



WHITE OAK
FINANCIAL MANAGEMENT INC
REGISTERED INVESTMENT ADVISOR

FIRM BROCHURE PART 2 OF FORM ADV

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This brochure provides information about the qualifications and business practices of WHITE OAK FINANCIAL MANAGEMENT, INC. If you have any questions about the contents of this brochure, please contact us at 828-274-7844 or by email at info@wofm.us. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority. Additional information about WHITE OAK FINANCIAL MANAGEMENT, INC. is available on the SEC's website at www.adviserinfo.sec.gov.

"Registered Investment Advisor" does not imply any certain level of skill or training.

This annual update does not reflect any material changes since the March 31, 2021, brochure which did reflect material changes. Please see below.

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when changes occur since the previous release of the Firm Brochure, and any material changes will be outlined below.

Material Changes to the 2021 Brochure

Luke Gerolimos joined White Oak as an Investment Advisor Representative in December 2020.

Full Brochure Available

If you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at (828) 274-7844 or email at info@wofm.us.

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Advisory Business

Firm Description

WHITE OAK FINANCIAL MANAGEMENT, INC. (the “Advisor” or “White Oak”), was founded in 2003.

WHITE OAK provides personalized confidential financial strategies and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation for understanding of prospects’ or Clients’ values, determination of financial goals and objectives, and understanding of their current financial situation. Advice may include non-investment related matters such as identification of financial concerns, recommendations for cash flow management, tax guidance, insurance review, education funding, retirement planning, and estate guidance.

WHITE OAK is a fee-based investment management firm. While the majority of our Clients pay an annualized asset-based fee under the WHITE OAK Asset Management Wrap Program (the “Program”), the Advisor may also sell annuities, insurance, limited partnerships, or other commissioned products and receive a commission for these sales. WHITE OAK is not affiliated with entities that sell financial products or securities. No finder’s fees are accepted.

Investment advice is an integral part of developing a financial strategy. In addition to providing investment management, WHITE OAK advises Clients regarding cash flow, budgeting, college planning, and retirement planning. Tax and estate planning guidance may also be provided.

WHITE OAK does not act as a custodian of Client assets. The Client always maintains asset control. WHITE OAK places trades for Clients using full discretion granted under the terms of Custodian’s Brokerage Account Application and under WHITE OAK’S Advisory Service Agreement.

A written evaluation of each Client's initial situation is maintained and can be provided to the Client upon request. Periodic reviews may also be communicated to provide reminders of the specific courses of action that need to be taken. Frequent account reviews occur but are not necessarily communicated to the Client unless immediate changes are recommended.

Other professionals (such as lawyers, accountants, insurance agents, etc.) are engaged directly by the Client on an as-needed basis. In performing its services, WHITE OAK will not be required to verify any information received from the Client or from the Client's other professionals (e.g., attorney, accountant, etc.), and WHITE OAK is expressly authorized to rely on such information. WHITE OAK may recommend the services of itself and/or other professionals to implement its recommendations. Clients are advised that a conflict of interest exists if WHITE OAK recommends its own services. The

Client is under no obligation to act upon any of the recommendations made by WHITE OAK under a financial strategy development or consulting engagement and/or to engage the services of any such recommended professional, including WHITE OAK. The Client retains absolute discretion over all such implementation decisions and is free to accept or reject any of the Advisor's recommendations. Each Client is advised that it remains his responsibility to promptly notify WHITE OAK of any changes in his financial situation or investment objectives for the purpose of reviewing, evaluating, or revising the Advisor's previous recommendations and/or services.

The initial meeting, which may be by telephone (828) 274-7844 or video conference, is free of charge and is considered an exploratory interview to determine the extent to which financial strategizing and investment management may be beneficial to the prospect.

Principal Owners

Laura McCue is a 50% stockholder. Priestley Ford is a 50% stockholder.

Types of Advisory Services

WHITE OAK provides investment supervisory services (also known as asset advisory services); manages investment assets not involving investment supervisory services; furnishes investment advice through consultations; and may provide charts, graphs, formulas, or other devices, which Clients may use to evaluate securities.

On more than an occasional basis, WHITE OAK furnishes advice to Clients on matters not involving securities, such as financial strategy matters, taxation issues, estate planning issues, and trust services.

As of March 30, 2022, WHITE OAK has approximately \$106,360,000 in assets under management for approximately 375 Clients of our Asset Advisory Program. Approximately \$106,360,000 are regulatory assets under management managed on a discretionary basis through our Asset Advisory Service. Approximately \$5,000,000 are assets under advisement managed on a non-discretionary basis where either a) WHITE OAK is the Investment Advisor for a qualified retirement plan, b) WHITE OAK provides investment advice directly to participants of a retirement plan where WHITE OAK is NOT the plan investment advisor, or c) WHITE OAK provides investment advice to owners of variable and fixed annuities and/or insurance policies.

Client Relationships

The goals and objectives for each discretionary Advisory Service Client are documented in our Client relationship management system and in the Client's physical file. WHITE OAK also uses an Investment Policy Statement that reflects the investment philosophy and management style of our firm. The advisors review this policy with prospects before opening accounts. Clients

may impose restrictions on investing in certain securities or types of securities on Schedule B of WHITE OAK's Advisory Service Agreement.

Types of Agreements

Prior to engaging WHITE OAK to provide asset advisory services, investment management services, or consulting services, the Client will generally be required to enter into a written agreement with WHITE OAK setting forth the terms and conditions of the engagement and describing the scope of the services to be provided. Agreements may not be assigned without Client consent.

The following agreements define the typical Client relationships.

Advisory Service Agreement

Most Clients choose to have WHITE OAK manage their assets in order to obtain ongoing in-depth advice and life planning. All aspects of the Client's financial affairs are reviewed. Agreed-upon realistic and measurable goals are set, and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the Client in writing prior to the start of the relationship. WHITE OAK is the sponsor of the WHITE OAK Asset Management Program, a wrap fee program. A complete description of the Program's terms and conditions (including fees) are contained in the Program's Wrap Brochure.

An Advisory Service Agreement may include: cash flow analysis and budgeting; insurance review; investment management (including performance reporting); education planning; retirement planning; estate planning guidance; and tax planning guidance, as well as guidance in the implementation of recommendations within each area.

WHITE OAK will charge the Client an annual fee based on a percentage of the market value of the assets being managed by WHITE OAK. The annual fee will be prorated and charged quarterly, in advance, based on the market value of the assets on the last day of the previous quarter. The Advisory Service Agreement fee is applied according to the following schedule:

Over \$5,000,000	0.7%
\$3,000,001 - \$5,000,000	1.0%
\$1,000,001 - \$3,000,000	1.2%
\$750,001 - \$1,000,000	1.5%
\$500,001 - \$750,000	1.7%

\$0.00 - \$500,000

2.0%

The fee will be calculated on a pro rata basis with a net cash flow adjustment. This means that if a deposit is made to the account in an amount more than 5% of the account balance on the last day of the billing quarter, and after the fee has been calculated and billed, then the following quarter, the fee will be adjusted to include the days since the deposit was made in the previous quarter. Current Client relationships may exist where the fees are higher or lower than the fee schedule above. The fee is negotiable.

Investment Management Agreement

An Investment Management Agreement may be executed when development of a comprehensive financial strategy is not provided as part of the relationship and the Advisor does NOT exercise discretion on the assets. The Client will provide quarterly statements to WHITE OAK for billing and portfolio review purposes. The annual fee, based on account values, will be prorated and billed quarterly, in advance, based on the market value of the assets on the last day of the previous quarter as provided by the Client. There is no net cash flow adjustment in this calculation. The fee is negotiable.

Retainer Agreement

In some circumstances, a Retainer Agreement may be executed in lieu of an Advisory Service Agreement or Investment Management Agreement when it is more appropriate to work on a fixed-fee basis. If the Client later engages WHITE OAK under an Advisory Services Agreement or an Investment Management Agreement, the Advisor may waive all or a portion of its fees under this agreement. The fee for a Retainer Agreement is normally \$300 and is negotiable.

Asset Management

Assets are invested primarily in mutual funds, exchange-traded funds, closed-end funds, individual stocks and bonds, real estate investment trusts, and master limited partnerships. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. WHITE OAK does not receive any portion of these commissions, management fees, or trading costs. WHITE OAK does not directly receive any compensation, in any form, from fund companies.

Stocks and bonds may be purchased or sold through a brokerage account when appropriate. The Securities & Exchange Commission may charge a nominal transaction fee for stock, bond, and some mutual fund trades, which are paid by the Client.

Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities,

investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, options contracts, futures contracts, and interests in partnerships. However, WHITE OAK intends to primarily give its advice regarding mutual funds, exchange-traded funds, non-traded REIT's, and individual debt and equity securities.

Initial public offerings (IPO's) are not available through WHITE OAK.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying WHITE OAK in writing and paying the rate for the time spent on the investment advisory engagement prior to notification of termination. WHITE OAK may terminate any of the aforementioned agreements at any time by notifying the Client in writing. If the Client made an advance payment, WHITE OAK will refund any unearned portion of the advance payment within thirty (30) days. If the termination occurs within five (5) business days of entering into an agreement for services, the Client will be entitled to a full refund.

Fees and Compensation

Description

WHITE OAK bases its fees on a percentage of assets under management. Other compensation may also include fixed fees and commissions depending on the chosen Client agreement. WHITE OAK, in its sole discretion, may waive its fee and/or charge a lesser fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Fee Billing

Fees under the Advisory Service Agreement and Investment Management Agreement are billed quarterly, in *advance*, meaning that we invoice the Client *after* the three-month billing period has *begun*. For the initial quarter of the Advisory Services management, the first quarter's fees will be calculated on a pro rata basis, meaning that the fee will be calculated from the first day the account is funded and then in advance for the next quarter. Payment in full is expected upon invoice presentation. Fees are usually deducted from one or more designated Client accounts to facilitate billing. Clients must consent in advance to direct debiting of their investment accounts.

Retainer Agreement fees are paid by invoice presented to Client at the time financial services are rendered and are payable upon presentation of invoice. WHITE OAK, in its sole discretion, may waive its fee and/or charge a lesser fee.

Other Fees

Custodians usually charge transaction fees on purchases or sales of certain mutual funds, exchange-traded funds, and other individual debt and equity transactions. WHITE OAK's advisory fee does not include any mutual fund commissions, transaction fees, or other related costs, which will be borne by WHITE OAK. WHITE OAK will not receive any portion of these commissions, fees and costs. A conflict of interest may exist where WHITE OAK pays the Client transaction costs incurred while managing Client accounts, in that trading costs reduce total compensation to WHITE OAK or that a platform allows for trading costs to be reduced or eliminated for some securities.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services annually.

These fees are in addition to the fees paid by you to WHITE OAK, and WHITE OAK does not absorb these costs and will not receive any portion of these management fees.

Past-Due Accounts and Termination of Agreement

WHITE OAK reserves the right to stop work on any account that is more than 60 days overdue. In addition, WHITE OAK reserves the right to terminate any financial strategizing engagement where a Client has willfully concealed or has refused to provide pertinent information about financial situations when, in WHITE OAK's judgment, that information is necessary and appropriate in providing proper financial advice. Any unused portion of fees collected in advance will be refunded within thirty (30) days.

Performance-Based Fees

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

WHITE OAK does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend or use an investment that may carry a higher degree of risk to the Client.

Types of Clients

Description

WHITE OAK generally provides investment advice to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities.

Client relationships vary in scope and length of service.

Account Minimums

WHITE OAK does not require an account minimum.

Methods of Analysis, Investment Strategies, and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

The main sources of information include financial newspapers and magazines, inspections of corporate activities, research and charting materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.

Other sources of information that WHITE OAK may use include Morningstar mutual fund information, Morningstar stock information, MSN Research Wizard, Yahoo Finance, Dorsey Wright and Associates technical charting service, and The Sherman Sheet.

Investment Strategies

The primary investment strategy used on Client accounts incorporates both strategic and tactical asset allocation. A strategic approach to asset allocation is to have exposure to multiple asset classes that may historically be non-correlated, but the tactical part of the strategy is to use the concept of relative strength to determine the weighting of each asset class. The weighting will not stay exactly the same over time; it will fluctuate depending on trends in the market. The theory behind strategic asset allocation is that by spreading exposure across several asset classes, risk may be reduced in the overall portfolio. Tactical allocation takes current market and asset trends into consideration as well. The portfolio may be periodically rebalanced to the target percentages. Portfolios may be globally diversified to help manage the risk. Neither Asset allocation nor Tactical allocation guarantees a profit or protects against loss.

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Other strategies may include long-term purchases, short-term purchases, trading, margin transactions, and stop loss orders.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **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.
- **Market Risk:** The price of a stock, bond, mutual fund or other security 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, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk 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.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment Clients.

Other Financial Industry Activities and Affiliations

Affiliations

WHITE OAK has no other financial industry activities or affiliations.

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

Code of Ethics

The employees of WHITE OAK have committed to a Code of Ethics that is available for review. The firm will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Participation or Interest in Client Transactions

WHITE OAK and its employees may buy or sell securities that are also held by Clients. Employees may not trade their own securities ahead of Client trades. Employees comply with the provisions of the WHITE OAK Compliance Manual.

Personal Trading

The Chief Compliance Officer of WHITE OAK is Laura McCue. She reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that Clients of the firm do not receive preferential treatment. Since most employee trades are small debt or equity trades, mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

WHITE OAK does not have any affiliation with product sales firms. Specific custodian recommendations are made to Clients based on their need for such services. WHITE OAK recommends custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at

reasonable commission rates. WHITE OAK will generally recommend that Clients utilize the brokerage and clearing services of National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") for Advisory Service accounts.

WHITE OAK has an arrangement through which Fidelity provides WHITE OAK (an "Advisor Client" of Fidelity) with "institutional platform services," which include brokerage, custody, and other related services. Fidelity's institutional platform services that assist WHITE OAK in managing and administering Clients' accounts include software and other technology that (i) provide access to Client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple Client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of fees from its Clients' accounts; and (v) assist with back-office functions, recordkeeping, and client reporting. WHITE OAK is independently owned and operated and is not affiliated with Fidelity.

Fidelity generally does not charge its Advisor Clients separately for custody services but is compensated by the Advisor Client or the Advisor Client's account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Fidelity or that settle into Fidelity accounts (i.e., transactions fees are charged for certain no-load mutual funds; commissions are charged for individual equity and debt securities transactions.). Fidelity provides access to many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges.

Under WHITE OAK's Advisory Service Agreement, WHITE OAK compensates Fidelity for its custodial services by paying the commissions and transactions fees to Fidelity for its clients. Other custodians may offer same or other arrangements for custody services provided to WHITE OAK.

WHITE OAK may only implement its investment management recommendations after the Client has arranged for and furnished the Advisor with all information and authorization regarding accounts with appropriate financial institutions. Financial institutions will include, but are not limited to, Fidelity, any other broker/dealer recommended by the Advisor or directed by the Client, trust companies, banks etc. (collectively referred to herein as the "Financial Institution(s)").

WHITE OAK does not receive any fees or commissions from any of these arrangements.

Best Execution

WHITE OAK reviews the execution of trades at each custodian each quarter. The review is documented in the WHITE OAK Compliance Manual. Trading fees charged by the custodians are also reviewed on a quarterly basis. WHITE OAK does not receive any portion of the trading fees.

Soft Dollars

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker/dealers in return for investment research products and/or services which assist WHITE OAK in its investment decision-making process. Such research generally will be used to service all of the Clients of WHITE OAK but fees paid by one Client may be used to pay for research that is not used in managing that Client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest.

Fidelity also offers other services intended to help WHITE OAK or other Advisor Clients manage and further develop their advisory practices. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third-party research, publications, access to educational conferences, roundtables and webinars, practice management resources, and access to consultants and other third-party service providers who provide a wide array of business-related services and technology, and with whom WHITE OAK may contract directly.

The selection of Fidelity Investments LLC as a custodian for Clients is not affected by this soft dollar arrangement.

Order Aggregation

Most trades are mutual funds, stocks, REITS, or exchange-traded funds where trade aggregation does not garner any Client benefit.

Review of Accounts

Periodic Reviews

The Chief Compliance Officer, Laura McCue, performs account reviews on at least a quarterly basis by the Investment Advisor Representatives.

Review Triggers

Other conditions that may trigger a review are changes in current market conditions, tax laws, new investment information, and changes in a Client's personal situation.

Regular Reports

Clients receive periodic communications from WHITE OAK on at least an annual basis and usually meet with their investment advisor in person or by phone semi-annually. Advisory Service Agreement Clients receive written quarterly statements prepared by and from the chosen custodian. They may also receive written updates that may include a portfolio performance report, a summary of current holdings in each account, and a summary of deposits, withdrawals, and fees for the review period. These reports are prepared by a chosen Performance Reporting firm and by WHITE OAK. Advisory Service Clients may also choose to have online viewing access of their accounts held at the custodian firm if the firm offers this service.

Client Referrals and Other Compensation

Incoming Referrals

WHITE OAK has been fortunate to receive many Client referrals over the years. The referrals came from current Clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The firm does not compensate referring parties for these referrals.

Referrals Out

WHITE OAK does not accept referral fees or any form of remuneration from other professionals when a prospect or Client is referred to them by the Advisor.

Other Compensation

WHITE OAK is a duly licensed insurance agency. Additionally, certain of its Investment Advisor Representatives, in their individual capacities, are licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully-disclosed basis, the purchase of certain insurance products. A conflict of interest exists to the extent that White Oak Financial Management's Investment Advisor Representatives may recommend the purchase of insurance products where WHITE OAK may receive insurance commissions or other additional compensation.

Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements and trade confirmations, at least quarterly, directly to Clients at their address of record and to 1270 Hendersonville Road, Suite 4, Asheville, NC 28803.

Performance Reports

Clients are urged to review the account statements received directly from their custodians and compare them with any performance report statements provided by WHITE OAK. Advisory Service Clients may sign up for online viewing access of their accounts if offered by the custodian.

Investment Discretion

Discretionary Authority for Trading

WHITE OAK accepts discretionary authority to manage securities accounts on behalf of Clients under the Advisory Services Agreement and as granted under the terms of Custodian's Brokerage Account Application and Agreement with Clients. WHITE OAK has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in Client accounts on Client's behalf so that we may promptly implement the investment policy. Any investment restriction or guidelines desired by the Client are noted on Schedule B of the Advisory Services Agreement.

WHITE OAK reserves the right to liquidate any transferred securities, or to decline to accept particular securities into a Client's account.

The Client approves the custodian to be used. WHITE OAK does not receive any portion of the transaction fees or commissions charged by the custodian on certain trades.

WHITE OAK does not accept discretionary authority to manage securities under the Investment Management Agreement or the Retainer Agreement and will only recommend investment allocations to the Client. Client retains all authority and responsibility to implement Advisor recommendations.

Voting Client Securities

Proxy Votes

WHITE OAK does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, WHITE OAK will provide recommendations to the Client. A conflict of interest may exist and will be disclosed to the Client.

Financial Information

Financial Condition

WHITE OAK does not have any financial impairment that will preclude the firm from meeting contractual commitments to Clients.

A balance sheet attachment is not required because WHITE OAK does not serve as a custodian for Client funds or securities, and does not require prepayment of fees of more than \$600 per Client, or six months or more in advance.

Business Continuity Plan

General

WHITE OAK has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornadoes, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, sewage line backup, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Key electronic files are backed up daily and archived offsite. Other electronic files are backed up once a week and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all Clients within five days of any disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

WHITE OAK may rely on an internal succession plan or sign a Business Continuation Agreement with another financial advisory firm to support WHITE OAK in the event of Laura McCue's serious disability or death.

Information Security Program

Information Security

WHITE OAK maintains an information security program to reduce the risk that your personal and confidential information may be breached.

Privacy Notice

WHITE OAK is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial strategy development process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

Only with your permission may we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt in or out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone (828) 274-7844, Fax (828) 274-7848, email info@wofm.us, regular mail or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques, and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, such as financial service companies, performance reporting companies, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a Client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

WHITE OAK requires that advisors in its employ have a bachelor's degree or acceptable work experience that demonstrates their aptitude for investment management or developing financial strategies.

Professional Certifications

WHITE OAK does not require that employees earn additional certifications and credentials. The firm does support and encourage both state-required and optional continuing education efforts of its employees.

Laura McCue, President/CEO, Investment Advisor Representative

Date of Birth: December 2, 1958

Educational Background: BA Elementary Education, Rollins College 1981

Business Experience: WHITE OAK FINANCIAL MANAGEMENT, INC., President /CEO/ Chief Compliance Officer, 03/2003 – Present; LINSICO/PRIVATE LEDGER, Branch Office Manager/Registered Representative, 03/2003 – 09/2007; WACHOVIA SECURITIES., Registered Representative, 12/1998 -- 03/2003.

Disciplinary Actions/Information: None

Other Business Activities: Volunteer State Director for Americans for Fair Taxation; Recording Secretary for Colonial Dames of America – Buncombe Committee; Finance Committee member for Southern Appalachian Highlands Conservancy; Investment Committee Chair for French Broad River Garden Club; Board Member for WNC Nature Center.

Additional Compensation: None

Supervision:

Laura McCue, President/CEO, supervises Laura McCue.

Laura McCue's contact information: (828) 274-7844 or info@wofm.us

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Priestley C. Ford, Vice President/COO

Date of Birth: December 15, 1960

Educational Background: BA History, Tulane University 1983

Business Experience: WHITE OAK FINANCIAL MANAGEMENT, INC., Vice-President and COO, 03/2003 – Present; ALLSTATE STAFF COUNSEL, Paralegal, 01/1999 – 12/2002.

Disciplinary Actions/Information: None

Other Business Activities: Asheville Humane Society Development Committee Member

Additional Compensation: None

Supervision:

Laura McCue, President/CEO, supervises Priestley Ford. She reviews Priestley Ford's work through frequent office interactions as well as remote interactions. She also reviews Priestley Ford's activities through our Client relationship management system.

Laura McCue's contact information: (828) 274-7844 or info@wofm.us

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Brent A. Ford, CFP, Investment Advisor Representative

Date of Birth: November 5, 1959

Educational Background:

- University of North Carolina at Chapel Hill, Master's Degree
- University of North Carolina at Chapel Hill, Bachelor's Degree
- Designations: Certified Financial Planner™ (CFP®)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries

for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Experience: WHITE OAK FINANCIAL MANAGEMENT, INC.,
Investment Advisor Representative, 09/2015 – Present; MERRIL LYNCH,
Financial Advisor, 07/2006 - 09/2015

Disciplinary Actions/Information: None

Other Business Activities: Brent has written and published a number of children’s books through an entity entitled nVizn Ideas LLC. To date, the

compensation received from these books represents less than 1% of Brent's total compensation and requires little time during market trading hours.

Additional Compensation: None

Supervision: Laura McCue, President/CEO, supervises Brent Ford. She reviews his work through frequent office interactions as well as remote interactions. She also reviews Brent Ford's activities through our Client relationship management system and through monitoring the trade blotter. Laura McCue's contact information: (828) 274-7844 or info@wofm.us

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: None

Luke Gerolimos, Investment Advisor Representative

Date of birth: December 6, 1982

Educational Background: AD Education/Special Education SUNY Albany 2003

Business Experience: WHITE OAK FINANCIAL MANAGEMENT, INC., Investment Advisor Representative 12/2020 – Present; WESTERN AND SOUTHERN FINANCIAL GROUP, Registered Representative, 01/2018 – 12/2020; AIM SERVICES, INC., President and CEO, 06/2012 – 07/2017

Disciplinary Actions/Information: None

Other Business Activities: Habilitation Tech/Employment Coach for Mountain Area Community Services, Inc. Additional Compensation: Approximately \$4000 annually

Supervision: Laura McCue, President/CEO, reviews Luke Gerolimos' work through frequent office interactions as well as remote interactions. She also reviews Luke Gerolimos' activities through our Client relationship management system and through monitoring the trade blotter. Laura McCue's contact information: (828) 274-7844 or info@wofm.us

Arbitration Claims: None

Self-Regulatory Organization or Administrative Proceeding: None

Bankruptcy Petition: Discharged 04/2015 during divorce proceedings

Rev. 03/31/2022