Item 1 – Cover Page Part 2A of Form ADV: Firm Brochure

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Contact person: Gregory Brown Chief Compliance Officer

This Brochure provides information about the qualifications and business practices of West Coast Capital Management, LLC, CRD Number 141981. If you have any questions about the contents of this Brochure, please contact us at 480-460-3790.

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.

West Coast Capital Management, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser. Additional information about West Coast Capital Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

West Coast Capital Management, LLC is required to make clients aware of information that has changed since the last annual update to the Firm Brochure ("Brochure") and that may be important to them. Clients can then determine whether to review the brochure in its entirety or to contact us with questions about the changes.

Since our Annual Updating Amendment on March 15, 2024, there have been the following material changes to this Brochure:

- Item 5 has been amended to reflect our current fees for management and planning.
- Item 12 has been amended to reflect our brokerage practices more thoroughly.
- Item 8 has been amended to disclose risks associated with buffered ETFs.
- Item 14 has been amended to disclose our relationship with SmartAsset.

Item 3 – Table of Contents

Item 4 – Advisory Business

West Coast Capital Management, LLC ("West Coast") is owned by Gregory Brown and has been providing advisory services since November 29, 2006. It is a registered investment adviser in the state of Arizona, California, and Oregon.

We provide assistance to people from all walks of life and specialize in retirement planning and fee-based asset management selection services. We tailor our services to the unique needs of individual clients. Services are provided to individuals and families. All material conflicts of interest under CCR Section 260.238 (k) are disclosed below regarding our firm, our representatives, or our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. To comply with CCR Section 260.238(j), we disclose that lower fees for comparable services may be available from other sources.

Description of the Types of Advisory Services We Offer

Asset Management:

As part of our asset management service, a portfolio is created, consisting of individual stocks, bonds, exchange traded funds ("ETFs"), mutual funds, commercial paper, cash, and closed-end funds in securities to accomplish this objective on Charles Schwab platform. The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities.

For accounts where we have trading discretion, we will allocate a client's account opened at Schwab among models. We make available models of third-party managers as well as models developed by West Coast. Under this scenario, we will help the client select a model portfolio of securities designed by us or by a select portfolio management firm. This authorization will be set out in our agreement. The minimum initial investment for the Program is $100,000, although this is negotiable depending on the client household, relationship, type and size of account. Under non-discretionary arrangements, we will monitor your holdings and make suggestions, but will require your explicit permission to place trades in your accounts.

We also utilize Third-Party Firms to aid in the implementation of an investment portfolio designed by our firm. In this case, we design an investment portfolio on a fee-only basis for a percentage of assets in conjunction with another investment advisory firm. Before selecting other advisers, we make sure that the other advisers are properly licensed or registered. These managers' primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. These manager's primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. They may use mutual funds, ETFs, stocks, bonds, unit investment trusts, real estate investment trusts, commercial paper, cash, closed end funds, Structured Products (including certificates of deposit and notes), and options in securities to accomplish this objective. The manager may redistribute assets within these different investments as market conditions change in the manager's effort to reduce risk and increase performance. West Coast monitors the performance and investment styles of the third-party firms to make sure they are acting in accordance with the client's investment goals, and when necessary, make recommendations to use other portfolios offered by the same third-party firms, or change third-party firms altogether.

Financial Planning & Consulting:

West Coast also offers comprehensive financial planning services for individuals, families and businesses. Our financial planning services include data gathering and analysis, along with creating a financial plan with specific recommendations and implementation advice tailored to client needs. Specific areas of advice include investment planning, insurance needs assessment and advice, retirement planning, cash flow management, debt consolidation, capital needs assessments, educational planning, estate planning and business planning.

CCR Section 260.235.2 requires that we disclose to our financial planning clients that a conflict of interest exists between us and our clients. The client is under no obligation to act upon the investment adviser's recommendation. If the client elects to act on our recommendations, the client is under no obligation to effect the transaction through us.

For clients that wish to engage us on an ongoing consulting basis, rather than for the creation of a financial plan, they may engage us under a financial consulting agreement. Under this agreement, we will offer ongoing consulting regarding client brokerage accounts encompassed by the consulting agreement and recommend actions to the client. Under this agreement, we will not maintain trading authority within the account, and the client will be responsible for taking any action recommended by us. We shall not be responsible for ongoing monitoring of the client's accounts under this agreement but shall review the accounts upon each request by client and/or consulting meeting with client. Upon advising the client to take any action under this agreement, that advice shall only be valid for the point in time at which the advice is given. This agreement shall be ongoing unless terminated by either party by giving 3 days notice.

Tailoring of Advisory Services

We offer individualized investment advice to clients utilizing our Asset Management service. Additionally, we offer general investment advice to clients utilizing our Financial Planning & Consulting, service. The above listed advisory services can be tailored to each client-as such, if any client requires any restrictions on any type of stocks or market segments, the client needs to inform their Advisory Representative of the restrictions in writing. If, for any reason, the firm is no able to meet the client restrictions, the form will notify the client of that fact so that the client can determine their requirements and needs. Restrictions would be limited to our Asset Management service. We do not manage assets through our other services.

Participation in Wrap Fee Programs

We do not offer wrap fee programs.

Regulatory Assets Under Management

As of December 31, 2024, we manage $15,094,724 in assets on a discretionary basis and $1,772,153 in assets on a non-discretionary basis.

Item 5 – Fees and Compensation

Asset Management Fees:

For accounts managed directly by West Coast, we charge the following annual fees:

Minimum Assets	Maximum Assets	Advisory Fee Rate
$.01	to $100,000.00:	1.95% per year
$100,000.01	to $500,000.00:	1.75% per year
$500,000.01	to $1,000,000.00:	1.50% per year
$1,000,000.01	to MAX:	1.25% per year

These fees are negotiable. Annualized fees are billed on a pro-rata basis monthly in arrears based on the value of the account(s) on the last day of the month.

If third-party firms are used to manage accounts, the maximum annual fee third-party money firms charge ranges from 0.25% to 0.75%, for our asset management service. Asset management fees will not exceed 2.00%. The specific manner in which fees are charged by West Coast is established in the client's written agreement.

It is important that clients understand their overall fee and how much is paid to the third-party firm and how much is paid to West Coast. For example, if the client's total fee is 1.5%, and the third-party firm receives .5%, that means West Coast collects 1.5%, transmits .5% to the third-party firm, and retains 1% for West Coast's services. Another client may pay the same 1.5% fee, but the third-party firm receives .35% and West Coast would retain 1.15%. This presents a conflict of interest as West Coast may have an incentive to recommend one third-party firm over another. Clients are encouraged to ask questions regarding their fees, conflicts of interest, investment options, and services provided by each party being paid.

Fees are generally not negotiable and will be deducted from the client's managed account. Fees may be lower than the noted percentages at each asset class based on the exact amount of the investment and investment type where applicable.

The following separate written disclosures will be provided to you: a copy of the third-party firm's Form ADV Part 2, all relevant Brochures, a Solicitation Disclosure Statement detailing the exact fees we are paid and a copy of the third-party firm's privacy policy.

Financial Planning Service Fees:

West Coast Capital Management charges fees for financial planning services. Fixed fees refer to written financial plans and consulting agreements. Fees for financial plans range from $250 to $2,500, depending on the complexity of a client's financial situation. Half of the fee is due up front, the rest upon completion of the plan. If a client cancels, any prepaid fees will be refunded on a pro-rata basis monthly in arrears. The negotiable hourly fee is $250 and is paid after the consultations. Plans or consultations are typically completed within six (6) months of the client signing a contract with us, assuming that all the information and documents we request from the client are provided to us promptly. Implementation of the recommendations will be at the discretion of the client.

West Coast Capital Management charges fees for standalone consulting services in the amount of $200 per hour. These fees shall be charged quarterly in arrears based on the amount of consulting completed within the previous quarter. We reserve the right to waive this fee for clients engaging us for other services in addition to consulting.

Other Types of Fees & Expenses

Clients may pay the following separately incurred expenses: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses).

Although Schwab does not have any trading fees, there may occasionally be a position that will charge a small fee, however we do our best to avoid those positions.

For third-party firms that West Coast may use to manage portfolios other than Schwab, all transaction and custodial fees will be disclosed by the firm that trades are executed through.

Termination & Refunds

For assets managed directly by West Coast, we charge our advisory fees monthly in arrears. In the case of financial planning fees collected in advance, in the event that you wish to terminate our services, we will refund any unearned portion of our financial planning fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to process a pro-rata refund of unearned planning fees.

Such charges, fees and commissions are exclusive of and in addition to the third-party firm's fee and West Coast's fee, and West Coast shall not receive any portion of these commissions, fees, and costs.

Commissionable Securities Sales

We do not sell securities for a commission in our advisory accounts.

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

West Coast Capital Management or any of the third-party firms used does not charge any performance-based fees. Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Clients

West Coast Capital Management, LLC provides portfolio management services to individuals and high net worth individuals. West Coast generally requires a minimum account of $100,000 to open a portfolio. This minimum is negotiable and shall be waived in West Coast Capital Management, LLC's discretion.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

West Coast Capital Management provides advisory services for portfolios ranging from conservative to aggressive, designed to help meet the varying needs of investors. The Adviser selects the strategy combination suited to their individual needs after clients have defined their objectives, risk tolerance and time horizons. Portfolio holdings are generally derived through methods associated with quantitative analysis.

West Coast utilizes a combination of three basic investment methodologies; which include Strategic, Dynamic and Tactical. A portfolio may include one or all three of these strategies depending upon each portfolio design.

A Strategic strategy can be defined as being fully invested in the market at all times either through the use of Index ETF's or active strategies that which will attempt to outperform or capture the returns of the asset class it is designed to match.

It is incorporating the principles of Modern Portfolio Theory, which was developed by Nobel Prize winner Harry Markowitz in 1952, which states that 90% of a portfolios return will depend upon properly diversifying across many asset classes as opposed to individual stock selection. By allocating a portfolio properly an investor can increase their returns and reduce their overall risk.

Modern Portfolio Theory: ("MPT") suggests that investors can limit the volatility in their portfolio, while improving its performance, by spreading the risk among different types of securities that do not always behave the same way. It is a principle of investing that higher potential returns carry higher risk, and conversely, for lower risk, investors must accept lower expected returns. According to MPT, a portfolio (a combination of individual investments) exhibits risk and return characteristics based on its composition and the way those components correlate with each other. For each level of risk, there is an "optimal" asset allocation that is designed to produce the best balance of risk versus return. An optimal portfolio will provide neither the highest returns, nor the lowest risk of all possible portfolio combinations—it will attempt to balance the lowest risk for a given level of return and the greatest return for an acceptable level of risk.

A Dynamic Strategy maintains the ability to revert to a defensive position during certain market environments (including but not limited to government bond funds). Typically, a dynamic strategy will be fully invested at all times and vary the investments within the strategy based on the selected market indicators of the individual strategy. The performance of these strategies may not correlate with a rising stock market as well as a declining market. The objective of these programs is not necessarily to outperform the market each year, but to post consistent returns through both bull and bear markets. There is no assurance that objectives will be realized.

Dynamic strategies can underperform market averages in choppy volatile markets. Often a dynamic strategy will maintain higher levels of equity positions in bullish markets, and move into more defensive positions such as bonds, commodities and cash in bearish markets.

A Tactical Strategy seeks to actively rebalance client assets held in various categories in order to take advantage of moves in the market and/or market sectors. Tactical strategies can be short term or long term in nature and will generally move in or out of market positions, often times moving into cash or short-term government securities. There may be periods of time when a tactical strategy will remain in cash positions for extended periods of time if the strategy indicators dictate. Some of these strategies maintain the ability to invest in aggressive investment vehicles including sector, inverse and leveraged funds.

The performance of these strategies may not correlate with a rising stock market and may be volatile. The objective of these programs in not necessarily to outperform the market each year, but to post consistent returns through both bull and bear markets. There is no assurance that objectives will be realized. Described below are some particular risks associated with some types of investments.

Risk is inseparable from return. Every investment involves some degree of risk, and both the degree of risk and type of risk varies depending on the investment.

For example, the risk of loss to principal can be very close to zero in the case of a US Treasury security, or very high for something such as a concentrated exposure to one specific foreign security. On the other hand, purchasing power risk for a US Treasury security may be higher than the purchasing power risk of a higher-yield corporate bond or an equity. An understanding of risk in different forms can help clients to understand the opportunities, trade-offs and costs involved with different investment approaches. The principal risk of any investment is that despite any comprehensive analysis, the security or instrument will not perform as expected. This can be due to, among other things:

Market Risk: the success of the clients' portfolio activities will be affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, commodity prices, economic uncertainty, changes in laws, trade barriers, currency fluctuations and controls, and national and international political circumstances. These factors may affect the level of volatility of securities prices and the liquidity of investments in client portfolios. Such volatility could impair profitability or result in losses.

Equity Risk: investments in equity securities generally involve a high degree of risk. Prices are volatile and market movements are difficult to predict. These price movements may result from factors affecting individual companies or industries. Price changes may be temporary or last for extended periods. In addition to, or in spite of, the impact of movements in the overall stock market, the value of investments may decline if the particular investments within the portfolio do not perform well in the market. Prices of growth stocks may be more sensitive to changes in current or expected earnings than prices of other stocks. Prices of stocks may fall or fail to appreciate regardless of movements in securities markets. A higher turnover rate, or increased trading may result in higher transactions costs and higher taxes in taxable accounts and may also affect the strategies' overall performance.

Management Risk: the strategies utilized by West Coast may not work in some market conditions; management risk could also influence mutual fund and ETF portfolio management teams.

Fixed Income Risks: investments in fixed income securities represent numerous risks such as credit, interest rate, reinvestment, and prepayment risk, all of which affect their price/value. These risks represent the potential for a large amount of price volatility. In general, securities with longer maturities are more sensitive to price changes. Additionally, the prices of high-yield, fixed income securities fluctuate more than high-quality debt issues. Prices are especially sensitive to developments affecting the company's business and to changes in the ratings assigned by rating agencies. Prices are often closely linked with the company's stock prices.

High-yield securities can experience sudden and sharp price swings due to changes in economic conditions, stock market activity, large sales by major investors, default, or other factors. In the event of a default, the investment may suffer a partial or total loss.

Increased Regulations: events during the past several years and adverse financial results have focused attention upon the necessity to maintain adequate risk controls and compliance procedures. These events have led to increased governmental and self-regulatory authority scrutiny of the financial industry. Various national governments have also expressed concern regarding disruptive effects of speculative trading and the need to regulate the markets in general. Any regulations that restrict the ability to employ, or broker-dealers and counterparties to extend credit or restrict credit or restrict trading activities could adversely impact profit potential.

Market Liquidity Risks: the value of securities held in client accounts that are traded on exchanges and the risks associated with holding these positions vary in response to events that affect asset markets in general. Market disruptions such as those that occurred in 1987, in September 2001, and more recently the "Flash Crash" in May 2010 (the biggest one-day point decline 998.5 points, on an intraday basis in Dow Jones Industrial average history) could lead to violent price swings in securities held within client portfolios and could result in substantial losses.

Small Capitalization Companies: a portion of assets may be invested in smaller and less established companies. Both debt and equity securities of such issuers tend to be more volatile than larger, more established companies. Such volatility could adversely impact client portfolios.

Large Company Risk: large cap stocks can perform differently from other segments of the equity market or from the equity markets as a whole. Large capitalization companies may be less flexible in evolving markets or unable to implement changes as quickly as smaller capitalization companies.

Short Sales, Leverage and Derivatives: short sales, leverage and derivatives all represent substantial risks given their inherent heightened risk of loss. Leverage and derivatives imply borrowing capital. When such borrowing is deployed, losses can escalate quickly should investments suffer even small losses. Short sales involve a finite opportunity for appreciation, but a theoretically unlimited risk of loss. Short positions can also be subject to a "short squeeze" that could lead to accelerating losses for those shorting that particular security.

Price and Interest Rate Risk: when interest rates change, the price of a bond is likely to adjust up or down so that its yield, based on the new price, is in line with the new level of interest rates. Interest rate risk is probably the most significant risk facing clients in fixed income securities because it affects all bonds similarly.

Short Sales Risk: if the value of a security sold short increases prior to the scheduled delivery date, the account must pay more for the security than it has received from the purchaser in the short sale.

Options and Futures Risk: the risk that the counterparty that wrote the option will be unable or unwilling to perform its obligations under the option contract, or the options may become illiquid and difficult to close. Options are a derivative of stocks. An option derives its value from the price of the underlying stock.

Buffer ETFs: A type of structured product investment seeks to provide investors with the upside of the underlying index, market benchmark or assets returns (generally up to a capped percentage stated in the ETFs prospectus and prospectus supplement) while also providing downside protection on the first predetermined percentage of losses. Similar to other ETFs, a buffer ETF will be designed to track a stated index, market benchmark, or asset. However, the buffer ETF will also use a portfolio of options and derivatives in order to achieve the stated capped return ("cap") and limitation of losses ("buffer").

Most buffer ETFs have a stated outcome or holding period (typically a 3 month or 12-month period), in order to realize the benefits of the hedge or limitation on losses. These limited outcome periods or holding periods mean that only those investors who purchase at the beginning of the outcome period (e.g., on the first date of rebalancing) and hold the ETF throughout the entire outcome period will be provided with the level of return/protection stated by the prospectus. Investors who invest in these ETFs at any time after the beginning of the outcome or holding period or who liquidate their investments in these ETFs before the end of the holding or outcome period, will receive different caps and buffers on gains and losses than those stated in the ETF prospectus or prospectus supplement. Fund sponsors often post the anticipated cap on returns, buffers, and days remaining in the outcome period on the funds' websites. The updated caps, buffers, and days remaining should be considered and analyzed by an investor before investing in the buffer ETF at any time other than the beginning of the outcome period and should further be reviewed prior to liquidating any investment in such ETFs prior to the conclusion of the applicable holding or outcome period. At the end of an outcome period, the buffer ETF will roll into a new set of option contracts with the same buffer level and term length, but a new upside cap. This upside cap may be higher or lower than the preceding period and will depend on market conditions at the time. Additionally, the expenses associated with the new options contracts may impact the expenses of the ETF, which could impact returns to investors who hold these ETFs through multiple outcome periods.

Investors should understand that buffer ETFs are complex products with complicated and layered strategies. There are unique risks and considerations that investors must understand and accept before purchasing a buffer ETF. Investors should consider the following implications before purchasing a buffer ETF:

1. Exposure to the index is likely limited to price returns. Dividends and income are not included.
2. Downside protection is not eliminated and is only "buffered". Accordingly, if a given buffer ETF has a stated buffer of 10% and the underlying reference index falls 25% during the outcome period, that investor will experience a roughly 15% loss. This loss will be further increased once

management fees are subtracted from the portfolio. However, in 100% buffered ETFs, the principal of your investment is 100% protected, excluding management fees, as long as the product is bought at the beginning, and sold only at the end of the buffer period.

3. The buffer ETFs upside return is capped. Investors will not be compensated if the underlying reference index experiences a higher return that the stated cap. This cap is established to offset the costs of purchasing options to create the downside buffer, therefore the cap and buffer are inversely related. Thus, if investors require more downside protection, the trade-off is a lower upside cap (meaning a lower upside return). Conversely, if an investor requires a higher upside return it will result in less downside protection.
4. Due to the strategies employed these funds will generally exhibit a greater potential for loss than the potential for gain. In other words, by capping the upside, investors miss out on gains that exceed the upside cap, but they still participate in all downside losses beyond the stated buffer.
5. Because these buffer ETFs trade in options that are volatile in price, investors who invest in these ETFs beyond the initial holding or outcome period may experience losses due to the price fluctuations in the trading of options contracts at the start of the new holding period. It is therefore not recommended to hold these investments beyond the stated outcome or holding period.

Investors should also be aware that in addition to these risks unique to buffer ETFs, these products also face the same general risks associated with any ETF product. Please see the "ETF Risks, including Net Asset Valuations and Tracking Error" paragraph in this section above for more information regarding risks associated with ETFs.

Tax Risk: West Coast Capital Management in some cases may not manage client accounts with tax consequences in mind; some strategies, including transactions in options and futures contracts, can be subject to special tax rules, which may have adverse tax consequences for the account holder.

Non-US Investments: Client funds may be invested in securities (e.g., debt, equity, currencies, derivatives, etc.) of issuers domiciled outside the Unites States. Such investments expose a portfolio to a number of risks that may not exist in the domestic market alone. Such risks include, among other things, trade balances and imbalances and related economic policies, currency exchange rate fluctuations, imposition of exchange control regulation, withholding taxes, limitations on the removal of funds or other assets, possible nationalization of assets or industries, political difficulties, and political instability in foreign nations.

Potential Concentration: client portfolios may have highly concentrated positions in issuers engaged in one or a few industries. This increases the risk of loss relative to the market as a whole.

Item 9 – Disciplinary Information

Please see information disclosed in Item 19.

Item 10 – Other Financial Industry Activities and Affiliations

West Coast is not affiliated with any broker-dealers and does not receive brokerage compensation.

Gregory Brown is Managing Member of West Coast Financial Services, LLC and is also licensed and registered as an insurance agent to sell life, health, long-term care, disability and annuity insurance products for West Coast Financial Services, LLC. Therefore, he will be able to provide insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. Clients are not obligated to use West Coast Financial Services, LLC for insurance products services. A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the compensation they may earn. Gregory Brown and the firm take steps to address this potential conflict of interest, acting at all times in the best interests of our clients and are bound by our firm's Code of Ethics. Please refer to Item 11 below for additional information.

Other employees of West Coast Financial Services, LLC are also licensed insurance agents. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. West Coast Capital Management, LLC always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients always have the right to decide whether or not to utilize the services of any representative of West Coast Capital Management, LLC in such individual's outside capacities.

Representatives of West Coast may refer clients with trust creation needs to an outside trust attorney. In order to facilitate this referral, clients will be required to waive our privacy policy to the extent sharing is required with the trust attorney for this service. West Coast will receive a discounted cost for the client's services from the trust attorney for such clients. Clients should be aware that this may create a conflict of interest, as representatives will be incentivized to recommend this particular trust attorney. Clients are not required to utilize the trust attorney recommended by West Coast and West Coast does not guarantee that this attorney is in the best interest of the client. Clients should conduct their own due diligence regarding service providers.

Our firm's fees are not higher than they would have been had our client obtained services directly from the third-party firms or money managers. Prior to referring clients to third-party firms, we will ensure that third-party firms are licensed or notice filed with the respective authorities. A potential conflict of interest in utilizing third-party firms may be an incentive to us in selecting a particular advisor over another in the form of fees or services. In order to minimize this conflict our firm will make our selections in the best interest of our clients.

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

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which our firm or a related person has a material financial interest. Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day. If related persons' accounts are included in a block trade, our related persons accounts will be traded in the same manner every time.

Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics.

Item 12 – Brokerage Practices

In recommending brokerage to clients, we selected a direct relationship with Schwab because they have zero trading costs and are a very reputable firm within the investment advisory industry.

Through our recommendations of third-party firms, the custodial services of Charles Schwab may be made available to clients. Charles Schwab (hereinafter "Custodians") is a qualified custodian and offers custody of securities, trade execution, clearance, and settlement of transaction services.

West Coast Capital Management is independently owned and operated and is not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as a custodian, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

Products and services available to the Firm from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. Schwab provides West Coast Capital Management and our clients with access to institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts while others help us manage and grow our business. Schwab's support services described below are generally available on an unsolicited basis (i.e., we do not have to request them) and at no charge to us. Here is a more detailed description of Schwab's support services:

Services that Benefit Clients Directly

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit each client.

Services that May Not Directly Benefit Clients

Schwab also makes available to us other products and services that benefit us but may not directly benefit a specific client. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as trade confirmations and account statements);
- Facilitates trade execution and allocate aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients' accounts; and
- Assists with back-office functions, recordkeeping and client reporting.

Services that Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include (among others) the following:

- Educational conferences and events
- Technology, compliance, legal, and business consulting
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants and insurance providers

Schwab will provide some of these services itself or will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third-party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of the services described above from Schwab benefits us because we do not have to produce or purchase them. They are not contingent upon West Coast Capital Management committing any specific amount of business to Schwab in trading commissions or assets in custody. The fact that we receive these benefits from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively 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 taken in the aggregate our recommendation of Schwab as a custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality and price of Schwab's services, and not Schwab's services that benefit only us.

Brokerage for Client Referrals

West Coast does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

Directed Brokerage

West Coast does not allow client directed brokerage.

Order Aggregation

West Coast may, at times, aggregate sale and purchase orders of securities ("block trading") for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. West Coast may aggregate or "bunch" transactions for a client's account with those of other clients in an effort to obtain the best execution under the circumstances.

Item 13 – Review of Accounts

Gregory Brown, Chief Compliance Officer, will review West Coast's accounts on at least an annual basis for Asset Management and Third-Party Money Management clients. For accounts managed by third-party firms, accounts will be monitored for performance and investment styles of the third-party money firms to ensure that they are acting in accordance with the client's investment goals and may occasionally make recommendations to adjust the positions within the portfolio.

Our associates contact the clients from time to time, as agreed to with the client, in order to review their financial situation and objectives, if applicable we will also communicate information to third-party firms. The client will be expected to notify us of any changes in his/her financial situation, investment objectives, or account restrictions that could affect their account.

If applicable to third-party firms, clients should refer to the third-party independent registered investment advisor's Firm Brochure (or other disclosure document used in lieu of the brochure) for information regarding the nature and frequency of reports provided by that independent registered investment advisor.

Item 14 – Client Referrals and Other Compensation

Other Compensation: Schwab provides West Coast with access to services, which are not available to retail investors. These services generally are available to independent investment advisors on an unsolicited basis at no charge to them.

Many of the products and services assist West Coast in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitation of trade execution, research, pricing information and other market data, facilitation of payment of West Coast fees from its clients' accounts via the Independent Money Managers, and assist with back-office functions, recordkeeping, and client reporting.

Many of these services generally may be used to service all or a substantial number of West Coast accounts. West Coast does not enter into any commitments within exchange for any services or products.

West Coast has an agreement with SmartAsset Advisors, LLC (“SmartAsset”), an investment adviser registered with the U.S. Securities & Exchange Commission, whereby SmartAsset will receive compensation from West Coast for providing matching information regarding prospective clients to West Coast. SmartAsset is not otherwise affiliated with West Coast. SmartAsset will connect West Coast with potential client leads. Upon matching a prospective client with West Coast, the name and contact information of the prospective client will be shared with West Coast, along with other matching investment advisors, in exchange for a one-time “lead fee” paid to SmartAsset. The fee paid to SmartAsset for each matched lead will be based on the match-reported investible assets.

These fees will be paid to SmartAsset by West Coast out of normal business expense budget, no additional fees will be incurred by clients matched with West Coast by SmartAsset. This arrangement incentivizes SmartAsset to recommend West Coast, thereby resulting in a material conflict of interest for SmartAsset. However, this conflict of interest is mitigated by the facts that prospective client will likely be approached by multiple matching investment advisers to choose from, there is no additional cost to the prospective client upon engaging the investment adviser of their choice, and the fiduciary duty of West Coast to act in the client’s best interest.

Item 15 – Custody

West Coast Capital Management, LLC does not maintain custody of client funds or securities. All funds are held by the custodial firm that is selected to manage client funds. Clients should receive quarterly statements from the qualified custodian that holds and maintains client’s investment assets. West Coast urges you to carefully review such statements. State Securities Bureaus, or their equivalent, generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser’s instruction to the custodian is deemed to have custody of client funds and securities. As such, we have adopted the following safeguarding procedures:

(1) Our clients must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of our firm;

(2) Clients will receive quarterly account statements, should it be required by the jurisdiction of which they reside, as well as the value of your assets upon which our fee was based, and the specific manner in which our fee was calculated;

(3) Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

Item 16 – Investment Discretion

West Coast Capital Management, LLC receives discretionary authority from the client at the outset of an advisory relationship to select the portfolios and portfolio managers for client accounts. Such discretion is to be exercised in a manner consistent with the stated investment objectives for the client account.

West Coast Capital Management, LLC does not buy or sell securities, but either will select, or instead uses third-party firms, in selecting securities and determine the amounts to be bought and sold in client accounts. If third-party firms are used, they will observe the investment policies, limitations, and restrictions of the clients for which it advises. For registered investment companies, third-party firms' authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made. Clients must provide investment guidelines and restrictions to West Coast Capital Management, LLC in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, West Coast Capital Management, LLC does not have any authority to and does not vote proxies on behalf of advisory clients, Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. West Coast may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Our firm does not require nor is prepayment solicited for more than $500 in fees per client, 6 months or more in advance. Therefore, our firm has not included a balance sheet for our most recent fiscal year.

Our firm has never been the subject of a bankruptcy proceeding

Item 19 – Requirements for State-Registered Advisers

Gregory Brown

Born in 1961

Educational Background:

1983: University of Washington: BA in Economics

Business Background:

2006 – Present West Coast Capital Management, LLC; Managing Member, Chief Compliance Officer & Investment Adviser Representative

2006 – Present West Coast Financial Services, LLC; President & Insurance Agent

Exams, Licenses & Other Professional Designations:

Series 7: 2000

Series 63 & Series 6: 1995

Series 65: 2006

License#: 0G66830

On June 8, 2004, the Arizona Corporate Commission issued an order revoking Gregory Brown's securities license after determining equipment leasing programs that were sold to investors from May 2000 to April 2001 were considered unregistered securities. Mr. Brown was ordered to pay an administrative penalty of $7500 and restitution of $230,000 which was paid by Intersecurities, Mr. Brown's former employing broker-dealer.

In addition, related to the sales of the equipment leasing programs, Mr. Brown was involved in three arbitration cases alleging violations of state and federal securities laws. In each case, Intersecurities entered into settlement agreements with the complainants. Additional information about Mr. Brown is available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching CRD# 2233684.

Andrew Brown

Born in 1988

Education Background:

2009: Conservatory of Recording Arts & Sciences

Business Background:

12/2020 – Present MedicarePRO, CEO

01/2012 – Present West Coast Capital Management, LLC, Investment Adviser Representative

03/2010 – Present Brown Legacy & Associates; Owner

01/2003 –06/2014 Mastermind Productions; Owner

Exams, Licenses & Other Professional Designations:

Series 65: 2011

Andreas Hoefer

Born 1960

Education Background:

1993: Masters International Management MBA, Thunderbird School of Global Management

1984: Bachelor of Science Natural Sciences, University of Washington

Business Background:

07/2021 – Present West Coast Capital Management, LLC, Investment Adviser Representative

01/2020 – Present: TrueNorth Retirement Planning, Owner

06/2007 - 08/2019: Dexmet Corporation, CFO

Exams, Licenses & Other Professional Designations:

Series 65: 2020

Please see Item 10 of this Firm Brochure for any other business in which we are actively engaged Gregory Brown, Andrew Brown, and Andreas Hoefer individually spend approximately 100 hours per month all of which are during trading hours on the insurance business disclosed in Item 10 of this Firm Brochure. We do not charge performance-based fees. Our firm and management persons have not been involved in any arbitration awards, found liable in any civil, self-regulatory organization or administrative proceedings or have any relationships with issuers or securities apart from what is disclosed above.

Our firm does not have compensation arrangements connected with advisory services which are in addition to our advisory fees. Our management persons and representatives do not engage in other financial industry activities or affiliations. As a fiduciary, we always put our Client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 11 of this Brochure. You may obtain a copy of our Code of Ethics by contacting Gregory Brown, Chief Compliance Officer at (480) 460-3790.