

WRAP Agreement Disclosures

Your firm may offer investment advice and general brokerage services for a single combined fee. You may do this through your own broker dealer, if you have one, through an agreement with a custodial broker dealer, or you may select and/or provide advice to your clientele regarding the selection of some other entity's WRAP program. In the case of the latter, you must amend your Form ADV and make certain disclosures for each WRAP program. A partial list of such disclosures includes:

- The amount of the wrap fee or a schedule of fees
- Fees and expenses likely to be incurred not included in the wrap fee
- Portion of fees paid to portfolio managers
- Description of services provided
- The relative cost and benefits of the program
- Conflicts of interest in compensation and transaction processing
- Selection and review of portfolio managers
- Definition of performance benchmarks
- Activity and performance review
- Client contact with portfolio managers
- Types of clients
- Other Disclosures

NCCI can assist you in preparing your WRAP filings, brochure, disclosures, and Form ADV amendments. Additionally, if you are using some other entity's WRAP program, we can support and facilitate your due diligence efforts through our careful review of their materials and disclosures on your behalf.