CURRY WEBB
Wealth Management LLC

Part 2A of Form ADV

Curry Webb Wealth Management LLC
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December 12, 2024

This brochure provides information about the qualifications and business practices of CURRY WEBB Wealth Management LLC. If you have any questions about the content of this brochure, please contact our office at (317) 999-5323. The information in this brochure has not been approved or verified by the Unites States Securities and Exchange Commission or by any state securities authority. Additional information about CURRY WEBB Wealth Management LLC ("CWWM" or the "Firm") is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for CWWM is 168692.

CURRY WEBB Wealth Management is a Registered Investment Advisor. Registration with United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 – Material Changes:

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

Since our last annual updating amendment, we have the following to report:

1. Transition filing from Indiana State to SEC Registrant.
2. Change of Principal Place of Business from 320 N. Meridian Street, Suite 828, Indianapolis, IN 46204 to 500 E 96th Street, Suite 140, Indianapolis, IN 46240. No changes in phone numbers.
3. As of 01-01-2023 WEBB Capital Management legally changed its name to CURRY WEBB Wealth Management LLC with Robert M. Curry and David S. Webb as equal 50/50 owners of the firm.

Item 3 – Table of Contents:

Item 4 – Advisory Business:

The firm was originally founded and owned by David S. Webb, on October 20th, 1994, and incorporated in the State of Indiana as an LLC on February 28, 2013. In 2022 Robert M. Curry joined the firm as an owner and subsequently on January 1, 2023, WEBB Capital Management legally changed its name to CURRY WEBB Wealth Management LLC or CWWM with Robert M. Curry and David S. Webb as equal 50/50 owners of the firm. Mr. Webb has been in the industry since 1987. He has worked as a fee-based investment advisor for over 30 years. Mr. Curry has been in the industry since 1999. He has worked for fee-based investment advisory firms for over 25 years.

CURRY WEBB Wealth Management provides customized financial planning for our clients. This process starts with an initial meeting where we gather data and discuss your financial goals and objectives. The data gathered includes getting information on your income and expenses, your liabilities, your income tax situation, your risk management coverage, your estate plan, and your assets, including your investment accounts. We then take the information and produce your initial financial plan using the best of class software. From there we monitor your plan on a regular basis to ensure it is current and accounts for changes in your lives.

CURRY WEBB Wealth Management provides investment management services, defined as providing investment advice for a fee. The investment advice is tailored to meet client needs. Our clients are most often individual investors. We begin all client relationships with an initial investment meeting to determine profile information and investment suitability. We then recommend a portfolio allocation of mutual funds and or exchange traded funds (ETFs) based on a diversified investment strategy. We continuously monitor the investments and rebalance the allocation of investments based on the portfolio's growth and the current economic environment.

We require that all clients sign a written agreement with us. We also require that you grant our firm discretionary authority, through our custodian, Charles Schwab & Company, to place trades in their respective accounts. We do not hold custody of your investment assets, just trading authorization.

As of December 6, 2024, CURRY WEBB Wealth Management has $293,810,046.60 discretionary assets under management or AUM.

Item 5 – Fees and Compensation

Financial Planning Consulting Services

Our financial planning consulting services are incorporated into our investment advisory services. There is not a separate fee for this service assuming you meet our minimum annual fee of $4,000 based on your AUM. In some rare instances, we will charge a fee for financial planning consulting if your AUM fee falls below $4,000 annually.

Investment Advisory Services

Management fees are billed quarterly, in arrears and withdrawn from clients' accounts the following month after the quarter's end. No management fees are ever paid in advance.

The firm's investment advisory services are provided in consideration of a quarterly management fee equal to 0.25% of the total market value of "all" assets under management. There are some negotiated fees schedules for large accounts, all of which are less than the stated fee schedule above. Management fees are deducted from the client's account held with Charles Schwab & Company, Inc. The client authorizes CURRY WEBB Wealth Management to deduct its quarterly fee for each account, directly from the client's account with Charles Schwab & Company, the custodian, in the month following the end of the billing quarter. The quarterly management fee of 0.25% applies to all clients. These fees occasionally may be negotiable to a lesser amount.

Your agreement with us may be terminated by either party upon written notice at any time without cause, at which time you will have the sole responsibility of managing your own account. Any accrued fees payable will be the responsibility of the client on a pro-rated basis, should either party terminate the advisory contract in the interim between billing periods. CURRY WEBB Wealth Management's primary source of compensation is our management fees which is based on regulatory assets under management. CURRY WEBB Wealth Management LLC does not receive any product commissions, custodian fees or income from any other sources. CURRY WEBB Wealth Management receives no other fees or expenses in connection with our advisory service. In using our approach, we intend to avoid any conflict of interest regarding the client's portfolio management.

The fees described above do not include certain charges imposed by third parties such as custodial and mutual fund fees and expenses. You may be subject to transaction costs, deferred sales charges on mutual funds, wire transfer and electronic fund fees, and other fees and taxes. These fees and expenses are separate from fees charged by CWWM. Clients should review fees charged by any mutual funds their assets are invested in, together with the fees charged by CWWM, to understand the total fees to be paid and evaluate the advisory services being provided.

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

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

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

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

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

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

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
    a. Employer retirement plans generally have a more limited investment menu than IRAs.
    b. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    b. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.

5. If you keep your assets in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 73.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary.
    a. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets in a 401(k) or retirement account.

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

Item 6 – Performance-Based Fees and Side-by-Side Management:

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

Item 7 – Types of Clients:

CURRY WEBB Wealth Management primarily provides investment advice to individuals and trusts with no stated account minimum. Nevertheless, it should be noted that although no separate fee is charged for our financial planning consulting services, assuming you meet our minimum annual fee of $4,000 based on your AUM, in some rare instances, we will charge you a financial planning consulting fee if your AUM fee falls below $4,000 annually.

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

CURRY WEBB Wealth Management will use a combination of research and information, including both fundamental and technical analysis regarding the selection of mutual funds and ETFs. Much of the initial information used is furnished by the fund providers. Additional due diligence is performed with unrelated entities to confirm and compare the products and their relative performance.

The overall approach is to focus on asset allocation and to use a combination of different asset classes to provide diversification. Most funds are purchased with the intent to hold them at least three years depending on on-going market conditions.

Tax Considerations

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

Risk of Loss

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

1. <u>Market Risk</u> – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of Client investments. This is also referred to as systemic risk.
2. <u>Sector risk</u> – The chance that significant problems will affect a particularsector, or that returns from that sector will trail returns from the overall stock market. Daily fluctuations in specific market sectors are often more extreme than fluctuations in the overall market.
3. <u>Non-diversification risk</u> – The risk of focusing investments on a small number of issuers, industries, or foreign currencies, including being more susceptible torisks associated with a single economic, political or regulatory occurrence than a more diversified portfolio might be.
4. <u>Equity (stock) Market Risk</u> – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held commonstock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
5. <u>Interest Rate Risk</u> – The chance that prices of fixed income securities will decline because of rising interest rates. Similarly, the income from fixed income securities can decline because of falling interest rates.
6. <u>Reinvestment Risk</u> – The risk that interest and principal payments from a bond will be reinvested at a lower yield than received on the original bond. During periods of declining interest rates, bond payments can or will be invested at lower rates; during periods of rising rates, bond payments can or will be invested at higher rates.

7. ETF and Mutual Fund Risk –. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
8. Opportunity Cost Risk –The risk that an investor can forego profits or returns from other investments.
9. Fixed Income Risk – When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.

Recommendation of Particular Types of Securities

As disclosed under the *Advisory Business* section in this brochure, we primarily recommend mutual funds, and ETFs. However, we may recommend other types of investments as appropriate since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with that investment.

Mutual Funds and ETFs: Mutual funds and exchange traded funds (ETFs) are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities.

Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and the overall health of the economy. In general, larger, better-established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

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

Private Funds. Private funds are investment vehicles that pool capital from a number of investors and invest in securities and other instruments. Private funds are structured as a private investment vehicle that is typically not registered under federal or state securities laws. To qualify to avoid registration, issuers make the funds available only to certain sophisticated or accredited investors and do not make the funds available to the general public. Most private funds offer their securities by providing an offering memorandum or private placement memorandum known as “PPM” for short. The PPM covers important information. Investors should review this document carefully, including the risk factors, and should consider conducting additional due diligence before investing. The primary risks of private funds include illiquidity and the risks associated with the underlying investments.

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. We have none to report.

Item 10 – Other Financial Industry Activities & Affiliations:

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

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics.

Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

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

Participation or Interest in Client Transactions

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

Personal Trading Practices

Our firm or persons associated with our firm do not buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account.

Item 12 – Brokerage Practices:

We recommend that clients establish brokerage accounts with Schwab Institutional a division of Charles Schwab & Co., Inc. ("Schwab"), to maintain custody of clients' assets and to effect trades for their accounts. Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the Custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, the most favorable compared to other available providers and their services. We consider various factors, including:

1. Capability to buy and sell securities for your account itself or to facilitate such services.
2. The likelihood that your trades will be executed.
3. Availability of investment research and tools.
4. Overall quality of services.
5. Competitiveness of price.
6. Reputation, financial strength, and stability.
7. Existing relationship with our firm and our other clients.

Economic Benefits

As a registered investment adviser, we have access to the institutional platform of your account custodian. As such, we will also have access to research products and services from your account custodian. These products may include financial publications, information about particular companies and industries, research software, and other products or services that provide lawful and appropriate assistance to our firm in the performance of our advisory responsibilities. Such research products and services are provided to all investment advisers that utilize the institutional services platforms of these firms, and are generally not considered to be paid for with soft dollars. However, you should be aware that the commissions charged by a particular broker for a particular transaction or set of transactions may be greater than the amounts another broker who did not provide research services or products might charge.

Schwab - Your Custody and Brokerage Costs

For our clients' accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Our relationship with Schwab benefits you because the overall commission rates and/or asset-based fees you pay are lower than they would be if we had not made the commitment. In addition to commission rates and/or asset-based fees Schwab charges you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker- dealer. Because of this, we use Schwab services for the benefit of our clients' accounts.

Our Interest in Schwab's Services

The availability of Schwab services benefits us because we do not have to produce or purchase them. These services give us an incentive to recommend that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality, and price of Schwab's services as discussed above and not Schwab's services that benefit only us. We do not believe that maintaining our client's assets at Schwab for services presents a material conflict of interest.

Nevertheless, you always have the right, contractually or otherwise, to go with another broker- dealer that offers to maintain custody of your assets and to effect trades for your account(s).

Research and Other Soft Dollar Benefits

Please refer to section above.

Brokerage for Client Referrals

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

Directed Brokerage

We routinely recommend that you direct our firm to execute transactions through Charles Schwab & Co., Inc. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Item 13 – Review of Accounts:

Our team regularly reviews all investments held by Curry Webb Wealth Management. Our Investment Committee meets every 2 weeks to discuss the positions held in client accounts and to present new ideas to the team. In most cases, we meet regularly throughout the year to provide the client with a thorough review of their portfolio. This includes a discussion of the asset allocation, the performance of each position, and a review of any material changes in the portfolio. At a minimum, this happens at least once a year.

Clients receive monthly statements from the custodian, Schwab, on every account. Clients also receive, from Schwab, a trade confirmation each time a security is bought or sold in their account. Charles Schwab & Company will also provide all clients with a year-end 1099, a 1099-D, and a 1099-B along with the monthly statements.

CURRY WEBB Wealth Management LLC produces performance reports quarterly that show the portfolio performance, asset allocation, and position specific results. This report is uploaded and stored in the Vault section of the client portal and is available for future reference.

Item 14 – Client Referrals and Other Compensation:

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

Charles Schwab & Co., Inc - Institutional

In addition, we receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12 - Brokerage Practices). The availability to us of Schwab's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

Item 15 – Custody of Client Funds:

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

If you have a question regarding your account statement, or if you did not receive a statement from your custodian, please contact us immediately using the telephone number on the cover page of this brochure. Our firm, or persons associated with our firm, may affect wire transfers, such as certain ACH (Automated Clearing House) and Journal transfers, from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization or SLOA. An adviser with authority to conduct such third- party wire transfers have access to the client's assets, and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes
2. the third party's name and address or account number at a custodian;
3. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
4. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
5. You can terminate or change the instruction;
6. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
7. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
8. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

Item 16 – Investment Discretion:

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement, and the appropriate trading authorization forms.

If you enter into a discretionary arrangement, you must grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Refer to the *Advisory Business* section in this brochure for more information on our discretionary management services.

Item 17 – Voting Client Securities:

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

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

Item 18 – Financial Information:

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and we do not require prepayment of more than $1200 in fees six or more months in advance nor have we filed a bankruptcy petition at any time in the past ten years. Therefore, we are not required to include a financial statement with this brochure.

Item 19 – Additional Information

Your Privacy

CURRY WEBB Wealth Management views protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure. We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

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

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

Trade Errors

In the event a trading error occurs in your account, CURRY WEBB Wealth Management's policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. Should there be a profit when a trade error occurs, then the client will keep the profit.