Item 1 - Cover Page

WESPAC Advisors, LLC
4 Orinda Way, Suite 100-B
Orinda, CA 94563
(800) 535-4253
(510) 287-5255
www.wespac.net

September 13, 2023

This brochure provides information about the qualifications and business practices of WESPAC Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at one of the numbers listed above and/or send a message to advisory@wespac.net. 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.

WESPAC is a registered investment advisor. Registration of an investment advisor does not imply any level of skill or training.

Additional information about WESPAC Advisors, LLC also is available on the SEC's website at www.advisorinfo.sec.gov. The searchable CRD number for WESPAC Advisors, LLC is 148242.

Item 2 - Material Changes

SEC-registered investment advisers are required to provide their clients with a summary of any material changes to their Form ADV 2A brochure ("Brochure") since their last annual updating amendment and offer to provide the entire Brochure free of charge.

On August 31, 2023, funds affiliated with Clayton, Dubilier & Rice, LLC ("CD&R") and Stone Point Capital LLC ("Stone Point") completed an acquisition of Focus Financial Partners Inc. ("Focus Inc."). This transaction resulted in funds affiliated with CD&R collectively becoming majority owners of Focus Inc. and funds affiliated with Stone Point collectively becoming owners of Focus Inc. Because WESPAC Advisors, LLC is an indirect, wholly-owned subsidiary of Focus Inc., the CD&R and Stone Point funds are indirect owners of WESPAC Advisors, LLC. Items 4 and 10 have been revised to reflect this new ownership structure.

Clients are encouraged to review the Brochure in its entirety. Clients may obtain a copy of our Brochure at any time, free of charge, by contacting us at advisors@wespac.net or by telephone at (800) 535-4253.

Item 3 - Table of Contents

Item 4 - Advisory Business

A. WESPAC Advisors is part of the Focus Financial Partners, LLC ("Focus LLC") partnership. Specifically, WESPAC Advisors is a wholly owned subsidiary of Focus Operating, LLC ("Focus Operating"), which is, directly and indirectly, a wholly owned subsidiary of Focus LLC. Focus Financial Partners Inc. ("Focus Inc.") is the sole managing member of Focus LLC and has 100% of its governance rights. Accordingly, all governance is conducted through the voting rights and the Board of Directors at Focus Inc. Focus Inc. is the managing member of and owns, directly and indirectly, approximately 99% of the economic interest in Focus LLC.

Focus Inc. is majority-owned, indirectly and collectively, by funds affiliated with Clayton, Dubilier & Rice, LLC ("CD&R"). Funds affiliated with Stone Point Capital LLC ("Stone Point") are indirect owners of Focus, Inc. Because WESPAC Advisors is an indirect, wholly-owned subsidiary of Focus, Inc., CD&R and Stone Point funds are indirect owners of WESPAC Advisors.

Focus LLC also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, business managers and other firms (the "Focus Partners"), most of which provide wealth management, benefit consulting and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs.

B. We have two primary lines of business: providing investment advisory and fiduciary oversight services to participant-directed retirement plans and providing investment management services to high-net-worth clients in separately managed accounts. Services may be customized depending on the client's needs.

We provide investment advisory services to the plan sponsors of participant-directed retirement plans to plan, develop, design, implement and administer an investment program based on the client's goals and needs. This typically includes providing the client with an investment policy statement, analyzing, and recommending the mutual funds and asset allocation portfolios to be included on the plan investment menu, monitoring those selections on an ongoing basis, and providing investment advice to the plan participants through group meetings, individual meetings or phone consultation. The plan sponsor is sent a report each quarter and investment data and financial tools are available to participants through our interactive participant website. We will also take on the role of ERISA 3(21) co-fiduciary or ERISA 3(38) designated fiduciary over the plan assets. We also provide investment management services to individuals, trustee-directed plans (typically defined benefit pension plans), trusts, and corporations. Certain legacy client assets are sub advised by WESPAC Advisors SoCal, LLC d/b/a Stonemark Wealth Management, an SEC-registered investment adviser that formerly was affiliated with us. After obtaining information regarding clients' investment objectives, financial circumstances, and risk tolerance, we typically invest client assets in strategies managed in accordance with our investment models. Some of our clients' assets are managed by a sub-adviser.

C. We determine appropriate investment strategies for clients after assessing the client's investment objectives and risk tolerance. Clients with similar risk and return objectives will have these allocations implemented uniformly through the use of investment models. Clients are permitted to impose reasonable restrictions on the management of their accounts.

D. WA does not take part in any wrap fee programs.

E. As of 12/31/2022, we managed $800,064,104 on a discretionary basis.

F. We are a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA") with respect to investment management services and investment advice provided to ERISA plan clients, including plan participants. We are also a fiduciary under section 4975 of the Internal Revenue Code (the "IRC") with respect to investment management services and investment advice provided to individual retirement accounts ("IRAs"), ERISA plans, and ERISA plan participants. As such, we are subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption (a "PTE").

As a fiduciary, we have duties of care and of loyalty to you and are subject to obligations imposed on us by the federal and state securities laws. As a result, you have certain rights that you cannot waive or limit by contract. Nothing in our agreement with you should be interpreted as a limitation of our obligations under the federal and state securities laws or as a waiver of any unwaivable rights you possess.

Item 5 - Fees and Compensation

A. Our investment advisory fees are based on an annual percentage of client assets under our management. Our maximum fee schedule is as follows:

	Portfolio Asset Value	Annual Fee Rate
First	$1,000,000	1.25%
Next	$1,000,000	1.15%
Next	$1,000,000	1.05%
Next	$2,000,000	0.95%
Over	$5,000,000	0.85%

Our fees are negotiable and may be waived in certain circumstances, as in the case of employee accounts. Our investment advisory fee includes any advisory fees of any sub-advisers; that is, we pay any sub-advisers directly from the advisory fees paid to us.

B. Clients typically grant us authority to deduct our fees directly from client's account. However, we will also bill directly for fees if that is a client's preferred option. Fees are billed quarterly in advance and calculated based on the market value (provided by each client's independent custodian) of each client account as of the last day of the applicable quarter. Cash, accrued interest and the value of any securities held on margin are included for billing purposes, unless we determine otherwise, in our discretion.

In situations where a new retirement plan client is engaged and customer funds are transferred in at various points during the first quarter of engagement, we have a slightly different method of calculating fees. Here we would use the weighted average of the monthly balances during the quarter and then pro-rate it based on the number of days money was actually in the account. We are using this method so as not to overly penalize a client in the event that a large conversion balance is transferred in near the end of a quarter. The following is an illustration:

Balance as of:	Scenario 1	Scenario 2	Scenario 3
1/31/2013	$ 3,500.00	-	-
2/28/2013	$ 7,000.00	$ 7,000.00	-
3/31/2013	$ 325,000.00	$ 325,000.00	$ 325,000.00
	$ 335,500.00	$ 332,000.00	$ 325,000.00
divided by # of months	$ 111,833.33	$ 166,000.00	$ 325,000.00
Date money first enters the account	1/15	2/15	3/15
Fee would =	(76/90*.001875*$111,833.33)		
	$ 177.07	$ 155.63	$ 108.33

C. In addition to our fees, clients are responsible for fees, expenses and charges imposed by third parties in connection with the investment and maintenance of their assets. These fees, expenses and charges could potentially include brokerage commissions or securities transaction fees and other expenses and charges imposed by the client's custodian and/or broker-dealer, or custodial fees. Investment companies (mutual funds, ETFs, etc.) in which a client's assets may be invested charge additional management fees and other expenses as described in the fund's prospectus. Please also refer to Items 12-15 of this Brochure for more information regarding our brokerage and trading practices.

D. Because we charges our fees in advance, any clients who terminate our advisory services during the course of a quarter will receive a pro-rata refund for any unused pre-paid portion of any advisory fees based on how many days remain in that calendar quarter. The pro-rata refund is calculated from the date we receive a notice of termination.

Supervised persons of the Firm from time-to-time receive typical and customary commissions from the recommendation and sale of insurance products. One of our related persons is a li- censed agent of a WA affiliate, WESPAC Benefits & Insurance Services, LLC ("WBIS"), an insur- ance brokerage firm. To the extent that a client purchases insurance the related person recom- mends, WBIS and/or the related persons will receive commission from the applicable insurance company. Advisory clients should understand this represents a conflict as there is an incentive for these persons to recommend products for which they receive compensation. We address this conflict through disclosure and make recommendations we reasonably believe to be in the best interests of its clients. Additionally, advisory clients are under no obligation to utilize these services. Our related persons are prohibited from selling insurance products to clients where such sale would be deemed a Prohibited Transaction under ERISA.

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

We do not have any arrangements where we charge performance based fees, so this item is inapplicable to our firm.

Item 7 - Types of Clients

We advise a variety of client types, including plan sponsors of self-directed and trustee-directed retirement plans, individuals, testamentary trusts, corporations and other forms of business entities.

We usually require prospective clients who are individuals or trustee-directed retirement plans to have a minimum of $250,000 to invest with us ($5,000 if the client is a self-directed retirement plan), but retain the discretion to waive the minimum under appropriate circumstances.

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

Our investment strategies for taxable clients primarily involve top down sector rotation and relative strength investing. We invest primarily in equity securities and exchange-traded funds selected primarily on the basis of technical research, yet supported by fundamental research. The synthesis of these types of analysis helps us decide in which securities we want to invest based on their overall valuation levels and growth stories. In addition, it also helps us to determine price targets, good entry points for various securities, areas of relative strength in the financial markets, and proper price levels to set stop loss points in portfolios where we may to engage in risk management.

For self-directed retirement plan clients, we primarily select no-load mutual funds.

Other investment types, such master limited partnerships, covered call options, and even other independent money managers may be used if the advisor and client agree it is an appropriate strategy for the client.

Risk of Loss:

Investing in securities involves a risk of loss that clients should be prepared to bear. Different investments involve varying types and degrees of risk. All investments present the risk of loss of principal – the risk that the value of securities, when sold or otherwise disposed of, may be less than the price paid for the securities. Investing in portfolios of equity securities (stocks) exposes clients to the risk of substantial loss. In fact, four times in just over 20 years (2001, 2002, 2008, and 2020) many market participants heavily invested in equity securities experienced double-digit losses. While the pandemic-induced decline of 34% in late February and March 2020 ended up being the shortest bear market in history, the broad market as measured by the S&P 500 declined more than 49% from October 2007 through March 2009 during the financial crisis.

Clients should not assume that future performance of any specific investment, including those recommended by the Firm, will be profitable or attain specific performance levels.

The mutual funds exchanged traded funds (ETFs) equity securities (stocks) we recommend and invest client assets in generally own financial securities that involve the risk of loss that is inherent in investing in stocks, bonds, and the financial markets generally. The extent of the risk of ownership of fund shares depends on the type and number of securities held by the fund. Mutual funds invested in fixed income securities are subject to the same interest rate, inflation, and credit risks associated with the fund's underlying bond holdings. Fixed income securities may decrease in value as a result of many factors, for example, increases in interest rates or adverse developments with respect to the creditworthiness of the issuer. Risks also may be significantly increased if a mutual fund pursues an alternative investment strategy. An investment in an alternative mutual fund involves special risks such as risk associated with short sales, leveraging the investment, potential adverse market forces, regulatory changes, and potential illiquidity. Returns on mutual fund investments are reduced by management costs and expenses.

An ETF's risks include declining value of the securities held by the ETF, adverse developments in the specific industry or sector that the ETF tracks, capital loss in geographically focused funds because of unfavorable fluctuation in currency exchange rates, differences in generally accepted accounting principles, or economic or political instability, tracking error, which is the difference between the return of the ETF and the return of its benchmark and trading at a premium or discount, meaning the difference between the ETF's market price and NAV. ETFs also are subject to the individual risks described in their prospectus. Although many mutual funds and ETFs may provide diversification, risks can be significantly increased if a mutual fund or ETF is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage to a significant degree, or concentrates in a particular type of security. One of the main advantages of mutual funds and ETFs is that they give individual investors access to professionally managed, diversified portfolios of equities, bonds and other securities.

Although the goal of diversification is to combine investments with different characteristics so that the risks inherent in any one investment can be balanced by assets that move in different cycles or respond to different market factors, diversification does not eliminate the risk of loss. In some circumstances, price movements may be highly correlated across securities and funds. A specific fund may not be diversified, and a client portfolio may not be diversified. Additionally, when diversification is a client objective, there is risk that the strategies that the Firm uses may not be successful in achieving the desired level of diversification. There is also risk that the strategies, resources, and analytical methods that the Firm uses to identify mutual funds and ETFs will not be successful in identifying investment opportunities.

The following events also could cause mutual funds, ETFs, equities and other investments managed for clients to decrease in value:

- **Market Risk**: The price of an equity security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, changes in political, economic and social conditions may trigger adverse market events.

- **Interest-rate Risk**: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- **Event Risk**: An adverse event affecting a particular company or that company's industry could depress the price of a client's investments in that company's stocks or bonds. The company, government or other entity that issued bonds in a client's portfolio could become less able to, or fail to, repay, service or refinance its debts, or the issuer's credit rating could be downgraded by a rating agency. Adverse events affecting a particular country, including political and economic instability, could depress the value of investments in issuers headquartered or doing business in that country.

- **Liquidity Risk**: Securities that are normally liquid may become difficult or impossible to sell at an acceptable price during periods of economic instability or other emergency conditions. Some securities may be infrequently or thinly traded even under normal market conditions.

- **Leverage Risk**: The use of leverage may lead to increased volatility of a fund's NAV and market price relative to its common shares. Leverage is likely to magnify any losses in the fund's portfolio, which may lead to increased market price declines. Fluctuations in interest rates on borrowings or the dividend rates on preferred shares that take place from changes in short- term interest rates may reduce the return to common shareholders or result in fluctuations in the dividends paid on common shares. There is no assurance that a leveraging strategy will be successful.

- **Domestic and/or Foreign Political Risk**: The events that occur in the U.S. relating to politics, government, and elections can affect the U.S. markets. Political events occurring in the home country of a foreign company such as revolutions, nationalization, and currency collapse can have an impact on the security.

- **Inflation Risk**: Countries around the globe may be more, or less, prone to inflation than the U.S. economy at any given time. Companies operating in countries with higher inflation rates may find it more difficult to post profits reflecting its underlying health.

- **Currency Risk**: Overseas investments are subject to fluctuations in the value of the U.S. dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

- **Reinvestment Risk**: This risk is that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

- **Operational Risk**: fund Advisors and other ETF service providers may experience disruptions or operating errors such as processing errors or human errors, inadequate or failed internal or external processes, or systems or technology failures, that could negatively impact the ETF.

- **Regulatory/Legislative Developments Risk**: Regulators and/or legislators may promulgate rules or pass legislation that places restrictions on, adds procedural hurdles to, affects the liquidity of, and/or alters the risks associated with certain investment transactions or the securities underlying such investment transactions. Such rules/legislation could affect the value associated with such investment transactions or underlying securities.

Cryptocurrency Risk:

Cryptocurrency is a digital representation of value that functions as a medium of exchange, a unit of account, or a store of value, but it does not have legal tender status. Cryptocurrencies are sometimes exchanged for U.S. dollars or other world currencies, but they are not gener- ally backed or supported by any government or central bank. They are more volatile than traditional currencies. Their value is speculative, given that they are not currently, widely ac- cepted as a medium or exchange, is derived by market forces of supply and demand, and may be impacted by the continued willingness of market participants to exchange fiat currency for cryptocurrency. Cryptocurrencies are not covered by either FDIC or SIPC insurance. Bitcoin, Ethereum and other cryptocurrencies are very speculative investments and involve a high degree of risk. An investment in cryptocurrency is not suitable for all investors, and may not generally be appropriate, particularly with funds drawn from retirement savings, student loans, mortgages, emergency funds, or funds set aside for other purposes. Investors must have the financial ability, sophistication/experience and willingness to bear the risks of an investment, and a potential total loss of their investment. An investment in cryptocurrency should be made with capital allocated to speculative purposes. Fees and expenses associated with a cryptocurrency investment may be substantial.

Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. Investments that are related to cryptocurrencies could be subject to volatility experienced by the cryptocurrency exchanges and other cryptocurrency trading venues. Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware, which may also affect the price of bitcoin and other cryptocurrencies and indirect investments in cryptocurrencies.

In addition to the risks above, clients should consider the following risks:

- History of volatility. The exchange rate of cryptocurrency historically has been very vola tile, and the exchange rate of a cryptocurrency could drastically decline. For example, the exchange rate of Bitcoin has dropped more than 50% in a single day. Cryptocurrency-related investments may be affected by such volatility.

- Government regulation. Cryptocurrencies largely lack regulatory protections. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency. Legislative and regulatory changes or actions at the federal, state or international level may adversely affect the use, transfer, exchange, and value of cryptocurrency.
- Security concerns. Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Cryptocurrency also may be stolen by hackers.
- New and developing. As a relatively recent invention, cryptocurrency and related investments do not have an established track record of operating history, performance, credibility and/or trust. Bitcoin and other cryptocurrencies are evolving. Cryptocurrencies use blockchain technology, which lacks standardization.

Cybersecurity:

The computer systems, networks and devices used by WESPAC and service providers to us and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future."

COVID-19 Risk Disclosure

The transmission of COVID and efforts to contain its spread have resulted in border closings and other travel restrictions and disruptions, market volatility, disruptions to business operations, supply chains and customer activity and quarantines. With widespread availability of vaccines, the U.S. Centers for Disease Control and Prevention has revised its guidance, travel restrictions have started to lift, and businesses have reopened. However, the COVID pandemic continues to evolve and the extent to which our investment strategies will be impacted will depend on various factors beyond our control, including the extent and duration of the impact on

economies around the world and on the global securities and commodities markets. Volatility in the U.S. and global financial markets caused by the COVID pandemic may continue and could impact our firm's investment strategies.

Although currently there has been no significant impact, the COVID outbreak, and future pandemics, could negatively affect vendors on which our firm and clients rely and could disrupt the ability of such vendors to perform essential tasks.

Item 9 - Disciplinary Information

As a registered investment advisor, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's or prospective client's evaluation of our business or the integrity of our management personnel. We have no reportable legal or disciplinary events to disclose.

Item 10 - Other Financial Industry Activities and Affiliations

As noted above in response to Item 4, certain funds affiliated with CD&R collectively are indirect majority owners of Focus Inc., and certain funds affiliated with Stone Point are indirect owners of Focus Inc. Because WESPAC Advisors is an indirect, wholly-owned subsidiary of Focus Inc., CD&R and Stone Point investment vehicles are indirect owners of WESPAC Advisors.

WESPAC Advisors does not believe the Focus Partnership presents a conflict of interest with our clients. WESPAC Advisors has no business relationship with other Focus Partners that is material to its advisory business or to its clients.

As discussed in response to Item 5 above, one of our related persons is a licensed agent of a WA affiliate, WESPAC Benefits & Insurance Services, LLC ("WBIS"), an insurance brokerage firm. To the extent that a client purchases insurance the related person recommends, WBIS and/or the related persons will receive commission from the applicable insurance company. Advisory clients should understand this represents a conflict as there is an incentive for these persons to recommend products for which they receive compensation. We address this conflict through disclosure and make recommendations we reasonably believe to be in the best interests of its clients. Additionally, advisory clients are under no obligation to utilize these services. Our related persons are prohibited from selling insurance products to clients where such sale would be deemed a Prohibited Transaction under ERISA.

We and our related persons will refer clients who request qualified retirement plan administrative and record-keeping services to our affiliate, WESPAC Plan Services, LLC (“WPS”), an entity under common ownership with WESPAC Advisors. WPS and its clients enter into an administration agreement and the clients pay WPS a separate fee. WESPAC Advisors and its related persons receive fees from these plans for supervising the plan’s portfolio and recommending investments to be made available to plan participants. Advisory clients should understand this represents a conflict as there is an incentive to recommend such affiliates for administrative and recordkeeping services as there is economic benefit due to the receipt of compensation by the affiliates and or the related persons. We address this conflict through disclosure and make recommendations we reasonably believe to be in the best interest of our clients. Additionally, advisory clients are under no obligation to utilize these services.

A small number of our client accounts are managed pursuant to a subadvisory agreement with Stonemark Wealth Management (“Stonemark”), a firm whose advisers formerly were affiliated with WESPAC Advisors. We pay Stonemark’s fee from the advisory fees we receive from those clients.

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

We have adopted a Code of Ethics (the “Code”) which requires our personnel to comply with their legal obligations and fulfill the fiduciary duties owed to our clients. Among other things, the Code of Ethics sets forth policies and procedures related to conflicts of interest, outside business activities, gifts and entertainment, compliance with insider trading laws and policies and procedures governing personal securities trading by our access persons. Personal securities transactions of advisory personnel present potential conflicts of interest with the price obtained in client securities transactions or the investment opportunity available to clients. The Code addresses these potential conflicts by requiring, with certain exceptions, access persons to report their personal securities holdings and transactions to the Firm for review by compli- ance personnel, and by requiring access persons to obtain preclearance prior to investing in private placements or initial public offerings. The Code also prohibits securities trades that would breach a fiduciary duty to a client, short sales in securities that are held long in client accounts, transactions in securities on our restricted list, and transactions that would constitute insider trading or market manipulation.

We will provide a copy of the Code of Ethics to any client or prospective client upon request.

Item 12 - Brokerage Practices

We have a long-standing relationship with Charles Schwab & Co., Inc. (Schwab), and, at our recommendation, most of our client accounts are custodied there. A small percentage of client assets are custodied, at our recommendation, with TD Ameritrade (TDA). Clients’ use of custodians we recommend permits us to aggregate the purchase and sale of securities through block trading and help us obtain favorable pricing for the cost of client securities transactions. Moreover, both firms are currently offering trading commissions at extremely competitive and favorable prices.

Schwab and TD Ameritrade provide us with access to tools that assist us with managing and servicing clients' securities portfolios. They also offer advisers on their platforms access to products and services which may help us to manage and grow our business enterprise. Because of our relationship with Schwab, we sometimes qualify for third party discounts to various products related to our practice.

Item 12A.1. - Research and Other Soft Dollar Benefits

We do not currently have soft dollar arrangements in which a broker-dealer provides research and brokerage services accrued from client securities transactions. Schwab and TD Ameritrade provide us with research and other services that assist in the management of client accounts because our clients custody their assets with the firms. Schwab also pays for various investment and professional related research materials, software programs, publications, newsletters, website maintenance fees, educational seminars for clients and staff, and registration fees for attendance at professional and technical conferences and seminars. These services are a benefit to us because we do not have to pay for them.

WESPAC Advisors acknowledges that the firm owes a duty of best execution with respect to transactions executed through the custodians and brokers we recommend; however, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the adviser 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 we will seek competitive rates, we may not necessarily obtain the lowest possible commission rates for client account transactions.

Item 12A.2. - Brokerage for Client Referrals

WESPAC Advisors has in the past received client referrals from Charles Schwab & Co., Inc. ("Schwab") through our participation in Schwab Advisor Network, a service designed to help investors find an independent investment advisor. We continue to pay Schwab a participation fee on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on any accounts that are maintained at, or transferred to, another custodian. We are no longer receiving referrals of new clients from Schwab.

Item 12A.3. - Directed Brokerage

Generally, WESPAC Advisors is retained by clients on a discretionary basis and authorized to determine and direct execution of portfolio transactions, without consultation with the client on a transaction-by-transaction basis. However, the client may limit discretionary authority in terms of type or amount of mutual funds and other securities to be bought or sold.

WESPAC Advisors, does not have discretion as to the broker dealer to be used for executing trades. Clients must direct us as to the broker or dealer to be used. In directing the use of a particular broker or dealer, clients should understand that we will not seek more favorable execution from other broker-dealers. Not all advisers require their clients to enter into directed brokerage arrangements.

Item 13 - Review of Accounts

Investment Management accounts are reviewed quarterly or more often, as requested by the client or as dictated by certain triggering events. Triggering events include but are not limited to: changes in clients' circumstances, federal or state legislation, regulatory and political events such as changes in monetary policy, interest rates, large market fluctuations, mergers, rating agency changes and corporate restructuring.

Clients will receive from their custodian trade confirmations and monthly statements. For accounts we manage directly, clients will receive a written quarterly report that typically includes the following information: Portfolio value at the beginning and end of the quarter, contributions, withdrawals, realized capital gains and losses, interest, dividends, management fees, and time-weighted rate of return for the quarter and year to date. Reports may (but not always) include a letter written to the client and/or market commentary. The custodial broker dealer or trust company will provide the client with a form 1099 after the close of each calendar year.

Clients for whom we manage accounts directly will sometimes receive an electronic newsletter from us. The format of the newsletter has evolved over time but generally provides high level commentary on recent financial market news and may highlight one of our investment strategies.

Item 14 - Client Referrals and Other Compensation

WESPAC Advisors' parent company is Focus Financial Partners, LLC ("Focus"). From time to time, Focus holds partnership meetings and other industry and best-practices conferences, which typically include WESPAC Advisors, other Focus firms and external attendees. These meetings are first and foremost intended to provide training or education to personnel of Focus firms, including WESPAC Advisors. However, the meetings do provide sponsorship opportunities for asset managers, asset custodians, vendors, and other third-party service providers. Sponsorship fees allow these companies to advertise their products and services to Focus firms, including WESPAC Advisors. Although the participation of Focus firm personnel in these meetings is not preconditioned on the achievement of a sales target for any conference sponsor, this practice could nonetheless be deemed a conflict as the marketing and education activities conducted, and the access granted, at such meetings and conferences could cause WESPAC Advisors to focus on those conference sponsors in the course of its duties. Focus attempts to mitigate any such conflict by allocating the sponsorship fees only to defraying the cost of the meeting or future meetings and not as revenue for itself or any affiliate, including WESPAC Advisors. Conference sponsorship fees are not dependent on assets placed with any specific provider or revenue generated by such asset placement.

The following entities have provided conference sponsorship to Focus from January 1, 2022, to March 1, 2023:

Charles Schwab & Co., Inc.

TriState Capital Bank

StoneCastle Network, LLC

BlackRock, Inc.

Fidelity Brokerage Services LLC

Fidelity Institutional Asset Management LLC

You can access a more recently updated list of recent conference sponsors on Focus' website through the following link:

https://focusfinancialpartners.com/conference-sponsors/

WESPAC Advisors has arrangements in place with certain third parties, called solicitors, under which such solicitors refer clients to us in exchange for a percentage of the advisory fees we collect from such referred clients. Such compensation creates an incentive for the solicitors to refer clients to us, which is a conflict of interest for the solicitors. Rule 206(4)-1 of the Advisers Act addresses this conflict of interest by, among other things, requiring disclosure of whether the solicitor is a client or a non-client and a description of the material conflicts of interest and material terms of the compensation arrangement with the solicitor. Accordingly, we require solicitors to disclose to referred clients, in writing: whether the solicitor is a client or a non-client; that the solicitor will be compensated for the referral; the material conflicts of interest arising from the relationship and/or compensation arrangement; and the material terms of the compensation arrangement, including a description of the compensation to be provided for the referral.

Item 15 - Custody

WESPAC Advisors does not have physical custody of client assets, but we have legal custody over client assets when we have the authority to debit fees directly from client accounts. Because we use third party custodians like Schwab and TD Ameritrade for client accounts, clients will receive account statements from those entities and should carefully review them. We urge clients to compare the portfolio performance reports that we send out on a quarterly basis to the account statements that they receive from the custodians and to review custodial statements for fee calculations.

WESPAC Advisors has legal custody of client assets as a result of having the authority to instruct custodians to act on standing instructions to transfer client assets to third parties. We rely on SEC no action relief from the requirement to obtain a custody audit with respect to such assets.

In addition to having legal custody under the foregoing circumstances, custody is imputed to us because our affiliate, WESPAC Plan Services, a recordkeeper and third party retirement plan administrator, has the authority to direct custodians to disburse client assets to third parties. We retain an independent auditor on an annual basis to conduct surprise examinations to verify client assets over which WESPAC Plan Services has disbursement authority.

Item 16 - Investment Discretion

For clients for whom we directly manage accounts, we are generally retained on a discretionary basis and authorized to determine and direct execution of portfolio transactions, without consultation with the client on a transaction by transaction basis. However, the client may limit discretionary authority in terms of type or amount of mutual funds and other securities to be bought or sold. The discretionary investment management agreement clients sign gives us full power and authority to make all investment decisions on a discretionary basis for portfolio assets designated for management by WESPAC Advisors.

Item 17 - Voting Client Securities

Clients may choose to have WESPAC Advisors vote proxies on its behalf. This is the standard arrangement that we have with clients whose accounts we vote on a discretionary basis. In this regard, we have adopted proxy voting policies and procedures, and engages Broadridge, a third party proxy voting vendor, to vote client proxies through its ProxyEdge service. This third party service provider automatically votes on securities held in client accounts based on research provided by one of their partner firms, Glass Lewis. Upon request, at any time a client may receive a copy of our Proxy Voting Policy as well as a record of how each proxy pertaining to a Client account was voted. Clients may request the proxy voting policies as well as the voting record via written request to WESPAC Advisors, LLC, 4 Orinda Way, Suite 100-B, Orinda, CA 94563.

Item 18 - Financial Information

The SEC requires advisers who require prepayment of advisory fees of $1,200 or more, six months or more in advance, to provide a balance sheet. We do not require or solicit prepayment of more than $1,200 in fee per client, six months or more in advance. In addition, we have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, we have not been the subject of a bankruptcy petition anytime in the past 10 years.

Item 19 - Requirements for State-Registered Advisors

This is not applicable since we are not registering with any state securities authorities.