



Form ADV Part 2A
Investment Advisor Brochure

Item 1: Cover Page

Name of Registered Investment Advisor	Wilco Financial, LLC
Address	6809 Falls Ridge Lane, College Grove, TN 37046
Phone Number	(615) 857-3597
Website Address	www.wilcofin.com
E-mail Address	jgillett@wilcofin.com
Date of Brochure as Last Revised	12/13/23

This Form ADV Part 2A (Investment Advisor Brochure) gives information about the investment advisor and its business for the use of clients and prospective clients. If you have any questions about the contents of this brochure, please contact us using one of the methods listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration is mandatory for all persons meeting the definition of investment advisor and does not imply a certain level of skill or training.

Additional information about our firm is available on the SEC’s website at: www.adviserinfo.sec.gov.

Item 2: Material Changes

The purpose of this section is to discuss only material changes since the last annual update of Wilco Financial, LLC’s Investment Advisor Brochure.

The date of the last annual update: 12/13/23

Summary of Material Changes:

1. Change of website to www.wilcofin.com, from www.wilcofinancialservices.com
2. Change of email address to jgillett@wilcofin.com, from jgillett@wilcofinancialservices.com
3. AUM Increased from \$0 to \$103,540
4. Changed “fees are not negotiable” to “fees are negotiable”
5. Item 7 changed to eliminate the minimum account size and change the minimum annual fee to \$1,700 or 1.85% of assets under management, whichever is less.

Delivery:

Within 120 days of our fiscal year end we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment.

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Item 4: Advisory Business

Advisory Firm

Wilco Financial, LLC has been providing investment advisory services since 2023. Jonathan Gillett is the founder and President and has been in the financial services industry since 2001.

Advisory Services

Wilco Financial, LLC provides managed investment services under which the firm makes investment decisions informed by individual clients' risk-profiles and other client-specific information. Wilco does not take custody of client assets, but rather is given authority by clients to make and execute investment decisions in accounts held by clients on their behalf.

As of April 15, 2024, Wilco Financial, LLC has \$103,540 of assets under management on a discretionary basis, and \$0 of assets under management on a non-discretionary basis.

Services are based on the individual needs of the client. An initial interview and data gathering questionnaire is undertaken to determine the client's financial situation and investment objectives, and to give the client the opportunity to impose reasonable restrictions on the management of the account. Clients have the ability to leave standing instructions with the IA Rep to refrain from investing in particular securities or types of securities, or invest in limited amounts of securities. Quarterly the IA Rep will notify the client in writing to contact the IA Rep if there have been any changes in the client's financial situation or investment objectives, or to impose or modify account restrictions. The IA Rep will contact or attempt to contact the client annually on these matters. It is the client's responsibility to notify the IA Rep at any time there are changes. Clients may call in at any time during normal business hours to discuss directly with the IA Rep about the client's account, financial situation, or investment needs. Clients will receive from the custodian/brokerage firm timely confirmations and at least quarterly statements containing a description of all transactions and all account activity. The client will retain rights of ownership of all securities and funds in the account to the same extent as if the client held the securities and funds outside the program. In addition to custodial statements, Wilco Financial, LLC sends quarterly reports to the client.

Wilco Financial, LLC provides financial plans consistent with the individual client's financial and tax status and risk/reward objectives. Planning may be comprehensive, or segmented and will generally focus on investments, insurance, taxes, and/or estate plans.

On occasion we hold seminars. These seminars may include presentations on financial planning strategies, securities products, economics, or the state of securities markets. A fee is not charged to those in attendance.

Item 5: Fees and Compensation

Fees for financial plans vary depending on the level of complexity and detail required, but will not exceed \$2,500. Half the fee is payable upon signing the Agreement and the balance upon delivery of the written plan.

Fees for managed investments are computed at an annualized percentage rate of 0.85% of assets under management.

These fees are for advisory services only and do not include any transaction fees or commissions, which may be charged separately by the broker/dealer custodial firm. See the section heading Brokerage Practices for more information.

For managed investments, the fee will be payable quarterly in arrears. The first payment is assessed and due at the end of the first calendar quarter and will be assessed pro rata in the event the Agreement is executed at any time other than the first day of the current calendar quarter. Subsequent payments are due and will be assessed on the first day after the end of each calendar quarter based on the value of the account assets under supervision as of the close of business on the last business day of that quarter.

Payment of fees may be paid direct by the client, or client may authorize the custodian holding client funds and securities to deduct Wilco Financial, LLC's advisory fees direct from the client account in accordance with statements prepared and submitted to the custodian by Wilco Financial, LLC. The custodian will provide periodic account statements to the client. Such statements will reflect all fee withdrawals by Wilco Financial, LLC. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated. Wilco Financial, LLC will send an invoice to the client at the same time we send the statement to the custodian.

Fees are negotiable.

Wilco Financial, LLC is deemed to be a Fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, Wilco Financial, LLC is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. Wilco Financial, LLC only charges managed investment or financial planning fees for our services and does not receive any commissions, 12b-1 fees or other forms compensation.

When Wilco Financial, LLC and our IA Reps provide any rollover recommendations (e.g. from your employer's retirement plan, such as a 401(k), 457, or ERISA 403(b) account to individual retirement accounts), we are acting as fiduciaries within the meaning of Title I of the ERISA and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. If you elect to roll the assets to an IRA we will manage for you, we will charge you an advisory fee. This financial incentive creates a conflict of interest. You are under no obligation to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Due to the conflict of interest when we make rollover recommendations, we operate under rules that require us to act in your best interests and not put our interests ahead of yours. These rule's provisions require us to:

- meet a professional standard of care when making investment recommendations (i.e. give prudent advice);
- never put our financial interests ahead of yours when making recommendations (i.e. give loyal advice);
- avoid misleading statements about conflicts of interest, fees, and investments;
- follow policies and procedures designed to ensure that we give advice that is in your best interests;
- charge no more than a reasonable fee for our services; and
- give you basic information about conflicts of interest.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change

jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of a rollover. Note that an employee will typically have four options in this situation:

1. leaving the funds in your employer's (former employer's) plan;
2. moving the funds to a new employer's retirement plan;
3. cashing out and taking a taxable distribution from the plan; or
4. rolling the funds into an IRA rollover account.

Each of these options has positives and negatives. Because of that, along with the importance of understanding the differences between these types of accounts, we will provide you with a written explanation of the advantages and disadvantages of both account types and the basis for our belief that the rollover transaction we recommend is in your best interests.

As an alternative to providing you with a rollover recommendation, we may instead take an entirely educational approach in accordance with the U.S. Department of Labor's Interpretive Bulletin 96-1. Under this approach, our role will be limited only to providing you with general educational materials regarding the pros and cons of rollover transactions. We would make no recommendation to you regarding the prospective rollover of your assets and you are advised to speak with your trusted tax and legal advisors with respect to rollover decisions. As part of this educational approach, we will discuss with you general information about some or all of the following topics: the general pros and cons of rollover transactions; the benefits of retirement plan participation; the impact of pre-retirement withdrawals on retirement income; the investment options available inside your Plan Account; and high level discussion of general investment concepts (*e.g.*, risk versus return, the benefits of diversification and asset allocation, historical returns of certain asset classes, etc.). We may also provide you with questionnaires and/or interactive investment materials that may provide a means for you to independently determine your future retirement income needs and to assess the impact of different asset allocations on your retirement income. You will make the final rollover decision.

Fees are not collected for services to be performed more than six months in advance.

Advisory services similar to those offered by this advisor, may be found elsewhere at lower rates.

In addition to fees paid for advisory services with respect to clients' investments in mutual funds, clients pay additional fees on the mutual fund investment because the mutual funds also pay advisory and/or management fees to an investment advisor.

For managed investments, services will continue until either party terminates the Agreement with written notice.

If termination occurs prior to the end of a calendar quarter, the client will be invoiced for fees due on a pro-rata basis.

For financial plans, the client may terminate the Agreement at any time and a refund of the unearned fees will be made based on time and effort expended before termination. The Agreement for financial plans terminates upon delivery of the plan or services. At this time no refunds will be made.

The Advisory Agreement contains a pre-dispute arbitration clause. Client understands that the agreement to arbitrate does not constitute a waiver of the right to seek a judicial forum where such a waiver would be void under the federal securities laws. Arbitration is final and binding on the parties.

Item 6: Performance-Based Fees And Side-By-Side Management

Wilco Financial, LLC does not charge performance-based fees, which is based on capital gains in the client account.

Item 7: Types of Clients and Account Minimums

Wilco Financial, LLC provides advisory services to individuals, pension and profit sharing plans and other ERISA accounts, trusts, estates, and business entities.

While we have no minimum account size, accounts or households with a total value below \$200,000 are subject to a minimum annual fee of \$1,700 or 1.85% of assets under management per year, whichever is less.

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

Analysis utilized includes charting, fundamental, technical, and cyclical.

Wilco Financial, LLC uses asset allocation strategies for portfolio management.

By its nature, financial planning looks to the long-term. After the client's short-term cash needs and emergency fund is evaluated, investment strategies are designed to help the client achieve his or her financial goals. Insurance is reviewed only at the client's request, and would be provided by an outside firm.

While there is risk in all investments, some carry a greater degree of risk or higher costs. There is no guarantee that the investment strategy selected for the client will result in the client's goals being met, nor is there any guarantee of profit or protection from loss. For those investments sold by prospectus, clients should read the prospectus in full.

Wilco Financial, LLC is disclosing those risks and opportunities for our investment strategy or for particular types of securities used.

- Debt securities are subject to interest rate risk.
- High yield securities are corporate debt securities rated below investment grade and carry a higher risk of default than investment grade debt securities.
- We do not generally rely on timing to reduce risks, but may seek to time our purchases or sales when it appears prudent to do so. However, timing the markets or specific positions carries with it its own set of risks, as market trends can change at any time, or persist for much longer than consensus expectations.
- There are tax consequences of short-term rebalancing and trading which can result in capital gains being taxed as ordinary income.
- Our investment style emphasizes diversification and quality. Asset allocations may not always be similar to those of the broader equities and bond markets as a whole and may generate returns that are higher or lower than global or domestic markets as a whole.

Item 9: Disciplinary Information

An investment advisor must disclose material facts about any legal or disciplinary event that is material to a client's evaluation of the advisory business or of the integrity of its management personnel. Wilco Financial, LLC does not have any such disclosure items.

Item 10: Other Financial Industry Activities and Affiliations

An investment advisor must disclose material facts about any other financial industry activities and affiliations, particularly those which might create a conflict of interest. Wilco Financial, LLC does not have any such other financial industry activities or affiliations.

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

Code of Ethics

Wilco Financial, LLC maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel; requires compliance with federal securities laws; and, addresses conflicts that arise from personal trading by advisory personnel. Clients may request a copy of the Code of Ethics.

Participation or Interest in Client Transactions

From time to time, some of the IA Reps/registered representatives may recommend limited partnerships, separately managed accounts, or mutual funds that are sponsored by Wilco Financial, LLC's affiliated companies. This would be when the recommendation is suitable for the client and meets their investment objectives. Clients are not obligated to allocate capital to any such investments.

Personal Trading

At times Wilco Financial, LLC and/or its IA Reps may take positions in the same securities as clients, and we will try to avoid conflicts with clients. The firm and its IA Reps will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. We will not violate our fiduciary responsibilities to our clients. Scalping (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (i.e. a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e. a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price), would not be disclosed at the time of trading.

Principal Trades

Wilco Financial, LLC does not buy securities for itself from, or sell securities it owns to any client.

Agency Cross Transactions

Wilco Financial, LLC does not engage in agency cross transactions.

Item 12: Brokerage Practices

Selection or Recommendation of Broker/Dealers

For managed investment clients, it is recommended, and clients may choose to, implement trades and maintain custody of assets through a discount broker. The services of Charles Schwab & Company, Inc. are recommended. The selection is made on the discount rates and execution services available to the client. Clients may pay transaction fees to Charles Schwab & Company, Inc. for the purchase of "no-load" funds. Charles Schwab & Company, Inc. provides the clients with consolidated statements.

Wilco Financial, LLC is not affiliated with Charles Schwab & Company, Inc. IA Reps of our firm are not registered representatives of Charles Schwab & Company, Inc. and do not receive any commissions or fees from recommending these services.

Soft Dollar Practices

Wilco Financial, LLC may receive compensation from a brokerage firm in the form of research, products or services ("soft dollars"). When a firm uses client brokerage commissions to obtain soft dollars, the firm receives a benefit by not having to produce or pay for such items. A firm may have an incentive to select or recommend a broker/dealer based on soft dollars received, rather than best execution for the client.

Wilco Financial, LLC may receive soft dollar compensation from Charles Schwab & Company, Inc. for research services to include reports and software.

Wilco Financial, LLC understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all Wilco Financial, LLC clients, and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While Wilco Financial, LLC may not always obtain the lowest commission rate, Wilco Financial, LLC believes the rate is reasonable in relation to the value of the brokerage and research services provided.

Client Referrals From Brokers

Wilco Financial, LLC does not expect to receive client referrals from brokers. Where the client is not referred by an existing broker/dealer, Wilco Financial, LLC recommends a broker/dealer with competitive commission rates.

Directed Brokerage

Managed investment clients may direct brokerage to a specified broker/dealer other than the firm recommended by Wilco Financial, LLC. It is up to the client to negotiate the commission rate, as Wilco Financial, LLC will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker/dealer used by Wilco Financial, LLC. In client directed brokerage arrangements, the client may not be able to participate in aggregated ("blocked") trades, which may help reduce the cost of execution. Where the client does not otherwise designate a broker/dealer, Wilco Financial, LLC recommends a broker/dealer with competitive commission rates.

Trade Aggregation

While individual client advice is provided for each account, managed investment clients' trades may be executed as a block trade. The Advisor encourages its existing and new clients to use the Advisor's "lead custodian." Only accounts in the custody of the lead custodian would have the opportunity to participate in aggregated securities transactions. All trades using the lead custodian will be aggregated and done in the name of the Advisor. The executing broker will be informed that the trades are for the account of the Advisor's clients and not for the Advisor itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The aggregation should, on average, reduce slightly the costs of execution, and the Advisor will not aggregate a client's order if in a particular instance the Advisor believes that aggregation would cause the client's cost of execution to be increased. The Custodian will be notified of the amount of each trade for each account. The Advisor and/or its IA Reps may participate in block trades with clients, and may also participate on a pro rata basis for partial fills, but only if clients receive fair and equitable treatment.

Item 13: Review of Accounts and Reports on Accounts

Reviews

Wilco Financial, LLC monitors the individual investments within client's managed investment accounts each day the market is open. Portfolio performance is reviewed on a quarterly basis at a minimum. Wilco Financial, LLC offers managed investment clients an in-person portfolio review meeting on an annual basis.

Managed investment accounts are reviewed at a minimum of once per quarter. Market conditions that might cause a wide variance in the specified asset allocation, or other factors could cause a more frequent review.

The financial plan is a snapshot in time and no ongoing reviews are conducted. We recommend clients engage us on an annual basis to update the financial plan.

Reports

All clients receive standard account statements from investment sponsors and brokerage firms. Managed investment clients receive a written quarterly performance report from Wilco Financial, LLC.

Item 14: Client Referrals & Other Compensation

Referral Fees Paid

Neither Wilco Financial, LLC, nor any related person provides compensation for client referrals.

Referral Fees Received

Wilco Financial, LLC does not exercise agreements with other Registered Investment Advisors to recommend other Advisors to clients, and does not receive referral fees from such activities or from any other source.

Sales Awards

Wilco Financial, LLC does not participate in any programs that generate sales awards from a broker dealer, or any other third party.

Item 15: Custody

Although client assets are held at a third-party independent custodian, Wilco Financial, LLC is deemed to have custody of client funds because of the fee deduction authority granted by the client in the investment advisory agreement. Except for this fee deduction, we do not have authority to withdraw funds out of client accounts.

Wilco Financial, LLC does not accept Standing Letters of Authorization (“SLOA”) to the account custodian to disburse funds to a third party.

Inadvertent custody may occur if/when the custodial agreement signed by the client may grant our firm broader access to client funds or securities than our own agreement with the client contemplates. Under such circumstances, our firm will follow regulatory guidance in documenting this procedure.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian. Client is urged to compare custodial account statements against statements prepared by Wilco Financial, LLC for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of your account for tax purposes.

Item 16: Investment Discretion

Wilco Financial, LLC maintains full discretion under a limited power of attorney as to the securities and amount of securities.

Wilco Financial, LLC will not have authority to withdraw funds or to take custody of client funds or securities, other than under the terms of the Fee Payment Authorization clause in the Agreement with the client.

The client will designate the broker/dealer to be used for trading and custodial services. Wilco Financial, LLC may “trade away” for bond transactions in order to seek best execution. The bonds will be custodied at the broker/dealer designated by the client under a prime brokerage arrangement.

Item 17: Voting Client Securities

Wilco Financial, LLC does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

Item 18: Financial Information

An investment advisor must provide financial information if a threshold of fee prepayments is met; there is a financial condition likely to impair the ability to meet contractual commitments; or, a bankruptcy within the past ten years. Wilco Financial, LLC does not have any disclosure items in this section.

Wilco Financial, LLC does not solicit prepayment of more than \$500 in fees per client six (6) months in advance.

Item 19: Requirements for State Registered Advisors

Wilco Financial, LLC's Principal Executive Officer is Jonathan Gillett. Information regarding Jonathan Gillett's Education, Background and Other Businesses can be found in his supplemental ADV Part 2B brochure.

Jonathan Gillett also serves as the President of Gillett Properties, Ltd., is a co-owner of Cigar Station TN, LLC based in Spring Hill, TN, and devotes approximately 40% of working hours to those entities.

As stated in Item 6, Wilco Financial, LLC does not charge performance-based fees or other fees based on a share of capital gains on or on capital appreciation of client assets.

Neither Wilco Financial, LLC nor our employees have been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither Wilco Financial, LLC nor our employees have any relevant material relationships with issuers of securities.