

Kevin Painter, Chief Compliance Officer and Managing Member of LeConte Wealth Management, LLC is responsible for supervising the advisory activities of Alexander Willard.

Kevin Painter can be reached at 865-379-8200. In the supervision of our associated persons, advice provided is limited based on the restrictions set by LeConte Wealth Management, LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines.



Wes McNeillie

LeConte Wealth Management, LLC

703 William Blount Drive Maryville, TN 37801

Telephone: 865-379-8200 Facsimile: 865-379-8045

February 2, 2022

FORM ADV PART 2B BROCHURE SUPPLEMENT

This brochure supplement provides information about Wes McNeillie that supplements the LeConte Wealth Management, LLC brochure. You should have received a copy of that brochure. Contact us at 865-379-8200 if you did not receive LeConte Wealth Management, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Wes McNeillie (CRD # 6569011) is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Wes McNeillie, CFP®

Year of Birth: 1993

Formal Education After High School:

- The University of Tennessee Knoxville, BS, Finance, 2015
- The University of Tennessee Chattanooga, MBA Business Administration, 2017 Business Background:
 - LeConte Wealth Management, LLC, Tax and Planning Specialist, 1/2022 Present
 - Southwestern Investment Group, Certified Financial Planner, 8/2021 12/2021
 - Prudent Street Financial Advisors, Investment Operations Associate, 1/2018 6/2021
 - UBS. Integrated Middle Office Specialist. 9/2017 12/2017
 - The University of Tennessee Chattanooga, Student, 8/2015 8/2017

Certifications: CFP®

CERTIFIED FINANCIAL PLANNER™ (CFP®)

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP[®] professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). CFP[®] certification is voluntary. No federal or state law or regulation requires financial planners to hold CFP[®] certification. You may find more information about CFP[®] certification at www.cfp.net.

CFP[®] professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP[®] professional, an individual must fulfill the following requirements:

Education - Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.

Examination - Pass the comprehensive CFP[®] Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

Experience - Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.

Ethics - Satisfy the Fitness Standards for Candidates for CFP[®] Certification and Former CFP[®] Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

Ethics - Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP[®] professional who does not abide by this commitment, but CFP Board does not guarantee a CFP[®] professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client. **Continuing Education** - Complete 30 hours of continuing education hours every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

Item 3 Disciplinary Information

Mr. McNeillie does not have any reportable disciplinary disclosure.

Item 4 Other Business Activities

Wes McNeillie is not actively engaged in any other business or occupation (investment-related or otherwise) beyond his capacity as Tax and Planning Specialist of LeConte Wealth Management, LLC. Moreover, Mr. McNeillie does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

Item 5 Additional Compensation

Wes McNeillie does not receive any additional compensation beyond that received as an Tax and Planning Specialist of LeConte Wealth Management, LLC.

Item 6 Supervision

Kevin Painter, Chief Compliance Officer and Managing Member of LeConte Wealth Management, LLC is responsible for supervising the advisory activities of Wes McNeillie.

Kevin Painter can be reached at 865-379-8200. In the supervision of our associated persons, advice provided is limited based on the restrictions set by LeConte Wealth Management, LLC, and by internal decisions as to the types of investments that may be included in client portfolios. We conduct periodic reviews of client holdings and documented suitability information to provide reasonable assurance that the advice provided remains aligned with each client's stated investment objectives and with our internal guidelines

Privacy Policy Notice

LeConte Wealth Management, LLC

LeConte Wealth Management, LLC has adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that you expect us to service you in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about you. We want you to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about you (such as your name, address, social security number, etc.) from information that you provide on applications or other forms as well as communications (electronic, telephone, written or in person) with you or your authorized representatives (such as your attorney, accountant, etc.). We also collect information about your brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship with them and then only to those persons necessary to effect the transactions and provide the services that they authorize (such as broker-dealers, custodians, independent managers etc.); (ii) to persons assessing our compliance with industry standards (e.g., professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law.

We are permitted by law to disclose the nonpublic personal information about you to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any other purpose. If you decide at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Your Information

We restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.

Changes to Our Privacy Policy

Our policy about obtaining and disclosing information may change from time to time. We will provide you notice of any material change to this policy before we implement the change.

Questions:

If you have questions about this privacy policy, or if you wish to amend or rescind your written instructions below at any time, please call Kevin Painter, Chief Compliance Officer at 865-379-8200.