

DISCLOSURE DOCUMENT

ADV Parts IA, 2A and 2B  
and  
Privacy Policy



WINGATE WEALTH ADVISORS, INC.  
450 BEDFORD STREET  
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WWW.WINGATEWEALTHADVISORS.COM -- WEBSITE

**March 13, 2017**

This brochure provides information about the qualifications and business practices of Wingate Wealth Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at (781) 862-7100 or at [mark.greco@wingatewealthadvisors.com](mailto:mark.greco@wingatewealthadvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Wingate Wealth Advisors, Inc. is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

References herein to Wingate Wealth Advisors, Inc. as a "registered investment advisor" or any reference to being "registered" does not imply a certain level of skill or training.

# FORM ADV (Paper Version)

## • UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND • REPORT BY EXEMPT REPORTING ADVISERS

### PART 1A

**WARNING:** Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

Check the box that indicates what you would like to do (check all that apply):

SEC or State Registration:

- Submit an initial application to register as an investment adviser with the SEC.
- Submit an initial application to register as an investment adviser with one or more states.
- Submit an *annual updating amendment* to your registration for your fiscal year ended December 31, 2016.
- Submit an other-than-annual amendment to your registration.

SEC or State Report by Exempt Reporting Advisers:

- Submit an initial report to the SEC.
- Submit a report to one or more *state securities authorities*.
- Submit an *annual updating amendment* to your report for your fiscal year ended \_\_\_\_\_.
- Submit an other-than-annual amendment to your report.
- Submit a final report.

### Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):

Wingate Wealth Advisors, Inc.

B. Name under which you primarily conduct your advisory business, if different from Item 1.A.

Wingate Wealth Advisors, Inc.

*List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.*

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.), enter the new name and specify whether the name change is of  your legal name or  your primary business name:

\_\_\_\_\_

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: 801- 28664.

(2) If you report to the SEC as an exempt reporting adviser, your SEC file number: 802- \_\_\_\_\_.

E. If you have a number ("CRD Number") assigned by the *FINRA's CRD* system or by the *IARD* system, your *CRD* number: 105012

Your Name Wingate Wealth Advisors, Inc.

CRD Number 105012

Date March 13, 2017

SEC 801- or 802 Number 80128664

*If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.*

F. *Principal Office and Place of Business*

(1) Address (do not use a P.O. Box):

450 Bedford Street

(number and street)

Lexington

MA

02420-1547

(city)

(state/country)

(zip+4/postal code)

If this address is a private residence, check this box:

*List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest five offices in terms of numbers of employees.*

(2) Days of the week that you normally conduct business at your *principal office and place of business*:

Monday - Friday  Other: \_\_\_\_\_

Normal business hours at this location: 8:30 am to 5:00 pm

(3) Telephone number at this location: 781-862-7100

(area code) (telephone number)

(4) Facsimile number at this location: 781-861-9707

(area code) (facsimile number)

G. Mailing address, if different from your *principal office and place of business* address:

\_\_\_\_\_  
(number and street)

\_\_\_\_\_  
(city)

\_\_\_\_\_  
(state/country)

\_\_\_\_\_  
(zip+4/postal code)

If this address is a private residence, check this box:

H. If you are a sole proprietor, state your full residence address, if different from your *principal office and place of business* address in Item 1.F.:

\_\_\_\_\_  
(number and street)

\_\_\_\_\_  
(city)

\_\_\_\_\_  
(state/country)

\_\_\_\_\_  
(zip+4/postal code)

Your Name Wingate Wealth Advisors, Inc.

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Date March 13, 2017

SEC 801- or 802 Number 80128664

- I. Do you have one or more websites? Yes  No

*If "yes," list all website addresses on Section 1.I. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. Some advisers may need to list more than one portal address. Do not provide individual electronic mail (e-mail) addresses in response to this Item.*

- J. Provide the name and contact information of your Chief Compliance Officer: If you are an *exempt reporting adviser*, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Jeffrey H. White

(name)

Chief Compliance Officer

(other titles, if any)

781-862-7100

781-861-9707

(area code) (telephone number)

(area code) (facsimile number)

Wingate Wealth Advisors, Inc., 450 Bedford Street

(number and street)

Lexington

MA

02420-1547

(city)

(state/country)

(zip+4/postal code)

[jeff.white@wingatewealthadvisors.com](mailto:jeff.white@wingatewealthadvisors.com)

(electronic mail (e-mail) address, if Chief Compliance Officer has one)

- K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.

Mark F. Greco

(name)

Chief Executive Officer / Compliance Officer

(titles)

781-862-7100

781-861-9707

(area code) (telephone number)

(area code) (facsimile number)

Wingate Wealth Advisors, Inc., 450 Bedford Street

(number and street)

Lexington

MA

02420-1547

(city)

(state/country)

(zip+4/postal code)

[mark.greco@wingatewealthadvisors.com](mailto:mark.greco@wingatewealthadvisors.com)

(electronic mail (e-mail) address, if contact person has one)

- L. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your *principal office and place of business*?

Yes  No

*If "yes," complete Section 1.L of Schedule D.*

Your Name Wingate Wealth Advisors, Inc.

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- M. Are you registered with a *foreign financial regulatory authority*? Yes  No

*Answer "no" if you are not registered with a foreign financial regulatory authority, even if you have an affiliate that is registered with a foreign financial regulatory authority. If "yes," complete Section I.M. of Schedule D.*

- N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934? Yes  No

If "yes," provide your CIK number (Central Index Key number that the SEC assigns to each public reporting company): \_\_\_\_\_

- O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year? Yes  No

- P. Provide your *Legal Entity Identifier* if you have one: \_\_\_\_\_

*A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. In the first half of 2011, the legal entity identifier standard was still in development. You may not have a legal entity identifier.*

## Item 2

### SEC Registration

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration.

- A. To register (or remain registered) with the SEC, you must check **at least one** of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

- (1) are a **large advisory firm** that either:

- (a) has regulatory assets under management of \$100 million (in U.S. dollars) or more, or
- (b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent *annual updating amendment* and is registered with the SEC;

- (2) are a **mid-sized advisory firm** that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:

- (a) not required to be registered as an adviser with the *state securities authority* of the state where you maintain your *principal office and place of business*, or

(b) not subject to examination by the *state securities authority* of the state where you maintain your *principal office and place of business*;

Click **HERE** for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.

- (3) have your *principal office and place of business in Wyoming* (which does not regulate advisers);
- (4) have your *principal office and place of business outside the United States*;
- (5) are **an investment adviser (or sub-adviser) to an investment company** registered under the Investment Company Act of 1940;
- (6) are **an investment adviser to a company which has elected to be a business development company** pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;
- (7) are a **pension consultant** with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
- (8) are a **related adviser** under rule 203A-2(b) that *controls*, is *controlled* by, or is under common *control* with, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;

*If you check this box, complete Section 2.A.(8) of Schedule D.*

- (9) are a **newly formed adviser** relying on rule 203A-2(c) because you expect to be eligible for SEC registration within 120 days;

*If you check this box, complete Section 2.A.(9) of Schedule D.*

- (10) are a **multi-state adviser** that is required to register in 15 or more states and is relying on rule 203A-2(d);

*If you check this box, complete section 2.A.(10) of Schedule D.*

- (11) are an **Internet adviser** relying on rule 203A-2(e);
- (12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;

*If you check this box, complete Section 2.A.(12) of Schedule D.*

- (13) are **no longer eligible** to remain registered with the SEC.

### SEC Reporting by *Exempt Reporting Advisers*

B. Complete this Item 2.B. only if you are reporting to the SEC as an *exempt reporting adviser*. Check all that apply. You:

- (1) qualify for the exemption from registration as an adviser solely to one or more venture capital funds;

- (2) qualify for exemption from registration because you act solely as an adviser to *private funds* and have assets under management in the United States of less than \$150 million;
- (3) act solely as an adviser to *private funds* but you are no longer eligible to check box 2.B.(2) because you have assets under management in the United States of \$150 million or more.

*If you check this box (2) or (3), complete Section 2.B. of Schedule D.*

**State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers**

C. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. In addition, *exempt reporting advisers* may be required to provide *state securities authorities* with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

- |                             |                             |                          |                             |                          |                             |                             |                             |                          |
|-----------------------------|-----------------------------|--------------------------|-----------------------------|--------------------------|-----------------------------|-----------------------------|-----------------------------|--------------------------|
| <input type="radio"/> AL    | <input type="checkbox"/> CT | <input type="radio"/> HI | <input type="radio"/> KY    | <input type="radio"/> MN | <input type="checkbox"/> NH | <input type="radio"/> OH    | <input type="radio"/> SC    | <input type="radio"/> VI |
| <input type="radio"/> AK    | <input type="radio"/> DE    | <input type="radio"/> ID | <input type="radio"/> LA    | <input type="radio"/> MS | <input type="radio"/> NJ    | <input type="radio"/> OK    | <input type="radio"/> SD    | <input type="radio"/> VA |
| <input type="radio"/> AZ    | <input type="checkbox"/> DC | <input type="radio"/> IL | <input type="checkbox"/> ME | <input type="radio"/> MO | <input type="radio"/> NM    | <input type="radio"/> OR    | <input type="radio"/> TN    | <input type="radio"/> WA |
| <input type="radio"/> AR    | <input type="checkbox"/> FL | <input type="radio"/> IN | <input type="checkbox"/> MD | <input type="radio"/> MT | <input type="checkbox"/> NY | <input type="radio"/> PA    | <input type="checkbox"/> TX | <input type="radio"/> WV |
| <input type="checkbox"/> CA | <input type="radio"/> GA    | <input type="radio"/> IA | <input type="checkbox"/> MA | <input type="radio"/> NE | <input type="checkbox"/> NC | <input type="radio"/> PR    | <input type="radio"/> UT    | <input type="radio"/> WI |
| <input type="radio"/> CO    | <input type="radio"/> GU    | <input type="radio"/> KS | <input type="radio"/> MI    | <input type="radio"/> NV | <input type="radio"/> ND    | <input type="checkbox"/> RI | <input type="checkbox"/> VT |                          |

*If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).*

**Item 3 Form of Organization**

A. How are you organized?

- Corporation  Sole Proprietorship  Limited Liability Partnership (LLP)
- Partnership  Limited Liability Company (LLC)  Limited Partnership (LP)
- Other (specify): \_\_\_\_\_

*If you are changing your response to this Item, see Part 1A instruction 4.*

B. In what month does your fiscal year end each year? December

C. Under the laws of what state or country are you organized? Massachusetts

*If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.*

*If you are changing your response to this Item, see Part 1A Instruction 4.*

## Item 4 Successions

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser?

Yes  No

*If "yes," complete Item 4.B. and Section 4 of Schedule D.*

B. Date of Succession: \_\_\_\_\_  
(mm/dd/yyyy)

*If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.*

## Item 5 Information About Your Advisory Business

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

### Employees

*If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4) and (5).*

A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.

20

B.

(1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?

9

(2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?

0

(3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?

9

(4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?

0

(5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?

0



Your Name Wingate Wealth Advisors, Inc.

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(6) Approximately how many firms or other persons solicit advisory clients on your behalf?

0

*In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.*

**Clients**

*In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.*

C. (1) To approximately how many clients did you provide investment advisory services during your most recently completed fiscal year?

0     1-10     11-25     26-100

If more than 100, how many? 600 (round to the nearest 100)

(2) Approximately what percentage of your clients are non-United States persons? 0 %

D. *For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships. The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, check "None" in response to Item 5.D.(1)(d) and do not check any of the boxes in response to Item 5.D.(2)(d).*

(1) What types of clients do you have? Indicate the approximate percentage that each type of client comprises of your total number of clients. If a client fits into more than one category, check all that apply.

	<u>None</u>	<u>Up to 10%</u>	<u>11-25%</u>	<u>26-50%</u>	<u>51-75%</u>	<u>76-99%</u>	<u>100%</u>
(a) Individuals (other than high net worth individuals)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) High net worth individuals	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(c) Banking or thrift institutions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(d) Investment companies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(e) Business development companies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(f) Pooled investment vehicles (other than investment companies)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(g) Pension and profit sharing plans (but not the plan participants)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(h) Charitable organizations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(i) Corporations or other businesses not listed above	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(j) State or municipal government entities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(k) Other investment advisers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(l) Insurance companies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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(m) Other: \_\_\_\_\_  € € € € € € €

(2) Indicate the approximate amount of your regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If a *client* fits into more than one category, check all that apply.

	<u>None</u>	<u>Up to 25%</u>	<u>Up to 50%</u>	<u>Up to 75%</u>	<u>&gt;75%</u>
(a) Individuals (other than <i>high net worth individuals</i> )	<input type="radio"/> €	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(b) <i>High net worth individuals</i>	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input checked="" type="radio"/> ⓑ
(c) Banking or thrift institutions	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(d) Investment companies	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(e) Business development companies	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(f) Pooled investment vehicles (other than investment companies)	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(g) Pension and profit sharing plans (but not the plan participants)	<input type="radio"/> €	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(h) Charitable organizations	<input type="radio"/> €	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(i) Corporations or other businesses not listed above	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(j) State or municipal <i>government entities</i>	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(k) Other investment advisers	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(l) Insurance companies	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €
(m) Other: _____	<input checked="" type="radio"/> ⓑ	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €	<input type="radio"/> €

**Compensation Arrangements**

E. You are compensated for your investment advisory services by (check all that apply):

- (1) A percentage of assets under your management
- (2) Hourly charges
- (3) Subscription fees (for a newsletter or periodical)
- (4) Fixed fees (other than subscription fees)
- (5) Commissions
- (6) *Performance-based fees*
- (7) Other (specify): \_\_\_\_\_

**Regulatory Assets Under Management**

F.(1) Do you provide continuous and regular supervisory or management services to securities portfolios?  Yes  No

(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

	<u>U.S. Dollar Amount</u>	<u>Total Number of Accounts</u>
Discretionary:	(a) \$ <u>406,264,565</u> .00	(d) <u>1,492</u>

Non-Discretionary:	(b) \$ <u>128,693,730</u>	.00	(e) <u>370</u>
Total:	(c) \$ <u>534,958,295</u>	.00	(f) <u>1,862</u>

*Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.*

### Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- (1) Financial planning services
- (2) Portfolio management for individuals and/or small businesses
- (3) Portfolio management for investment companies (as well as “business development companies” that have made an election pursuant to section 54 of the Investment Company Act of 1940)
- (4) Portfolio management for pooled investment vehicles (other than investment companies)
- (5) Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
- (6) Pension consulting services
- (7) Selection of other advisers (including *private fund* managers)
- (8) Publication of periodicals or newsletters
- (9) Security ratings or pricing services
- (10) Market timing services
- (11) Educational seminars/workshops
- (12) Other (specify): \_\_\_\_\_

*Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G. of Schedule D.*

H. If you provide financial planning services, to how many clients did you provide these services during your last fiscal year?

- 0   
  1-10   
  11-25   
  26-50   
  51-100   
  101-250   
  251-500  
 More than 500    If more than 500, how many? \_\_\_\_\_ (round to the nearest 500)

*In your responses to this Item 5.H., do not include as “clients” the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.*

I. If you participate in a *wrap fee program*, do you (check all that apply):

- (1) *sponsor the wrap fee program?*
- (2) *act as a portfolio manager for the wrap fee program?*

*If you are a portfolio manager for a wrap fee program, list the names of the programs and their sponsors in Section 5.I.(2) of Schedule D.*

*If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check either Item 5.I.(1) or 5.I.(2).*

FORM ADV Part 1A Page 11 of 19	Your Name <u>Wingate Wealth Advisors, Inc.</u>	CRD Number <u>105012</u>
	Date <u>March 13, 2017</u>	SEC 801- or 802 Number <u>80128664</u>

- J. In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?  Yes  No

## Item 6 Other Business Activities

In this Item, we request information about your firm's other business activities.

A. You are actively engaged in business as a (check all that apply):

- (1) broker-dealer (registered or unregistered)
- (2) registered representative of a broker-dealer
- (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (4) futures commission merchant
- (5) real estate broker, dealer, or agent
- (6) insurance broker or agent
- (7) bank (including a separately identifiable department or division of a bank)
- (8) trust company
- (9) registered municipal advisor
- (10) registered security-based swap dealer
- (11) major security-based swap participant
- (12) accountant or accounting firm
- (13) lawyer or law firm
- (14) other financial product salesperson (specify): \_\_\_\_\_

If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B, complete Section 6.A. of Schedule D.

- B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?  Yes  No
- (2) If yes, is this other business your primary business?  Yes  No  
If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.
- (3) Do you sell products or provide services other than investment advice to your advisory clients?  Yes  No  
If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.

## Item 7 Financial Industry Affiliations and *Private Fund Reporting*

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)

- (2) other investment adviser (including financial planners)
- (3) registered municipal advisor
- (4) registered security-based swap dealer
- (5) major security-based swap participant
- (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- (7) futures commission merchant
- (8) banking or thrift institution
- (9) trust company
- (10) accountant or accounting firm
- (11) lawyer or law firm
- (12) insurance company or agency
- (13) pension consultant
- (14) real estate broker or dealer
- (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

*For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.*

*You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.*

*You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.*

B. Are you an adviser to any private fund?  Yes  No

*If “yes,” then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If another adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.*

*In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund’s name.*

## Item 8 Participation of Interest in *Client* Transactions

In this Item, we request information about your participation and interest in your *clients’* transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*, including foreign affiliates.

Proprietary Interest in Client Transactions

- | A. Do you or any <i>related person</i> :   | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| (1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?   | e          | b         |
| (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?   | e          | b         |
| (3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))? | e          | b         |

Sales Interest in Client Transactions

- | B. Do you or any <i>related person</i> :   | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| (1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?        | e          | b         |
| (2) recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative?  | e          | b         |
| (3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)? | e          | b         |

Investment or Brokerage Discretion

- | C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the:         | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| (1) securities to be bought or sold for a <i>client's</i> account?                                   | b          | e         |
| (2) amount of securities to be bought or sold for a <i>client's</i> account?                         | b          | e         |
| (3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?  | e          | b         |
| (4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions? | e          | b         |

- |   | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| D. If you answer "yes" to C.(3) above, are any of the brokers or dealers <i>related persons</i> ? | e          | e         |
| E. Do you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?           | b          | e         |

- F. If you answer “yes” to E above, are any of the brokers or dealers *related persons*? e b
- G. (1) Do you or any *related person* receive research or other products or services other than execution from a broker-dealer or a third party (“soft dollar benefits”) in connection with *client* securities transactions? e b
- (2) If “yes” to G.(1) above, are all the “soft dollar benefits” you or any *related persons* receive eligible “research or brokerage services” under section 28(e) of the Securities Exchange Act of 1934? e e
- H. Do you or any *related person*, directly or indirectly, compensate any *person* for *client* referrals? e b
- I. Do you or any *related person*, directly or indirectly, receive compensation from any *person* for *client* referrals? e b

*In responding to Items 8.H and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H) or received from (in answering Item 8.I) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.*

## Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody* of *client* (other than clients that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

- A. (1) Do you have *custody* of any advisory *clients*': Yes No
- (a) cash or bank accounts? b e
- (b) securities? b e

*If you are registering or registered with the SEC, answer “No” to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients’ accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-(2)(d)(5)) from the related person.*

(2) If you checked “yes” to Item 9.A.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which you have *custody*:

U.S. Dollar Amount	Total Number of <i>Clients</i>
(a) \$ <u>98,172,901</u>	(b) <u>219</u>

*If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients’ accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). Instead, include that information in your response to Item 9.B.(2).*

Your Name Wingate Wealth Advisors, Inc.  
Date March 13, 2017

CRD Number 105012  
SEC 801- or 802 Number 80128664

B. (1) In connection with advisory services you provide to *clients*, do any of your *related persons* have Yes No  
*custody* of any of your advisory *clients*':

- (a) cash or bank accounts?  **e**  **b**  
(b) securities?  **e**  **b**

*You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).*

(2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:

U.S. Dollar Amount	Total Number of <i>clients</i>
(a) \$ _____	(b) _____

C. If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:

- (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.
- (2) An *independent public accountant* audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.
- (3) An *independent public accountant* conducts an annual surprise examination of client funds and securities.
- (4) An *independent public accountant* prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for client funds and securities.

*If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).*

D. Do you or your *related person(s)* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

- (1) you act as a qualified custodian  **e**  **b**  
(2) your *related person(s)* act as qualified custodian(s)  **e**  **b**

*If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.*

E. If you are filing your *annual updating* amendment and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced: 01/2016



F. If you or your *related persons* have custody of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

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## Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

A. Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?  
 Yes  No

*If yes, complete Section 10.A. of Schedule D.*

B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

## Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in “yes” answers to more than one of the questions below.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a “separately identifiable department or division” (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

*If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.*

You must complete the appropriate Disclosure Reporting Page (“DRP”) for “yes” answers to the questions in this Item 11.

Yes No

Do any of the events below involve you or any of your *supervised persons*?

For “yes” answers to the following questions, complete a Criminal Action DRP:

- |   | <u>Yes</u> | <u>No</u> |
|---|------------|-----------|
| A. In the past ten years, have you or any <i>advisory affiliate</i> :   |            |           |
| (1) been convicted of or pled guilty or nolo contendere (“no contest”) in a domestic, foreign, or military court to any <i>felony</i> ?   | e          | b         |
| (2) been <i>charged</i> with any <i>felony</i> ?  | e          | b         |
| <i>If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.</i>   |            |           |
| B. In the past ten years, have you or any <i>advisory affiliate</i> :   |            |           |
| (1) been convicted of or pled guilty or nolo contendere (“no contest”) in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? | e          | b         |
| (2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?  | e          | b         |
| <i>If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.</i>   |            |           |

For “yes” answers to the following questions, complete a Regulatory Action DRP:

- |  | <u>Yes</u> | <u>No</u> |
|--|------------|-----------|
| C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:  |            |           |
| (1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?  | e          | b         |
| (2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of SEC or CFTC regulations or statutes?  | e          | b         |
| (3) <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted? | e          | b         |
| (4) entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> activity?  | e          | b         |
| (5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?                              | e          | b         |
| D. Has any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> :  |            |           |
| (1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?  | e          | b         |
| (2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or statutes?   | e          | b         |

Yes      No

(3) ever *found* you or any *advisory affiliate* to have been a cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?

e       b

(4) in the past ten years, entered an *order* against you or any *advisory affiliate* in connection with an *investment-related* activity?

e       b

(5) ever denied, suspended, or revoked your or any *advisory affiliate's* registration or license, or otherwise prevented you or any *advisory affiliate*, by *order*, from associating with an *investment-related* business or restricted your or any *advisory affiliate's* activity?

e       b

E. Has any *self-regulatory organization* or commodities exchange ever:

(1) *found* you or any *advisory affiliate* to have made a false statement or omission?

e       b

(2) *found* you or any *advisory affiliate* to have been *involved* in a violation of its rules (other than a violation designated as a "*minor rule violation*" under a plan approved by the SEC)?

e       b

(3) *found* you or any *advisory affiliate* to have been the cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?

e       b

(4) disciplined you or any *advisory affiliate* by expelling or suspending you or the *advisory affiliate* from membership, barring or suspending you or the *advisory affiliate* from association with other members, or otherwise restricting your or the *advisory affiliate's* activities?

e       b

F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any *advisory affiliate* ever been revoked or suspended?

e       b

G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?

e       b

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

Yes      No

H. (1) Has any domestic or foreign court:

(a) in the past ten years, enjoined you or any *advisory affiliate* in connection with any *investment-related* activity?

e       b

(b) ever *found* that you or any *advisory affiliate* were *involved* in a violation of *investment-related* statutes or regulations?

e       b

(c) ever dismissed, pursuant to a settlement agreement, an *investment-related* civil action brought against you or any *advisory affiliate* by a state or *foreign financial regulatory authority*?

e       b



**Part 2A of Form ADV: *Firm Brochure***

**Wingate Wealth Advisors, Inc.**

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Lexington, MA 02420

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Email: [mark.greco@wingatewealthadvisors.com](mailto:mark.greco@wingatewealthadvisors.com)  
Web Address: [www.wingatewealthadvisors.com](http://www.wingatewealthadvisors.com)

March 13, 2017

This brochure provides information about the qualifications and business practices of Wingate Wealth Advisors, Inc.. If you have any questions about the contents of this brochure, please contact Mark F. Greco at 781-862-7100 or [mark.greco@wingatewealthadvisors.com](mailto:mark.greco@wingatewealthadvisors.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Wingate Wealth Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 105012.

## Item 2 Material Changes

We last filed our brochure with the SEC on March 25, 2016.

This Firm Brochure, dated March 13, 2017, provides you with a summary of Wingate Wealth Advisors, Inc.'s advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This Item is used to provide our clients with a summary of new and/or updated information; we will inform you of the revision(s) based on the nature of the information as follows:

1. Annual Update: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end (FYE) of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.
2. Material Changes: Should a material change in our operations occur, depending on its nature, we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location; disciplinary proceedings; significant changes to our advisory services or advisory affiliates – any information that is critical to a client's full understanding of who we are, how to find us, and how we do business.

At this time, we have no material changes to report.

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## **Item 4    Advisory Business**

Wingate Wealth Advisors, Inc. is an SEC registered investment adviser with its principal place of business located in Massachusetts. Wingate Wealth Advisors, Inc., formerly known as Wingate Financial Corporation, began conducting business in 1986.

Wingate Wealth Advisors, Inc. provides investment management and financial planning services.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Jeffrey Hayden White, Corporate Officer
- Arthur Felix von der Linden, Jr.
- Richard Snell Hayes

We offer the following services to our clients:

### **INVESTMENT MANAGEMENT AND SUPERVISORY SERVICES**

Wingate Wealth Advisors, Inc. provides continuous advice regarding the investment of client funds based on the individual needs of the client. During our data gathering process, we determine the client's investment goals and objectives, including time horizons, risk tolerance, and liquidity needs. We also review and discuss a client's prior investment experience, as well as family composition and background. We then prepare a personal Investment Policy Statement and create and manage a portfolio based on that Investment Policy Statement.

Wingate Wealth Advisors, Inc. primarily manages client accounts on a discretionary basis, although we may accept non-discretionary accounts. Wingate Wealth Advisors, Inc. does not have the authority to withdraw funds from client accounts, except to pay investment management fees as authorized by the client.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Wingate Wealth Advisors, Inc. researches and selects third party money managers who are primarily accessed through no-load mutual funds. Our investment recommendations will generally include advice regarding the following securities:

- Mutual fund shares
- Exchange traded funds (ETF's)
- Corporate securities



- Municipal securities
- United States government securities
- Certificates of deposit

Because some types of investments involve additional degrees of risk, they will only be implemented or recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

In addition to investing in mutual funds and ETF's, Wingate Wealth Advisors, Inc. may also place accounts with third party money managers, on a fully disclosed basis, either directly, or through a registered investment adviser consultant firm. We select third party money managers based on the client's individual needs as described in the client's Investment Policy Statement and subject to the third party money manager's minimum account size requirements. The fee for this service is as mutually agreed upon by the client, the third-party investment manager, and Wingate Wealth Advisors, Inc..

### **Amount of Managed Assets**

As of February 7, 2017, Wingate Wealth Advisors, Inc. had \$534,958,295 assets under management, with \$406,264,565 of clients' assets managed on a discretionary basis, and \$128,693,730 of clients' assets on a non-discretionary basis.

### **FINANCIAL PLANNING SERVICES**

Wingate Wealth Advisors, Inc. also provides financial planning services. Financial planning typically includes a comprehensive evaluation of a client's current financial situation and helping establish the client's goals and objectives. During a comprehensive Financial Planning Review, we seek to identify and consider all of the factors that could impact the client's current and future financial situation.

In general, the Financial Planning Review may address any or all of the following areas:

- **PERSONAL:** We review the client's family situation and discuss financial goals and objectives.
- **FINANCIAL STATEMENT:** We prepare a Working Balance Sheet, listing the client's assets and liabilities.
- **CASH FLOW:** We review the client's income and spending situation.
- **TAX PLANNING:** We review the client's current and expected future tax situation with the objective of identifying opportunities for tax savings.

- **ESTATE & DISABILITY FUNDING:** We review the client's cash needs in the event of disability or premature death.
- **INSURANCE:** We review existing insurance policies for health, disability, life, long term care, and property and casualty coverages.
- **ESTATE PLANNING:** We assist the client in reviewing their estate plan, including, as appropriate, revocable and irrevocable trusts, wills, estate tax planning, powers of attorney, asset protection planning, assisted living and nursing home care, Medicaid eligibility and elder law issues.
- **RETIREMENT PLANNING:** We prepare a long term financial analysis projecting future cash flows, asset values and withdrawal plans.
- **EDUCATION FUNDING:** We assist the client in assessing and developing a strategy and investment plan to meet education costs.
- **INVESTMENTS:** We evaluate investment portfolios and their appropriateness for meeting the client's goals and objectives.

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, return objectives and attitudes towards risk. We carefully review documents supplied by the client, as well as questionnaires and other financial information forms we provide to the client.

We will provide our financial planning recommendations to the client within six months of the agreement date, provided that all information needed has been promptly provided. The client will typically receive financial planning reports, schedules, and memoranda summarizing our recommendations. Should the client choose to implement our recommendations, it is the client's responsibility to work closely with his/her attorney, accountant, and insurance agent, as appropriate. We are prepared to assist in the implementation of our recommendations, but how this is carried out is entirely at the client's discretion.

Financial planning services are provided as requested by the client. A comprehensive Financial Planning Review is recommended at the onset of the client engagement. The scope of engagement and the topics to be covered will be discussed and agreed upon with the client. The review may be comprehensive in nature, or focused on specific planning topics. Subsequent to the initial engagement, the client may request periodic reviews of either the client's overall financial situation or specific planning topic(s).

## **Item 5 Fees and Compensation**

We are a fee-only investment adviser, and all of our revenues come from the fees paid by our clients. We do not accept any compensation from any third parties with respect to any transactions for the accounts of our clients, or for any referrals we may make to third parties such as attorneys, accountants, or other professionals.

## **INVESTMENT MANAGEMENT SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT FEES**

Our annual fees for Investment Management Services are based upon a percentage of assets under management. Fees are billed quarterly in arrears and are charged to clients' investment brokerage accounts unless other payment arrangements have been made.

The annualized fee for Investment Management Services will be charged as a percentage of assets under management, according to the following schedule:

### **Annual Fee Calculation**

1.25% on the first \$250,000, plus  
1.00% on the next \$750,000, plus  
0.75% on the next \$1,000,000, plus  
0.50% on the next \$1,000,000, plus  
0.40% on the balance over \$3,000,000

***Limited Negotiability of Advisory Fees:*** Although Wingate Wealth Advisors, Inc. has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client by client basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These include the complexity of the client situation, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, and reports, among other factors. The specific annual fee schedule will be identified in the agreement between the adviser and each client.

## **GENERAL INFORMATION**

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason upon receipt of written notice. Upon termination of the account, we will pro rate the final fee according to the number of days the account was under management during the billing period.

***Mutual Fund Fees:*** All fees paid to Wingate Wealth Advisors, Inc. for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or EFTs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. Wingate Wealth Advisors, Inc. seeks to minimize these fees by investing in Institutional share classes, which have lower fees than retail share classes.

**Separately Managed Account Fees:** Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the third party manager. We will clearly disclose and review any separate program fees that may be charged to clients.

**Wrap Fee Programs:** Wingate does not offer wrap fee programs.

**Additional Fees and Expenses:** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodian / broker-dealers, including, but not limited to, any transaction charges imposed by a broker-dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

**ERISA Accounts:** Wingate Wealth Advisors, Inc. is deemed to be a fiduciary to advisory clients that are employee benefit plans pursuant to the Employee Retirement Income and Securities Act ("ERISA"). As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that includes, among other things, restrictions concerning certain forms of compensation.

**Advisory Fees in General:** Clients should note that similar advisory services may be available from other registered (or unregistered) investment advisers for similar or lower fees.

**Prepayment of Fees:** Under no circumstances do we require or solicit prepayment of fees.

## FINANCIAL PLANNING FEES

Wingate Wealth Advisors, Inc.'s financial planning fee is determined based on the extent of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into an agreement with any client. Fees are charged on either a fixed fee or on an hourly basis.

Our fixed fees typically range from \$2,500 to \$7,500, depending on the specific arrangement reached with the client.

Our hourly fees range from \$175 to \$300 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the financial planning engagement.

Following the initial financial planning engagement, fees for subsequent financial planning services may be waived based on factors such as account size, and the extent and complexity of the services to be provided.

## GENERAL INFORMATION

***Termination of the Advisory Relationship:*** A client agreement may be canceled at any time, by either party, for any reason, upon receipt of written notice.

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

Wingate Wealth Advisors, Inc. does not charge performance-based fees.

### Item 7 Types of Clients

Wingate Wealth Advisors, Inc. provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Charitable organizations
- Pension and Profit Sharing Plan Participants

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

#### METHODS OF ANALYSIS and INVESTMENT STRATEGIES

The foundation of Wingate Wealth Advisors, Inc.'s investment process is our strategic investment review. Our process encompasses the following elements:

**Economic Outlook:** Our review process begins with a focus on the economic outlook, both in the U.S. and abroad. We seek to identify the primary economic trends that will impact the near and intermediate term economic environment, in both the domestic and global economies. We review the analysis and forecasts of leading economists and economic observers, and look for where there seems to be consensus, and where there is a wider divergence of opinion. Based on this information, we develop a number of scenarios, from best-case to worst-case, and assess what seems to be the most likely outcome, while giving due consideration to less likely outcomes.

**Investment Outlook:** Next, we focus on the investment outlook, with the objective of identifying both risks and opportunities in U.S. and global financial markets. We review the analysis and forecasts of some of the most thoughtful and insightful investment managers and market strategists. While it is impossible to accurately predict investment returns, we

find it helpful to consider a number of possible outcomes, and estimate their likelihood of occurring. We then assess the relative attractiveness of the various asset classes such as large U.S. stocks, emerging markets stocks, high-yield bonds, etc.

**Asset Allocations:** Our next step is to review our model portfolio asset allocations, and determine whether to add, eliminate, or adjust asset class allocations in these model portfolios. Our model portfolios cover the entire range of investment objectives from aggressive growth to conservative income, with asset allocation selections and weightings varying as the investment objectives change.

**Fund Selections:** Finally, we review our fund selections, choosing active management strategies for areas where market conditions seem to provide opportunities for active managers to create value, and passive management strategies where there appears to be less opportunity. Our criteria for active managers include a focus on the track record, management team, investment philosophy, and the appropriateness of their particular investment discipline for current market conditions.

**Asset Allocation Risks:** A risk of asset allocation is that the client may or may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, may no longer be appropriate for the client's goals.

**General Investment Risks:** Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Wingate Wealth Advisors, Inc.) will be profitable or equal any specific performance level(s).

## **Item 9 Disciplinary Information**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

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

We are engaged exclusively in the activities described in Item 4 above and are not engaged in any other business activities.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Wingate Wealth Advisors, Inc. and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics, but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of employee quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Our code also provides for oversight, enforcement and record keeping provisions.

Wingate Wealth Advisors, Inc.'s Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [mark.greco@wingatewealthadvisors.com](mailto:mark.greco@wingatewealthadvisors.com), or by calling us at 781-862-7100.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

As these situations may represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access

person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.

4. We have established procedures for the maintenance of all required books and records.
5. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
6. We require delivery and acknowledgment of the Code of Ethics by each supervised person of our firm.
7. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
8. Any individual who violates any of the above restrictions may be subject to termination.

## **Item 12 Brokerage Practices**

We make custodian broker-dealer recommendations based on the services provided by the broker, such as ability to execute trades, on-line access to client account information, transaction charges, reporting capabilities, duplicate monthly statements, and access to mutual funds, including lower sales charges, if any, and lower minimum purchase amounts.

We currently recommend the Schwab Institutional division of Charles Schwab & Co., Inc., a FINRA registered broker-dealer, member SIPC ("Schwab"), National Financial Services LLC and Fidelity Brokerage Services LLC, FINRA registered broker-dealers, members SIPC (together with all affiliates, "Fidelity"), or TD Ameritrade Institutional, a division of TD Ameritrade Inc., a FINRA registered broker-dealer, member SIPC ("TD Ameritrade") for custody and brokerage services for our clients. Wingate Wealth Advisors, Inc. is independently owned and operated and not affiliated with Schwab, Fidelity or TD Ameritrade.

Schwab provides Wingate Wealth Advisors, Inc. with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Institutional. Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment or have a sales charge for retail investors.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through transaction fees or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that benefit



Wingate Wealth Advisors, Inc. but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that

- i. provide access to client account data (such as trade confirmations and account statements);
- ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- iii. provide research, pricing and other market data;
- iv. facilitate payment of our fees from clients' accounts; and
- v. assist with back-office functions, record keeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- i. compliance, legal and business consulting;
- ii. publications and conferences on practice management and business succession; and
- iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Wingate Wealth Advisors, Inc. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend that clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

Wingate Wealth Advisors, Inc. has an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides Wingate Wealth Advisors, Inc. with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Wingate Wealth Advisors, Inc. in conducting business and in serving the best interests of their clients but that may benefit Wingate Wealth Advisors, Inc.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions

are charged for individual equity and debt securities transactions). Fidelity enables Wingate Wealth Advisors, Inc. to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to Wingate Wealth Advisors, Inc., at no additional charge to Wingate Wealth Advisors, Inc., certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by Wingate Wealth Advisors, Inc. (within specified parameters).

As a result of receiving such services for no additional cost, Wingate Wealth Advisors, Inc. may have an incentive to continue to use or expand the use of Fidelity's services. Wingate Wealth Advisors, Inc. examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of Wingate Wealth Advisors, Inc.'s clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Wingate Wealth Advisors, Inc. determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Wingate Wealth Advisors, Inc. will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by Wingate Wealth Advisors, Inc. will generally be used to service all of Wingate Wealth Advisors, Inc.'s clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. Wingate Wealth Advisors, Inc. and Fidelity are not affiliates, and no broker-dealer affiliated with Wingate Wealth Advisors, Inc. is involved in the relationship between Wingate Wealth Advisors, Inc. and Fidelity.

Wingate Wealth Advisors, Inc. also participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member SIPC ("TD Ameritrade"), an SEC-registered broker-dealer and FINRA member. TD Ameritrade offers services to independent investment advisers which include custody of securities, trade execution, clearance and settlement of transactions. Wingate Wealth Advisors, Inc. is independently owned and operated and not affiliated with TD Ameritrade.

Wingate Wealth Advisors, Inc. participates in TD Ameritrade's Institutional customer program and we may recommend TD Ameritrade to our clients for custody and brokerage services. There is no direct link between our firm's participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits received by Wingate Wealth Advisors, Inc. include the following products and services (provided without cost or at a discount): duplicate client statements and

confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; 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 Wingate Wealth Advisors, Inc. by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Wingate Wealth Advisors, Inc.'s related persons and may also pay or reimburse expenses for Wingate Wealth Advisors, Inc.'s personnel to attend conferences or meetings relating to the program or to TD Ameritrade's adviser custody and brokerage services generally.

Some of the products and services made available by TD Ameritrade through the program may benefit Wingate Wealth Advisors, Inc. but may not directly benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by Wingate Wealth Advisors, Inc. through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Wingate Wealth Advisors, Inc. or our related persons in and of itself, creates a potential conflict of interest and may indirectly influence our recommendation of TD Ameritrade for custody and brokerage services.

## **Item 13 Review of Accounts**

### **INVESTMENT SUPERVISORY SERVICES INDIVIDUAL PORTFOLIO MANAGEMENT**

**REVIEWS:** While the underlying investments held in clients' accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by: Financial Advisors: Jeffrey H. White, Peter Frailey, Carol M. Khouri, Matthew A. Lasker, Teo Ferreira and Debra S. McDonald; Portfolio Manager: Joseph N. Evangelista; and Portfolio Analyst: Andrew Busa.

**REPORTS:** In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer custodian, we provide quarterly reports summarizing account performance, balances, holdings, and management fees.

## **FINANCIAL PLANNING SERVICES**

**REVIEWS:** While we recommend that clients request an annual Financial Planning Review, no formal Financial Planning reviews will be conducted unless requested by the client.

**REPORTS:** Financial Planning clients will receive financial planning reports, schedules, and memoranda summarizing our recommendations during the Financial Planning Review.

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

#### **CLIENT REFERRALS**

Wingate Wealth Advisors, Inc. stopped accepting new client referrals from Solicitors on January 1, 2007.

### **Item 15 Custody**

Although custody of clients' account assets will be maintained at a qualified custodian, some services that we provide to our clients might result in our being deemed to have custody of a client's assets. Therefore, we have provided the required disclosure in the Custody section of Part 1 of Form ADV.

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm typically directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a quarterly basis. We urge our clients to carefully compare the information provided on these statements to ensure that all account transactions, holdings and values are correct and current.

**Part 2B of Form ADV: *Brochure Supplement***

Joseph N. Evangelista  
Teofilo Ferreira  
Peter Frailey  
Mark F. Greco  
Elizabeth W. Gustin  
Carol M. Khouri  
Matthew A. Lasker  
Debra S. McDonald  
Jeffrey Hayden White

Wingate Wealth Advisors, Inc.

Lexington, MA

March 13, 2017

This brochure supplement provides information about the individual(s) listed above that supplements the Wingate Wealth Advisors, Inc. brochure. You should have received a copy of that brochure. Please contact Mark F. Greco if you did not receive Wingate Wealth Advisors, Inc.'s brochure or if you have any questions about the contents of this supplement.

Additional information about the individual(s) listed above is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2 Educational Background and Business Experience

**Full Legal Name:** Joseph N. Evangelista      **Born:** 1974

### Education

- Boston College, Chestnut Hill, MA; BS, Accounting; 1996
- Suffolk University Law School, Boston, MA; JD; 1999

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Professional Staff; from 04/2003 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Portfolio Manager; from 01/2009 to Present
- Wingate Financial Corporation; Portfolio Analyst; from 04/2003 to 12/2008
- American Express Financial Advisors; Client Counselor; from 04/1999 to 04/2003
- Brandon Associates, LLC; Legal Intern; from 09/1997 to 04/1999

### Designations

Joseph N. Evangelista has earned the following designation(s) and is in good standing with the granting authority:

- **Chartered Mutual Fund Counselor<sup>SM</sup>; College for Financial Planning; 2004**  
The Chartered Mutual Fund Counselor<sup>SM</sup> (CMFC®) designation is awarded by the College for Financial Planning to investment practitioners who complete its nine-module CMFC® Professional Education Program jointly sponsored by the College and the Investment Company Institute, pass an examination, commit to a code of ethics and agree to pursue continuing education.

## Item 3 Disciplinary Information

Joseph N. Evangelista has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Joseph N. Evangelista is not engaged in any other investment-related activities.

2. Joseph N. Evangelista does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Joseph N. Evangelista is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

## **Item 5 Additional Compensation**

Joseph N. Evangelista does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

Wingate follows a compliance plan to ensure adherence to our written policies and procedures and to industry regulations. Among other things, this plan includes monitoring correspondence with clients; archiving all email; an annual compliance meeting with all employees; written acknowledgement by all employees that they understand and will comply with our written policies and procedures, our privacy policy and our code of ethics; and a periodic review of client files and client accounts.

Wingate requires all employees who have the authority to instruct the custodian to execute trades in client accounts or to execute client instructions to withdraw funds (i.e., wire transfer, check request), to have a token card as an additional level of security with the custodian.

## Item 2 Educational Background and Business Experience

**Full Legal Name:** Teofilo Ferreira      **Born:** 1971

### Education

- Boston University, Boston, MA; MBA, Finance; 2005
- Bryant College, Smithfield, RI; BS, Finance; 1993

### Business Experience

- Wingate Wealth Advisors, LLC; Professional Staff; from 07/2014 to Present
- Wingate Wealth Advisors, Inc.; Financial Advisor; from 07/2014 to Present
- TIAA-CREF; Wealth Management Advisor; from 01/2013 to 07/2014
- Merrill Lynch & Company; Financial Advisor; from 09/2009 to 08/2012
- State Street Corporation; Vice President, Senior Sales Trader; from 10/1994 to 12/2008

### Designations

Teofilo Ferreira has earned the following designation(s) and is in good standing with the granting authority:

- **Chartered Retirement Planning Counselor<sup>SM</sup>; College for Financial Planning; 2011**

The Chartered Retirement Planning Counselor<sup>SM</sup> (CRPC®) is awarded by the College for Financial Planning to applicants who complete course work in pre- and post-retirement needs, asset management, estate planning and retirement planning, pass an exam, adhere to a code of ethics and complete 16 hours of continuing education every two years.

- **Certified Financial Planner<sup>TM</sup>; Certified Financial Planner Board of Standards, Inc.; 2012**

The program is administered by the Certified Financial Planner Board of Standards Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.



### **Item 3 Disciplinary Information**

Teofilo Ferreira has no reportable disciplinary history.

### **Item 4 Other Business Activities**

#### **A. Investment-Related Activities**

1. Teofilo Ferreira is not engaged in any other investment-related activities.
2. Teofilo Ferreira does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

Teofilo Ferreira is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

Teofilo Ferreira does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

Wingate follows a compliance plan to ensure adherence to our written policies and procedures and to industry regulations. Among other things, this plan includes monitoring correspondence with clients; archiving all email; an annual compliance meeting with all employees; written acknowledgement by all employees that they understand and will comply with our written policies and procedures, our privacy policy and our code of ethics; and a periodic review of client files and client accounts.

Wingate requires all employees who have the authority to instruct the custodian to execute trades in client accounts or to execute client instructions to withdraw funds (i.e., wire transfer, check request), to have a token card as an additional level of security with the custodian.

## Item 2 Educational Background and Business Experience

**Full Legal Name:** Peter Frailey      **Born:** 1949

### Education

- Bowdoin College, Brunswick, ME; BA, History; 1971
- Brown University, Providence, RI; MAT, Education; 1973
- Babson College, Babson Park, MA; MBA, Business; 1985

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Professional Staff; from 05/1986 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Financial Advisor; from 05/1986 to Present
- Wingate Planning Corporation; Financial Planner; from 01/1994 to 03/2013
- Winslow, Evans and Crocker, Inc.; Registered Rep; from 06/2006 to 09/2006
- Wingate Capital Corporation; Registered Rep; from 05/1986 to 06/2006
- Wingate Insurance Agency, Inc.; Insurance Broker; from 05/1986 to 11/2006

### Designations

Peter Frailey has earned the following designation(s) and is in good standing with the granting authority:

- **Certified Financial Planner™; Certified Financial Planner Board of Standards, Inc.; 1985**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

### **Item 3 Disciplinary Information**

Peter Frailey has no reportable disciplinary history.

### **Item 4 Other Business Activities**

#### **A. Investment-Related Activities**

1. Peter Frailey is not engaged in any other investment-related activities.
2. Peter Frailey does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

Peter Frailey is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

Peter Frailey does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

Wingate follows a compliance plan to ensure adherence to our written policies and procedures and to industry regulations. Among other things, this plan includes monitoring correspondence with clients; archiving all email; an annual compliance meeting with all employees; written acknowledgement by all employees that they understand and will comply with our written policies and procedures, our privacy policy and our code of ethics; and a periodic review of client files and client accounts.

Wingate requires all employees who have the authority to instruct the custodian to execute trades in client accounts or to execute client instructions to withdraw funds (i.e., wire transfer, check request), to have a token card as an additional level of security with the custodian.

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

**Full Legal Name:** Mark F. Greco      **Born:** 1951

### **Education**

- Boston College, Chestnut Hill, MA; BA, Education; 1973
- Babson College, Babson Park, MA; MBA, Finance; 1978

### **Business Experience**

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Chief Executive Officer; from 2015 to present - Chief Operating Officer; from 2011 to 2015
- State Street Corporation; Vice President, Client Management / Fund Accounting; from 2007 to 2010
- New England Investment Group; Chief Operations Officer; 2006
- SEI Investments; Senior Vice President / Chief Operations Officer; from 2004 to 2006
- John Hancock Financial Services; Vice President of Operations; from 2000 to 2002
- New England Securities; Vice President / Chief Operating Officer; from 1985 to 2000

## **Item 3 Disciplinary Information**

Mark F. Greco has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Mark F. Greco is not engaged in any other investment-related activities.
2. Mark F. Greco does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

## **B. Non Investment-Related Activities**

Mark F. Greco is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his or her time.

## **Item 5 Additional Compensation**

Mark F. Greco does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** Jeffrey H. White

**Title:** Chief Compliance Officer

**Phone Number:** 781-862-7100

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## Item 2 Educational Background and Business Experience

**Full Legal Name:** Elizabeth W. Gustin      **Born:** 1952

### Education

- University of Vermont, Burlington, VT; BSBA, Accounting; 1974
- Babson College, Babson Park, MA; MBA; 1980
- Merrimack College, North Andover, MA; Certificate of Advanced Study in Financial Planning; 2010

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Director of Finance; from 08/1986 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Financial Planner; from 03/2013 to Present
- Wingate Planning Corporation; Financial Planner; from 01/2008 to 03/2013

### Designations

Elizabeth W. Gustin has earned the following designation(s) and is in good standing with the granting authority:

- **Certified Financial Planner™; Certified Financial Planner Board of Standards, Inc.; 2012**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

## Item 3 Disciplinary Information

Elizabeth W. Gustin has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Elizabeth W. Gustin is not engaged in any other investment-related activities.

2. Elizabeth W. Gustin does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Elizabeth W. Gustin is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time.

## **Item 5 Additional Compensation**

Elizabeth W. Gustin does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

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## Item 2 Educational Background and Business Experience

**Full Legal Name:** Carol M. Khouri      **Born:** 1961

### Education

- Florida Atlantic University, Boca Raton, FL; BA, Philosophy; 1984

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Professional Staff; from 01/2002 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Financial Advisor; from 01/2002 to Present - Corporate Officer; from 12/2012 to Present
- Wingate Planning Corporation; Client Counselor; from 01/2002 to 03/2013
- Wingate Capital Corporation; Registered Rep; from 01/2002 to 03/2006
- Prudential Securities; Wealth Analyst; from 06/2001 to 09/2001
- Prudential Securities; Financial Advisor; from 09/1995 to 06/2001
- Prudential Securities; Reg Sales Associate; from 05/1988 to 09/1995

### Designations

Carol M. Khouri has earned the following designation(s) and is in good standing with the granting authority:

- **Certified Financial Planner™; Certified Financial Planner Board of Standards, Inc.; 1998**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.



• **Certified Divorce Financial Analyst™; Institute for Divorce Financial Analysts™; 2003**

A Certified Divorce Financial Analyst™ is a member of the Institute for Divorce Financial Analysts™ who specializes in the financial issues surrounding divorce. The role of the CDFA™ includes acting as an advisor to one party's divorce lawyer, or as a mediator for both parties. A CDFA™ uses his or her knowledge of tax law, asset distribution, and short- and long-term financial planning to achieve an equitable settlement. To become a CDFA™, a person must have two years of financial planning or legal experience. After attaining the proper work experience, candidates are required to complete a four-step modular program and exam designed by the IDFA. The program is a self-study system, covering financial and tax issues, with case studies of divorce settlements.

• **Certified Financial Divorce Specialist™; Financial Divorce Association, Inc.; 2011**

The Certified Financial Divorce Specialist™ receives specialized training in the financial, legal and tax aspects of divorce. The designation is designed specifically for financial professionals and for divorce professionals such as attorneys, CPAs, financial planners, mediators, and arbitrators.

### **Item 3 Disciplinary Information**

Carol M. Khouri has no reportable disciplinary history.

### **Item 4 Other Business Activities**

#### **A. Investment-Related Activities**

1. Carol M. Khouri is not engaged in any other investment-related activities.
2. Carol M. Khouri does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

Carol M. Khouri is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time.

### **Item 5 Additional Compensation**

Carol M. Khouri does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

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## Item 2 Educational Background and Business Experience

**Full Legal Name:** Matthew A. Lasker      **Born:** 1969

### Education

- Gettysburg College, Gettysburg, PA; BA, History; 1991

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Professional Staff; from 01/1999 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Financial Advisor; from 10/2005 to Present - Corporate Officer; from 12/2012 to Present
- Wingate Planning Corporation; Client Counselor; from 10/2005 to 03/2013
- Wingate Capital Corporation; Registered Rep; from 07/2001 to 03/2006

### Designations

Matthew A. Lasker has earned the following designation(s) and is in good standing with the granting authority:

- **Chartered Mutual Fund Counselor<sup>SM</sup>; College for Financial Planning; 1999**  
The Chartered Mutual Fund Counselor<sup>SM</sup> (CMFC<sup>®</sup>) designation is awarded by the College for Financial Planning to investment practitioners who complete its nine-module CMFC<sup>®</sup> Professional Education Program jointly sponsored by the College and the Investment Company Institute, pass an examination, commit to a code of ethics and agree to pursue continuing education.

- **Certified Financial Planner<sup>TM</sup>; Certified Financial Planner Board of Standards, Inc.; 2009**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP<sup>®</sup> designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP<sup>®</sup> certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

### **Item 3 Disciplinary Information**

Matthew A. Lasker has no reportable disciplinary history.

### **Item 4 Other Business Activities**

#### **A. Investment-Related Activities**

1. Matthew A. Lasker is not engaged in any other investment-related activities.

2. Matthew A. Lasker does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

Matthew A. Lasker is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

Matthew A. Lasker does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

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## Item 2 Educational Background and Business Experience

**Full Legal Name:** Debra S. McDonald      **Born:** 1970

### Education

- Miami University, Oxford, OH; BS, Business; 1992

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Professional Staff; from 04/2005 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Financial Advisor; from 04/2005 to Present
- Wingate Planning Corporation; Client Counselor; from 04/2005 to 03/2013
- Charles Schwab & Co., Inc.; Relationship Manager; from 03/2000 to 12/2004
- Fidelity Investments; Sales/Relationship Manager; from 02/1996 to 03/2000
- Fidelity Investments; Registered Representative; from 08/1993 to 02/1996

### Designations

Debra S. McDonald has earned the following designation(s) and is in good standing with the granting authority:

- **Certified Financial Planner™; Certified Financial Planner Board of Standards, Inc.; 2012**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

## Item 3 Disciplinary Information

Debra S. McDonald has no reportable disciplinary history.

## **Item 4 Other Business Activities**

### **A. Investment-Related Activities**

1. Debra S. McDonald is not engaged in any other investment-related activities.

2. Debra S. McDonald does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

### **B. Non Investment-Related Activities**

Debra S. McDonald is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time.

## **Item 5 Additional Compensation**

Debra S. McDonald does not receive any economic benefit from a non-advisory client for the provision of advisory services.

## **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

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## Item 2 Educational Background and Business Experience

**Full Legal Name:** Jeffrey Hayden White      **Born:** 1944

### Education

- Holy Cross College, Worcester, MA; BA, Liberal Arts; 1966
- Bentley University, Waltham, MA; MS, Taxation; 1979
- Bentley University, Waltham, MA; MS, Finance; 1981
- Northeastern University, Boston, MA; MBA, Business; 1985

### Business Experience

- Wingate Financial Group, Inc. / Wingate Wealth Advisors, LLC; Corporate Officer; from 05/1986 to Present
- Wingate Financial Corporation / Wingate Wealth Advisors, Inc.; Financial Advisor/Corporate Officer/Compliance Officer; from 05/1986 to Present
- Wingate Planning Corporation; Client Counselor/Corporate Officer/Compliance Officer; from 01/1994 to 03/2013
- Wingate Capital Corporation; Registered Rep/Corporate Officer; from 05/1986 to 02/1997
- Wingate Insurance Agency, Inc.; Insurance Broker; from 05/1986 to 11/2006

### Designations

Jeffrey Hayden White has earned the following designation(s) and is in good standing with the granting authority:

- **Licensed Insurance Adviser; Commonwealth of Massachusetts Division of Insurance; 1978**

The Licensed Adviser is someone who has passed an extensive written examination as well as fulfilled experience requirements to be licensed by the Division of Insurance to provide insurance advice for a fee. Further, an Adviser is someone who has committed himself or herself to maintaining extremely high standards of professional propriety and ethics as well as advanced education in their area of specialty. Only a small percentage of insurance professionals practicing in the Commonwealth of Massachusetts can call themselves an "Insurance Adviser." The Licensed Adviser is compensated directly by the client on a fee for advice basis, so the conflict associated with commission-based compensation is eliminated.

- **Certified Financial Planner™; Certified Financial Planner Board of Standards, Inc.; 1980**

The program is administered by the Certified Financial Planner Board of Standards, Inc. Those with the CFP® designation have demonstrated competency in all areas of finance related to financial planning. Candidates complete studies on over 100 topics, including stocks, bonds, taxes, insurance, retirement planning and estate planning. In addition to passing the CFP® certification exam, candidates must also complete qualifying work experience, agree to adhere to the CFP Board's code of ethics and professional responsibility and financial planning standards and complete 30 hours of continuing education every two years.

- **Chartered Life Underwriter®; The American College; 1980**

The CLU® program is administered by The American College. This designation requires five core and three elective courses that focus on various areas of insurance and financial planning. Additional program requirements must be met, including a minimum of three years of business experience, ethics standards and agree to comply with The American College Code of Ethics and Procedures. Continuing Education for this designation requires 30 hours every two years.

- **Chartered Financial Consultant®; The American College; 1982**

The ChFC® program is administered by the The American College. This designation has the same core curriculum as the CFP® designation, plus two or three additional elective courses that focus on various areas of personal financial planning. In addition to successful completion of an exam on areas of financial planning, including income tax, insurance, investment and estate planning, candidates are required to have a minimum of three years experience in a financial industry position.

- **Chartered Financial Analyst®; CFA Institute; 1982**

This designation is offered by the CFA Institute (formerly the Association for Investment Management and Research [AIMR]). To obtain the CFA charter, candidates must successfully complete three exams and gain at least three years of qualifying work experience, among other requirements. In passing these exams, candidates demonstrate their competence, integrity and extensive knowledge in accounting, ethical and professional standards, economics, portfolio management and security analysis.

- **Registered Health Underwriter®; The American College; 1983**

The Registered Health Underwriter (RHU®) designation is administered by The American College. Designees must complete two required and one elective college-level course covering such topics as group benefits, individual health insurance, and managed care. Additional program requirements must be met, including a minimum of three years of business experience, ethics standards and agree to comply with The American College Code of Ethics and Procedures. Continuing Education for this designation requires 30 hours every two years.



• **Certified Fund Specialist®; 1992**

The Certified Fund Specialist® (CFS®) designation is offered by The Institute of Business and Finance (IBF) to financial services professionals who successfully complete its 60-hour course focusing on mutual funds and mutual fund industry, pass a comprehensive exam, adhere to the IBF's code of ethics and complete 15 hours of continuing education courses each year.

### **Item 3 Disciplinary Information**

Jeffrey Hayden White has no reportable disciplinary history.

### **Item 4 Other Business Activities**

#### **A. Investment-Related Activities**

1. Jeffrey Hayden White is not engaged in any other investment-related activities.

2. Jeffrey Hayden White does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### **B. Non Investment-Related Activities**

Jeffrey Hayden White is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### **Item 5 Additional Compensation**

Jeffrey Hayden White does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### **Item 6 Supervision**

**Supervisor:** Mark F. Greco

**Title:** CO

**Phone Number:** 781-862-7100

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## **Item 16 Investment Discretion**

Clients may engage us to provide discretionary investment management services, in which case, we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

Wingate Wealth Advisors, Inc. also manages client accounts on a non-discretionary basis. We monitor these accounts and make investment recommendations to the client, but the client must approve these recommendations before they are implemented.

## **Item 17 Voting Client Securities**

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets. Clients are responsible for instructing each custodian of the assets, to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

## **Item 18 Financial Information**

Under no circumstances do we require or solicit prepayment of fees. Therefore, Wingate Wealth Advisors, Inc. is not required to include a financial statement.

Wingate Wealth Advisors, Inc. has no additional financial circumstances to report.



WINGATE WEALTH ADVISORS, LLC  
450 BEDFORD STREET LEXINGTON, MASSACHUSETTS 02420-1547  
PHONE: (781) 862-7100 FAX: (781) 861-9707 WINGATEWEALTHADVISORS.COM

## Our Privacy Policy

**Wingate Wealth Advisors, LLC (WWA)** is committed to safeguarding your privacy. All information provided to our firm remains in the strictest confidence. This includes all personal information that we collect from you in connection with any of the services provided by our affiliate:

- ◆ Wingate Wealth Advisors, Inc. - SEC registered investment adviser providing investment management and financial planning services.

WWA uses the personal, financial, and health information that you provide to us to help you meet your personal financial goals while guarding your rights of privacy.

Our policy with respect to personal information follows:

- We maintain a secure office and computer environment to ensure that your information is not placed at unreasonable risk.
- The categories of personal information that WWA collects from you may include information about your personal finances, your health to the extent that it is needed for the planning process, and transactions between you and third parties.
- Personal information about you will be maintained during the time that you are a client, and for the time that such records are required to be maintained by federal and state securities laws. Thereafter, all information will be destroyed.
- We share your information with third party organizations only to process products, services, or transactions on your behalf. For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm to establish an account or to execute securities transactions, or to provide information to your accountant on your behalf.
- We limit employee access to your information only to those individuals providing services or effecting transactions on your behalf.
- We make client financial information available to regulatory agencies, such as the SEC, which have the right to view all firm records, or as otherwise required by law.
- WWA does not provide your personal information to any mailing list vendors or solicitors.

WWA will notify you in advance of any change to the firm privacy policy as required by SEC Regulation S-P and the Massachusetts Privacy Law.