

EXHIBIT 1

BrokerCheck Report

WILLIAM BRUCE SMITH

CRD# 1335193

Report #31233-94951, data current as of Wednesday, March 21, 2012.

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Dear Investor:

FINRA has generated the following BrokerCheck report for WILLIAM B. SMITH. The information contained within this report has been provided by a FINRA member firm(s) and securities regulators as part of the securities industry's registration and licensing process and represents the most current information reported to the Central Registration Depository (CRD®) system.

FINRA regulates the securities markets for the ultimate benefit and protection of the investor. FINRA believes the general public should have access to information that will help them determine whether to conduct, or continue to conduct, business with a FINRA member firm or any of the member's associated persons. To that end, FINRA has adopted a public disclosure policy to make certain types of information available to you. Examples of information FINRA provides on currently registered individuals and individuals who were registered during the past ten years include: actions by regulators, investment-related civil suits, customer disputes that contain allegations of sales practice violations against brokers, all felony charges and convictions, misdemeanor charges and convictions relating to securities violations, and financial events such as bankruptcies, compromises with creditors, judgments, and liens. FINRA also provides on a permanent basis certain information on former registered individuals, if any of the following applies, as reported to CRD on a uniform registration form: (1) the person was the subject of a final regulatory event; (2) the person was convicted of or pled guilty or nolo contendere to a crime; (3) the person was the subject of a civil injunction or civil court finding involving a violation of any investment-related statute(s) or regulation(s); or (4) the person was named as a respondent or defendant in an arbitration or civil litigation that resulted in an award, decision or judgment for a customer.

When evaluating this report, please keep in mind that it may include items that involve pending actions or allegations that may be contested and have not been resolved or proven. Such items may, in the end, be withdrawn or dismissed, or resolved in favor of the firm or broker, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

The information in this report is not the only resource you should consult. FINRA recommends that you learn as much as possible about the individual broker or brokerage firm from other sources, such as professional references, local consumer and investment groups, or friends and family members who already have established investment business relationships.

FINRA BrokerCheck is governed by federal law, Securities and Exchange Commission (SEC) regulations and FINRA rules approved by the SEC. State disclosure programs are governed by state law, and may provide additional information on brokers and firms licensed by the state. Therefore, you should also consider requesting information from your state securities regulator. Refer to www.nasaa.org for a complete list of state securities regulators.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at

brokercheck.finra.org

For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources.

For more information about FINRA, visit www.finra.org.

WILLIAM B. SMITH

CRD# 1335193

This broker is not currently registered with a FINRA firm.

Report Summary for this Broker



The report summary provides an overview of the broker's professional background and conduct. The individual broker, a FINRA-registered firm(s), and/or securities regulator(s) have provided the information contained in this report as part of the securities industry's registration and licensing process. The information contained in this report was last updated by the broker, a previous employing brokerage firm, or a securities regulator on 02/02/2012.

Broker Qualifications

This broker is not currently registered with a FINRA firm.

This broker has passed:

- 1 Principal/Supervisory Exam
- 3 General Industry/Product Exams
- 1 State Securities Law Exam

Registration and Employment History

This broker was previously registered with the following FINRA member firms:

TRIAD ADVISORS, INC.

CRD# 25803
SHREWSBURY, MA
06/2003 - 08/2011

RAYMOND JAMES FINANCIAL SERVICES, INC.

CRD# 6694
ST. PETERSBURG, FL
09/1997 - 06/2003

ROYAL ALLIANCE ASSOCIATES, INC.

CRD# 23131
NEW YORK, NY
01/1997 - 09/1997

For additional registration and employment history details as reported by the individual broker, refer to the Registration and Employment History section of this report.

Disclosure of Customer Disputes, Disciplinary, and Regulatory Events

This section includes details regarding disclosure events reported by or about this broker to CRD as part of the securities industry registration and licensing process. Examples of such disclosure events include formal investigations and disciplinary actions initiated by regulators, customer disputes, certain criminal charges and/or convictions, as well as financial disclosures, such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this broker? **Yes**

The following types of disclosures were reported:

- Customer Dispute
- Termination

Broker Qualifications



Registrations

This section provides the self-regulatory organizations (SROs), states and U.S. territories the broker is currently registered and licensed with, the category of each registration, and the date on which the registration became effective. This section also provides the physical location of each branch that the individual broker is associated with for each listed employment.

This broker is not currently registered with a FINRA firm.

Broker Qualifications



Industry Exams this Broker has Passed

This section includes all current principal/supervisory, general product/industry, and/or state securities law exams that the broker has passed. Under certain, limited circumstances, a broker may receive a waiver of an exam requirement based on a combination of previous exams passed and qualifying work experience. Likewise, a new exam requirement may be grandfathered based on a broker's specific qualifying work experience. Information regarding instances of exam waivers or the grandfathering of an exam requirement are not included as part of the BrokerCheck report.

This individual has passed 1 principal/supervisory exam, 3 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
General Securities Principal Examination	Series 24	11/08/1994

General Industry/Product Exams

Exam	Category	Date
Investment Company Products/Variable Contracts Representative Examination	Series 6	03/01/1985
General Securities Representative Examination	Series 7	08/29/1994
Direct Participation Programs Representative Examination	Series 22	07/26/1985

State Securities Law Exams

Exam	Category	Date
Uniform Securities Agent State Law Examination	Series 63	03/01/1985

Additional information about the securities industry's qualifications and continuing education requirements, as well as the examinations administered by FINRA to brokers and other securities professionals can be found at <http://www.finra.org/Industry/Compliance/Registration/QualificationsExams/index.htm>.



Registration and Employment History

Previously Registered with the Following FINRA Firms

FINRA records show this broker previously held FINRA registrations with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
06/2003 - 08/2011	TRIAD ADVISORS, INC.	25803	SHREWSBURY, MA
09/1997 - 06/2003	RAYMOND JAMES FINANCIAL SERVICES, INC.	6694	ST. PETERSBURG, FL
01/1997 - 09/1997	ROYAL ALLIANCE ASSOCIATES, INC.	23131	NEW YORK, NY
08/1993 - 01/1997	KEOGLER, MORGAN & COMPANY, INC.	16546	ATLANTA, GA
05/1992 - 08/1993	MML INVESTORS SERVICES, INC.	10409	SPRINGFIELD, MA
12/1989 - 01/1991	LINSCO/PRIVATE LEDGER CORP.	6413	BOSTON, MA
02/1989 - 12/1989	LINSCO FINANCIAL GROUP, INC.	524	
06/1985 - 02/1989	COMMONWEALTH EQUITY SERVICES, INC.	8032	
03/1985 - 07/1985	BNL SECURITIES INC.	10641	

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with a FINRA firm and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment Dates	Employer Name	Employer Location
06/2003 - Present	TRIAD ADVISORS, INC.	NORCROSS, GA
09/1991 - Present	SMITH GAUDETTE FINANCIAL SERVICES	GRATTON, MA
01/1983 - Present	W.B. SMITH FINANCIAL GROUP	GRATTON, MA
09/1997 - 06/2003	RAYMOND JAMES FINANCIAL SERVICES, INC.	GRAFTON, MA

Registration and Employment History



Affiliations

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

1. WBS PROPERTIES, LLC; INVESTMENT RELATED; 2 SOUTH ST; OFFICE BUILDING; PROPERTY MAANGER;
5.2005; 10-25HRS/MO; PROPERTY APPRECIATION;

Disclosure of Customer Disputes, Disciplinary, and Regulatory Events



What you should know and/or consider regarding any reported disclosure events:

- Before reaching a conclusion regarding any of the information contained in this BrokerCheck report, you should ask the broker to clarify the specific event(s) listed, or to provide a response to any questions you may have.
- "Pending" actions involve unproven and/or unsubstantiated allegations.

Disclosures in BrokerCheck reports come from different sources:

- **Self-disclosure:** Brokers are required to answer a series of questions on their application requesting securities industry registration (Form U4). For example, brokers are asked whether they have been involved in certain regulatory, civil, criminal and financial matters (e.g., bankruptcy), or have been the subject of a customer dispute.
- **Regulator/Employer postings:** In addition, regulators and firms that have employed a broker also may contribute relevant information about such matters. All of this information is maintained in CRD.

Certain thresholds must be met before an event is reported to CRD; for example:

- A law enforcement agency must file formal charges before a broker is required to report a particular criminal event.
- Likewise, a regulatory agency must meet established standards before initiating a regulatory action and/or issuing sanctions. These standards typically include a reasonable basis for initiating the action after engaging in a fact-finding process.

In order for a customer dispute to be reported to CRD, a customer must:

- Allege that their broker engaged in activity that violates certain rules or conduct governing the industry; and
- Claim damages of \$5,000 or more as a result of that activity.

(Note: customer disputes may be more subjective in nature than a criminal or regulatory action)

What you should consider when evaluating the status or disposition of a reported disclosure event:

- Disclosure events may be *pending, on appeal, or final*. *Pending and 'on appeal'* matters reflect allegations that (1) have not been proven or formally adjudicated, or (2) have been adjudicated but are currently being appealed. *Final* matters generally may be *adjudicated, settled or otherwise resolved*.
 - An **adjudicated matter** includes a disposition by (1) a court of law in a criminal or civil matter or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A **settled matter** generally represents a disposition wherein parties involved in a dispute reach an agreement to resolve the matter.
- (Note: brokers may choose to settle customer disputes or regulatory matters for business or other reasons)
- Customer disputes also may be **resolved** without any payment to the customer or any finding of wrongdoing on the part of the individual broker.

Possible multiple reporting sources -- please note:

Disclosure details may be reported by more than one source (i.e., regulator, firm, or broker). When this occurs, all versions of the event will appear in the BrokerCheck report. The different versions of the same disclosure event are separated by a solid line with the reporting source labeled.



	Pending	Final	On Appeal
Customer Dispute	1	3	N/A
Termination	N/A	2	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a number of items may involve pending actions or allegations that may be contested and have not been resolved or proven. The items may, in the end, be withdrawn or dismissed, or resolved in favor of the individual broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD by the individual broker, a member firm(s), and/or by securities industry regulators. Some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Customer Dispute Settled

This section provides information regarding a settled customer dispute that was reported to CRD by the individual broker, a member firm, and/or a securities regulator. The event may include a consumer-initiated complaint, investment-related arbitration proceeding or civil suit that contains allegations of sale practice violations against the individual broker and resulted in a monetary settlement to the customer(s).

Disclosure 1 of 2

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	RAYMOND JAMES FINANCIAL SERVICES, INC.
Allegations:	CLAIMANT ALLEGES BREACH OF CONTRACT; BREACH OF FIDUCIARY DUTY; FAILURE TO SUPERVISE; FRAUD; UNAUTHORIZED TRADING; NEGLIGENCE
Product Type:	Options
Alleged Damages:	\$68,000.00

Customer Complaint Information

Date Complaint Received:	01/07/2003
Complaint Pending?	No
Status:	Arbitration/Reparation
Status Date:	01/07/2003
Settlement Amount:	

Individual Contribution Amount:



Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD CASE# 02-07714

Date Notice/Process Served: 01/07/2003

Arbitration Pending? No

Disposition: Settled

Disposition Date: 11/17/2003

Monetary Compensation Amount: \$35,000.00

Individual Contribution Amount: \$35,000.00

Summary: AMOUNT REFLECTED UNDER INDIVIDUAL CONTRIBUTION IS AMOUNT FINANCIAL ADVISOR IS REQUIRED TO PAY PURSUANT TO CONTRACT SIGNED BY INDIVIDUAL.

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC

Allegations: CLIENT ALLEGES BREACH OF CONTRACT; BREACH OF FIDUCIARY DUTY; FAILURE TO SUPERVISE; FRAUD; UNAUTHORIZED TRADING

Product Type: Options

Alleged Damages: \$68,000.00

Customer Complaint Information

Date Complaint Received: 01/07/2003

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 01/07/2003

Settlement Amount:

Individual Contribution Amount:



Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD CASE# 02-07714

Date Notice/Process Served: 01/07/2003

Arbitration Pending? No

Disposition: Settled

Disposition Date: 11/17/2003

Monetary Compensation Amount: \$35,000.00

Individual Contribution Amount: \$35,000.00

Disclosure 2 of 2

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC.

Allegations: CLAIMANT ALLEGES UNSUITABILITY, UNAUTHORIZED TRADING, AND FAILURE TO SUPERVISE.

Product Type: Other

Other Product Type(s): STOCKS

Alleged Damages: \$900,000.00

Customer Complaint Information

Date Complaint Received: 12/09/2002

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 12/09/2002

Settlement Amount:

Individual Contribution Amount:

Arbitration Information



Arbitration/Reparation Claim filed with and Docket/Case No.: NASD CASE# 02-7240

Date Notice/Process Served: 12/09/2002

Arbitration Pending? No

Disposition: Settled

Disposition Date: 06/14/2004

Monetary Compensation Amount: \$360,000.00

Individual Contribution Amount: \$360,000.00

Summary: AMOUNT UNDER INDIVIDUAL CONTRIBUTION IS AMOUNT THE FINANCIAL ADVISOR IS REQUIRED TO PAY PURSUANT TO CONTRACT SIGNED BY INDIVIDUAL.

Reporting Source: Broker

Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC

Allegations: CLAIMANT ALLEGS UNSUITABILITY; UNAUTHORIZED TRADING, AND FAILURE TO SUPERVISE

Product Type: Other

Other Product Type(s): STOCKS

Alleged Damages: \$900,000.00

Customer Complaint Information

Date Complaint Received: 12/09/2002

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 12/09/2002

Settlement Amount:

Individual Contribution Amount:



Arbitration Information

**Arbitration/Reparation Claim
filed with and Docket/Case
No.:** NASD# 02-7240

Date Notice/Process Served: 12/09/2002

Arbitration Pending? No

Disposition: Settled

Disposition Date: 06/14/2004

**Monetary Compensation
Amount:** \$360,000.00

**Individual Contribution
Amount:** \$360,000.00

Summary: AMOUNT UNDER INDIVIDUAL CONTRIBUTION IS AMOUNT THE FINANCIAL
ADVISOR IS REQUIRED TO PAY PURSUANT TO CONTRACT SIGNED BY
INDIVIDUAL



Customer Complaints Reported to CRD by the Individual Broker, a Member Firm, and/or a Securities Regulator

This section provides information regarding a final, customer dispute that was reported to CRD by the individual broker, a member firm, and/or a securities regulator. The event may include a final, consumer-initiated, investment-related arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual broker and did not result in an award for monetary damages in favor of the customer(s), and was dismissed, withdrawn, or denied. It may also include a final, consumer-initiated, investment-related written complaint, which contains either allegations of sales practice violations against the broker and compensatory damages of \$5,000 or more, or includes allegations of forgery, theft, or misappropriation or conversion of funds or securities that was closed without action, withdrawn or denied.

Disclosure 1 of 1

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC

Allegations: CLAIMANT ALLEGES OPTIONS INVESTMENTS WERE NOT SUITABLE. FURTHERMORE, CLAIMANT ALLEGES THAT CERTAIN CASH TRANSFERS WERE MADE BETWEEN HIS INDIVIDUAL RETIREMENT ACCOUNT WITHOUT HIS AUTHORIZATION. INCIDENT DATES: 1999-2002.

Product Type: Options
Alleged Damages: \$365,000.00

Customer Complaint Information

Date Complaint Received: 12/20/2004
Complaint Pending? No
Status: Closed/No Action
Status Date: 06/09/2005

Settlement Amount:
Individual Contribution Amount:

Reporting Source: Broker
Employing firm when activities occurred which led to the complaint: RAYMOND JAMES FINANCIAL SERVICES, INC

Allegations: CLAIMANT ALLEGES OPTIONS INVESTMENTS WERE NOT SUITABLE. FURTHERMORE, CLAIMANT ALLEGES THAT CERTAIN CASH TRANSFERS



WERE MADE BETWEEN HIS INDIVIDUAL RETIREMENT ACCOUNT WITHOUT HIS AUTHORIZATION.

Product Type: Options
Alleged Damages: \$365,000.00

Customer Complaint Information

Date Complaint Received: 12/20/2004
Complaint Pending? No
Status: Closed/No Action
Status Date: 06/09/2005

Settlement Amount:
Individual Contribution Amount:



Customer Dispute - Pending

This section provides information regarding pending customer disputes that was reported to CRD by the individual broker, a member firm, and/or a securities regulator. The event may include a pending consumer-initiated, investment-related arbitration proceeding or civil suit that contains allegations of sales practice violations against the broker. It may also include a pending, consumer-initiated, investment-related written complaint, which contains either allegations of sales practice violations and compensatory damages of \$5,000 or more, or allegations of forgery, theft or misappropriation or conversion of funds or securities.

Disclosure 1 of 1

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: TRIAD ADVISORS, INC.

Allegations: CLIENT STATES THAT SHE GAVE REPRESENTATIVE 2 SEPARATE \$50,000 CHECKS FOR INVESTMENTS IN CERTIFICATE OF DEPOSITS IN SEPTEMBER AND OCTOBER 2003. CLIENT STATES THAT SECURITIES WERE NEVER PURCHASED AND THAT FUNDS WERE WRONGLY DEPOSITED INTO ACCOUNTS THAT WERE NOT OWNED BY HER.

Product Type: CD

Alleged Damages: \$100,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 01/30/2012

Complaint Pending? Yes

Settlement Amount:

Individual Contribution Amount:



Employment Separation And Allegations

This section provides information regarding a separation of employment, that was reported to CRD by the individual broker, a member firm, and/or a securities regulator. The event may include a separation of employment that resulted in a voluntary resignation, discharge or permission to resign after allegations were made that accused the broker of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

Disclosure 1 of 2

Reporting Source: Firm
Employer Name: TRIAD ADVISORS, INC.
Termination Type: Discharged
Termination Date: 08/16/2011
Allegations: VIOLATION OF FIRM POLICY REGARDING CUSTOMER SIGNATURES.
Product Type: No Product

Disclosure 2 of 2

Reporting Source: Broker
Employer Name: LINSKO/PRIVATE LEDGER
Termination Type: Discharged
Termination Date: 01/04/1991
Allegations: NONE N/A
 PASSING A CLIENT CHECK THROUGH A CORPORATE CHECKING ACCOUNT TO PURCHASE ANNUITY CONTRACT.
Product Type: No Product
Other Product Types:
Summary: NASD SIMPLY ASKED FOR A LETTER FROM ME STATING THAT I AM AWARE OF THE ISSUE ON DEPOSITING CLIENT TRADES TO A COMPANY ACCOUNT AND THAT I WOULD NOT PROCESS A TRANSACTION IN THIS MANNER AGAIN. NO PROCEEDING, CLEARED OF ANY ALLEGATION.



About this BrokerCheck Report

BrokerCheck reports are part of a FINRA initiative to disclose information about FINRA-registered firms and individual brokers to help investors determine whether to conduct, or continue to conduct, business with these firms and brokers. The information contained within these reports is collected through the securities industry's registration and licensing process.

Who provides the information in BrokerCheck?

Information made available through BrokerCheck is obtained from CRD as reported through the industry registration and licensing process.

The forms used by brokerage firms, to report information as part of the firms registration and licensing process, Forms BD and BDW, are established by the SEC and adopted by all state securities regulators and SROs. FINRA and the North American Securities Administrators Association (NASAA) establish the Forms U4 and U5, the forms that are used for the registration and licensing process for individual brokers. These forms are approved by the SEC. Regulators report disciplinary information for firms and individual brokers via Form U6.

How current is the information contained in BrokerCheck?

Brokerage firms and brokers are required to keep this information accurate and up-to-date (typically not later than 30 days after learning of an event). BrokerCheck data is updated when a firm, broker, or regulator submits new or revised information to CRD. Generally, updated information is available on BrokerCheck Monday through Friday.

What information is NOT disclosed through BrokerCheck?

Information that has not been reported to CRD and certain information that is no longer required to be reported through the registration and licensing process is not disclosed through BrokerCheck. Examples of events that are not required to be reported or are no longer reportable include: judgments and liens originally reported as outstanding that have been satisfied and bankruptcy proceedings filed more than 10 years ago.

Additional information not disclosed through BrokerCheck includes Social Security Numbers, residential history information, and physical description information. On a case-by-case basis, FINRA reserves the right to exclude information that contains confidential customer information, offensive and potentially defamatory language or information that raises significant identity theft or privacy concerns that are not outweighed by investor protection concerns. FINRA Rule 8312 describes in detail what information is and is not disclosed through BrokerCheck.

Under FINRA's current public disclosure policy, in certain limited circumstances, most often pursuant to a court order, information is expunged from CRD. Further information about expungement from CRD is available in FINRA notices 99-09, 99-54, 01-65, and 04-16 at www.finra.org.

For further information regarding FINRA's BrokerCheck program, please visit FINRA's Web site at www.finra.org/brokercheck or call the FINRA BrokerCheck Hotline at (800) 289-9999. This hotline is open Monday through Friday from 8:00 a.m. to 8:00 p.m., Eastern Time (ET).

For more information about the following, select the associated link:

- About BrokerCheck Reports: http://www.finra.org/brokercheck_reports
- Glossary: http://www.finra.org/brokercheck_glossary
- Questions Frequently Asked about BrokerCheck Reports: http://www.finra.org/brokercheck_faq
- Terms and Conditions: <http://brokercheck.finra.org/terms.aspx>

EXHIBIT 2

FORM ADV UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

OMB: 3235-0049

Primary Business Name: SMITH WB FINANCIAL GROUP	IARD/CRD Number: 107543
Rev. 11/2010	

WARNING: Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 3.

Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you.

- A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):
SMITH WILLIAM BRUCE
- B. Name under which you primarily conduct your advisory business, if different from Item 1.A.
SMITH WB FINANCIAL GROUP
List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.
- C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.), enter the new name and specify whether the name change is of
 your legal name or your primary business name:
- D. If you are registered with the SEC as an investment adviser, your SEC file number:
801- 33087
- E. If you have a number ("CRD Number") assigned by FINRA's CRD system or by the IARD system, your CRD number: 107543
If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

F. Principal Office and Place of Business

(1) Address (do not use a P.O. Box):

Number and Street 1: TWO SOUTH STREET	Number and Street 2:
City: GRAFTON	State: MA
Country: UNITED STATES	ZIP+4/Postal Code: 01519

If this address is a private residence, check this box:
List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for registration, or are registered only, with the SEC, list the largest five offices in terms of numbers of employees.

(2) Days of week that you normally conduct business at your principal office and place of business:

Monday-Friday Other:

Normal business hours at this location:

Item 2 SEC Registration

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2 only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration.

A. To register (or remain registered) with the SEC, you must check at least one of the Items 2.A (1) through 2.A(11), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A(12). You:

(1) have *assets under management* of \$25 million (in U.S. dollars) or more;

See Part 1A Instruction 2.a. to determine whether you should check this box.

(2) have your *principal office and place of business* in Wyoming;

(3) have your *principal office and place of business* outside the United States;

(4) are an investment adviser (or sub-adviser) to an investment company registered under the Investment Company Act of 1940;

See Part 1A Instruction 2.b. to determine whether you should check this box.

(5) have been designated as a nationally recognized statistical rating organization;

See Part 1A Instruction 2.c. to determine whether you should check this box.

(6) are a pension consultant that qualifies for the exemption in rule 203A-2(b);

See Part 1A Instruction 2.d. to determine whether you should check this box.

(7) are relying on rule 203A-2(c) because you are an investment adviser that *controls, is controlled by, or is under common control with*, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;

See Part 1A Instruction 2.e. to determine whether you should check this box. If you check this box, complete Section 2.A(7) of Schedule D.

(8) are a newly formed adviser relying on rule 203A-2(d) because you expect to be eligible for SEC registration within 120 days;

See Part 1A Instruction 2.f. to determine whether you should check this box. If you check this box, complete Section 2.A(8) of Schedule D.

(9) are a multi-state adviser relying on rule 203A-2(e);

See Part 1A Instruction 2.g. to determine whether you should check this box. If you check this box, complete Section 2.A(9) of Schedule D.

(10) are an Internet investment adviser relying on rule 203A-2(f);

See Part 1A Instructions 2.h. to determine whether you should check this box.

(11) have received an SEC *order* exempting you from the prohibition against registration with the SEC;

If you checked this box, complete Section 2.A(11) of Schedule D.

(12) are no longer eligible to remain registered with the SEC.

See Part 1A Instructions 2.i. to determine whether you should check this box.

B. Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. If this is an initial application, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings you submit to the SEC. If this is an amendment to direct your *notice filings* to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

<input type="checkbox"/> AL	<input type="checkbox"/> ID	<input type="checkbox"/> MO	<input type="checkbox"/> PA
<input type="checkbox"/> AK	<input type="checkbox"/> IL	<input type="checkbox"/> MT	<input type="checkbox"/> PR
<input type="checkbox"/> AZ	<input type="checkbox"/> IN	<input type="checkbox"/> NE	<input type="checkbox"/> RI
<input type="checkbox"/> AR	<input type="checkbox"/> IA	<input type="checkbox"/> NV	<input type="checkbox"/> SC
<input type="checkbox"/> CA	<input type="checkbox"/> KS	<input checked="" type="checkbox"/> NH	<input type="checkbox"/> SD
<input type="checkbox"/> CO	<input checked="" type="checkbox"/> KY	<input type="checkbox"/> NJ	<input checked="" type="checkbox"/> TN
<input type="checkbox"/> CT	<input type="checkbox"/> LA	<input type="checkbox"/> NM	<input type="checkbox"/> TX
<input type="checkbox"/> DE	<input type="checkbox"/> ME	<input type="checkbox"/> NY	<input type="checkbox"/> UT
<input type="checkbox"/> DC	<input type="checkbox"/> MD	<input type="checkbox"/> NC	<input type="checkbox"/> VT
<input checked="" type="checkbox"/> FL	<input checked="" type="checkbox"/> MA	<input type="checkbox"/> ND	<input type="checkbox"/> VI
<input type="checkbox"/> GA	<input type="checkbox"/> MI	<input type="checkbox"/> OH	<input type="checkbox"/> VA
<input type="checkbox"/> GU	<input type="checkbox"/> MN	<input type="checkbox"/> OK	<input type="checkbox"/> WA
<input type="checkbox"/> HI	<input type="checkbox"/> MS	<input type="checkbox"/> OR	<input type="checkbox"/> WV
			<input type="checkbox"/> WI

If you are amending your registration to stop your notice filings from going to a state that currently receives them and you do not want to pay that state's notice filing fee for the coming year, your amendment must be filed before the end of the year (December 31).

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Item 3 Form Of Organization

A. How are you organized?

- Corporation Sole Proprietorship Limited Liability Partnership (LLP)
 Partnership Limited Liability Company (LLC) Other (specify):

If you are changing your response to this Item, see Part 1A Instruction 4.

B. In what month does your fiscal year end each year?

December

C. Under the laws of what state or country are you organized?

State: Country:
Massachusetts UNITED STATES

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Item 4 Successions

YES NO

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser?

If "yes," complete Item 4.B. and Section 4 of Schedule D.

B. Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

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Item 5 Information About Your Advisory Business
Responses to this Item help us understand your business, assist us in preparing for on-site

examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly-formed advisers for completing this Item 5.

Employees

A. Approximately how many *employees* do you have? Include full and part-time *employees* but do not include any clerical workers.

- 1-5
 6-10
 11-50
 51-250
 251-500
 501-1,000
 More than 1,000
 If more than 1,000, how many?
 (round to the nearest 1,000)

B.

(1) Approximately how many of these *employees* perform investment advisory functions (including research)?

- 0
 1-5
 6-10
 11-50
 51-250
 251-500
 501-1,000
 More than 1,000
 If more than 1,000, how many?
 (round to the nearest 1,000)

(2) Approximately how many of these *employees* are registered representatives of a broker-dealer?

- 0
 1-5
 6-10
 11-50
 51-250
 251-500
 501-1,000
 More than 1,000
 If more than 1,000, how many?
 (round to the nearest 1,000)

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Items 5.A(1) and 5.B(2). If an employee performs more than one function, you should count that employee in each of your responses to Item 5.B(1) and 5.B(2).

(3) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

- 0
 1-5
 6-10
 11-50
 51-250
 251-500
 501-1,000
 More than 1,000
 If more than 1,000, how many?
 (round to the nearest 1,000)

In your response to Item 5.B(3), do not count any of your employees and count a firm only once -- do not count each of the firm's employees that solicit on your behalf.

Clients

C. To approximately how many *clients* did you provide investment advisory services during your most-recently completed fiscal year?

- 0
 1-10
 11-25
 26-100
 101-250
 251-500
 More than 500
 If more than 500, how many?
 (round to the nearest 500)

D. What types of *clients* do you have? Indicate the approximate percentage that each type of *client* comprises of your total number of *clients*.

- | | None
Up
to
10% | 11-
25% | 26-
50% | 51-
75% | More
Than
75% |
|---|-------------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| (1) Individuals (other than <i>high net worth individuals</i>) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| (2) <i>High net worth individuals</i> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

- (3) Banking or thrift institutions
- (4) Investment companies (including mutual funds)
- (5) Pension and profit sharing plans (other than plan participants)
- (6) Other pooled investment vehicles (e.g., hedge funds)
- (7) Charitable organizations
- (8) Corporations or other businesses not listed above
- (9) State or municipal *government entities*
- (10) Other:

The category "individuals" includes trusts, estates, 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, check "None" in response to Item 5.D(4).

Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

- (1) A percentage of assets under your management
- (2) Hourly charges
- (3) Subscription fees (for a newsletter or periodical)
- (4) Fixed fees (other than subscription fees)
- (5) Commissions
- (6) *Performance-based fees*
- (7) Other (specify):

Assets Under Management

- F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios? YES NO
- (2) If yes, what is the amount of your assets under management and total number of accounts?
- | | U.S. Dollar Amount | Total Number of Accounts |
|--------------------|---------------------|--------------------------|
| Discretionary: | (a) \$ 42500000.00 | (d) 22 |
| Non-Discretionary: | (b) \$ 245000000.00 | (e) 235 |
| Total: | (c) \$ 287500000.00 | (f) 257 |

Part 1A Instruction 5.b. explains how to calculate your assets under management. You must follow these instructions carefully when completing this Item.

Advisory Activities

G. What type(s) of advisory services do you provide? Check all that apply.

- (1) Financial planning services
- (2) Portfolio management for individuals and/or small businesses



(3) Portfolio management for investment companies

(4) Portfolio management for businesses or institutional clients (other than investment companies)

(5) Pension consulting services



(6) Selection of other advisers

(7) Publication of periodicals or newsletters

(8) Security ratings or pricing services

(9) Market timing services

(10) Other (specify):

Do not check Item 5.G(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940.

H. If you provide financial planning services, to how many clients did you provide these services during your last fiscal year?



0



1-10



11-25



26-50



51-100



101-250



251-500



More than 500

If more than 500, how many? (round to the nearest 500)

I. If you participate in a wrap fee program, do you (check all that apply):



(1) sponsor the wrap fee program?



(2) act as a portfolio manager for the wrap fee program?

If you are a portfolio manager for a wrap fee program, list the names of the programs and their sponsors in Section 5.I(2) of Schedule D.

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check either Item 5.I(1) or 5.I(2).

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Item 6 Other Business Activities

In this Item, we request information about your other business activities.

A. You are actively engaged in business as a (check all that apply):



(1) Broker-dealer



(2) Registered representative of a broker-dealer

- (3) Futures commission merchant, commodity pool operator, or commodity trading advisor
- (4) Real estate broker, dealer, or agent
- (5) Insurance broker or agent
- (6) Bank (including a separately identifiable department or division of a bank)
- (7) Other financial product salesperson (specify):

YES NO

B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? YES NO

(2) If yes, is this other business your primary business? YES NO

If "yes," describe this other business on Section 6.B. of Schedule D.

YES NO

(3) Do you sell products or provide services other than investment advice to your advisory clients? YES NO

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Item 7 Financial Industry Affiliations

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

Item 7 requires you to provide information about you and your *related persons*. Your *related persons* are all of your *advisory affiliates* and any *related person* that is under common control with you.

A. You have a *related person* that is a (check all that apply):

- (1) broker-dealer, municipal securities dealer, or government securities broker or dealer

- (2) investment company (including mutual funds)
- (3) other investment adviser (including financial planners)
- (4) futures commission merchant, commodity pool operator, or commodity trading advisor
- (5) banking or thrift institution
- (6) accountant or accounting firm
- (7) lawyer or law firm
- (8) insurance company or agency
- (9) pension consultant
- (10) real estate broker or dealer
- (11) sponsor or syndicator of limited partnerships

If you checked Items 7.A.(1) or (3), you must list on all your
 related persons that are investment advisers, broker-dealers, municipal securities dealers, or
 government securities broker or dealers.

Yes No

B. Are you or any related person a general partner in an investment-related limited partnership or manager of an investment-related limited liability company, or do you advise any other "private fund" as defined under SEC rule 203(b)(3)-1?

If "yes," for each limited partnership or limited liability company, or (if applicable) private fund, complete *_____*. If, however, you are an SEC-registered adviser and you have related persons that are SEC-registered advisers who are the general partners of limited partnerships or the managers of limited liability companies, you do not have to complete *_____* with respect to those related advisers' limited partnerships or limited liability companies.

To use this alternative procedure, you must state in the *_____*
 : (1) that you have related SEC-registered investment advisers that manage limited partnerships or limited liability companies that are not listed in *_____*
 ; (2) that complete and accurate information about those limited partnerships or limited liability companies is available in *_____* of the Form ADVs of your related SEC-registered advisers; and (3) whether your clients are solicited to invest in any of those limited partnerships or limited liability companies.

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Item 8 Participation or Interest in Client Transactions

In this Item, we request information about your participation and interest in your *clients'* transactions. Like Item 7, this information identifies areas in which conflicts of interest may occur between you and your *clients*.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*.

Proprietary Interest in Client Transactions

- A. Do you or any *related person*:
- | | Yes | No |
|---|-----------------------|----------------------------------|
| (1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A(1) or (2))? | <input type="radio"/> | <input checked="" type="radio"/> |

Sales Interest in *Client* Transactions

- B. Do you or any *related person*:
- | | Yes | No |
|--|-----------------------|----------------------------------|
| (1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) recommend purchase of securities to advisory <i>clients</i> for which you or any <i>related person</i> serves as underwriter, general or managing partner, or purchaser representative? | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)? | <input type="radio"/> | <input checked="" type="radio"/> |

Investment or Brokerage Discretion

- C. Do you or any *related person* have *discretionary authority* to determine the:
- | | Yes | No |
|--|----------------------------------|----------------------------------|
| (1) securities to be bought or sold for a <i>client's</i> account? | <input checked="" type="radio"/> | <input type="radio"/> |
| (2) amount of securities to be bought or sold for a <i>client's</i> account? | <input checked="" type="radio"/> | <input type="radio"/> |
| (3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account? | <input type="radio"/> | <input checked="" type="radio"/> |
| (4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions? | <input checked="" type="radio"/> | <input type="radio"/> |
- D. Do you or any *related person* recommend brokers or dealers to *clients*? Yes No
- E. Do you or any *related person* receive research or other products or services other than execution from a broker-dealer or a third party in connection with *client* securities transactions? Yes No
- F. Do you or any *related person*, directly or indirectly, compensate any *person* for *client* referrals? Yes No

In responding to this Item 8.F., consider in your response all cash and non-cash compensation that you or a related person gave any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

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Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody* of *client* assets and about your

custodial practices.

- A. (1) Do you have *custody* of any advisory *clients*': Yes No
- (a) cash or bank accounts?
- (b) securities?

If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have *custody* solely because (i) you deduct your advisory fees directly from your *clients*' accounts, or (ii) a *related person* maintains *client* funds or securities as a qualified custodian but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)(2)-(d)(5)) from the *related person*.

- (2) If you checked "yes" to Item 9.A(1)(a) or (b), what is the amount of *client* funds and securities and total number of *clients* for which you have *custody*:

U.S. Dollar Amount	Total Number of Clients
(a)\$	(b)

If your *related person* serves as qualified custodian of *client* assets, do not include the amount of those assets and the number of those *clients* in your response to Item 9.A.(2). Instead, include that information in your response to Item 9.B.(2).

- B. (1) Do any of your *related persons* have *custody* of any of your advisory *clients*': Yes No
- (a) cash or bank accounts?
- (b) securities?

You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).

- (2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:

U.S. Dollar Amount	Total Number of Clients
(a)\$	(b)

- C. If you or your *related persons* have *custody* of *client* funds or securities, check all the following that apply:

- (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage.
- (2) An independent public accountant audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools.
- (3) An independent public accountant conducts an annual surprise examination of *client* funds and securities.
- (4) An independent public accountant prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for *client* funds and securities.

If you checked Item 9.C.(2), C.(3) or C.(4), list in _____ the accountants that are engaged to perform the audit or examination or prepare an internal control report.

- D. Do you or your *related persons* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*? Yes No
- (1) you act as a qualified custodian

(2) your *related persons* act as qualified custodians

If you checked "yes" to Item 9.D.(2), list in all your *related persons* that act as qualified custodians for your *clients* in connection with advisory services you provide to *clients* (you do not have to list broker-dealers already identified as qualified custodians in Section 7.A. of Schedule D).

E. If you are filing your annual updating amendment and you were subject to a surprise examination by an independent public accountant during your last fiscal year, provide the date (MM/YYYY) the examination commenced:

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Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you.

If you are submitting an initial application, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application, you must complete Schedule C.

Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies?

YES NO

If yes, complete Section 10 of Schedule D.

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Item 11 Disclosure Information

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

If you are registered or registering with the SEC, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A(1), 11.A(2), 11.B(1), 11.B(2), 11.D(4), and 11.H(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

For "yes" answers to the following questions, complete a Criminal Action DRP:

A. In the past ten years, have you or any *advisory affiliate*:

(1) been convicted of or plead guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any *felony*? YES NO

(2) been *charged* with any *felony*?

If you are registered or registering with the SEC, you may limit your response to Item 11.A(2) to charges that are currently pending.

B. In the past ten years, have you or any *advisory affiliate*:

- (1) been convicted of or plead guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a *misdemeanor* involving: investments or an *investment-related* business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?
- (2) been *charged* with a *misdemeanor* listed in 11.B(1)?

If you are registered or registering with the SEC, you may limit your response to Item 11.B(2) to charges that are currently pending.

For "yes" answers to the following questions, complete a Regulatory Action DRP:

C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: YES NO

- (1) *found* you or any *advisory affiliate* to have made a false statement or omission?
- (2) *found* you or any *advisory affiliate* to have been *involved* in a violation of SEC or CFTC regulations or statutes?
- (3) *found* you or any *advisory affiliate* to have been a cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?
- (4) entered an *order* against you or any *advisory affiliate* in connection with *investment-related* activity?
- (5) imposed a civil money penalty on you or any *advisory affiliate*, or *ordered* you or any *advisory affiliate* to cease and desist from any activity?

D. Has any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* :

- (1) ever *found* you or any *advisory affiliate* to have made a false statement or omission, or been dishonest, unfair, or unethical?
- (2) ever *found* you or any *advisory affiliate* to have been *involved* in a violation of *investment-related* regulations or statutes?
- (3) ever *found* you or any *advisory affiliate* to have been a cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?
- (4) in the past ten years, entered an *order* against you or any *advisory affiliate* in connection with an *investment-related* activity?
- (5) ever denied, suspended, or revoked your or any *advisory affiliate's* registration or license, or otherwise prevented you or any *advisory affiliate*, by *order*, from associating with an *investment-related* business or restricted your or any *advisory affiliate's* activity?

E. Has any *self-regulatory organization* or commodities exchange ever:

- (1) *found* you or any *advisory affiliate* to have made a false statement or omission?
- (2) *found* you or any *advisory affiliate* to have been *involved* in a violation of its rules (other than a violation designated as a "*minor rule violation*" under a plan

approved by the SEC)?

(3) *found you or any advisory affiliate* to have been the cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted?

(4) *disciplined you or any advisory affiliate* by expelling or suspending you or the *advisory affiliate* from membership, barring or suspending you or the *advisory affiliate* from association with other members, or otherwise restricting your or the *advisory affiliate's* activities?

F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any *advisory affiliate* ever been revoked or suspended?

G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

H. (1) Has any domestic or foreign court: YES NO

(a) in the past ten years, *enjoined* you or any *advisory affiliate* in connection with any *investment-related* activity?

(b) ever *found* that you or any *advisory affiliate* were *involved* in a violation of *investment-related* statutes or regulations?

(c) ever dismissed, pursuant to a settlement agreement, an *investment-related* civil action brought against you or any *advisory affiliate* by a state or foreign *financial regulatory authority*?

(2) Are you or any *advisory affiliate* now the subject of any civil *proceeding* that could result in a "yes" answer to any part of Item 11.H(1)?

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Item 12 Small Business

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC and you indicated in response to Item 5.F(2)(c) that you have assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- Control means the power to direct or cause the direction of the management or policies of a

person, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to control the other *person*.

- | | YES | NO |
|---|-----------------------|-----------------------|
| A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year? | <input type="radio"/> | <input type="radio"/> |
| <i>If "yes," you do not need to answer Items 12.B. and 12.C.</i> | | |
| B. Do you: | | |
| (1) <i>control</i> another investment adviser that had assets under management of \$25 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> |
| (2) <i>control</i> another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> |
| C. Are you: | | |
| (1) <i>controlled</i> by or under common <i>control</i> with another investment adviser that had assets under management of \$25 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> |
| (2) <i>controlled</i> by or under common <i>control</i> with another <i>person</i> (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year? | <input type="radio"/> | <input type="radio"/> |

FORM ADV UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

OMB: 3235-0049

Primary Business Name: SMITH WB FINANCIAL GROUP	IARD/CRD Number: 107543
Rev. 11/2010	

Part 2 Brochures

Brochures	No Information Filed
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FORM ADV UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

OMB: 3235-0049

Primary Business Name: SMITH WB FINANCIAL GROUP	IARD/CRD Number: 107543
Rev. 11/2010	

Form ADV, Schedule A
Direct Owners and Executive Officers

OFFICER

FORM ADV

OMB: 3235-0049

**UNIFORM APPLICATION FOR INVESTMENT ADVISER
REGISTRATION**

Primary Business Name: SMITH WB FINANCIAL GROUP

IARD/CRD Number: 107543

Rev. 11/2010

Form ADV, Schedule B**Indirect Owners**

1. Complete Schedule B only if you are submitting an initial application. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
 - (c) in the case of an owner that is a trust, the trust and each trustee; and
 - (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are:

C - 25% but less than 50%	E - 75% or more
D - 50% but less than 75%	F - Other (general partner, trustee, or elected manager)
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.

(c) Complete each column.

No Indirect Owner Information Filed

OMB: 3235-0049

FORM ADV UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION

Primary Business Name: SMITH WB FINANCIAL GROUP	IARD/CRD Number: 107543
Rev. 11/2010	

Form ADV, Schedule D

Section 1.B. Other Business Names

List your other business names and the jurisdictions in which you use them. You must complete a separate Schedule D for each business name.

No Information Filed

Section 1.F. Other Offices

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Page 1 for each location. If you are applying for registration, or are registered, only with the SEC, list only the largest five (in terms of numbers of *employees*).

No Information Filed

Section 1.I. World Wide Web Site Addresses

List your World Wide Web site addresses. You must complete a separate Schedule D for each World Wide Web site address.

World Wide Web Site Address: WWW.WBSMITHCOMPANIES.COM

Section 1.K. Locations of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D Page 1 for each location.

No Information Filed

Section 1.L. Registration with Foreign Financial Regulatory Authorities

List the name, in English, of each *foreign financial regulatory authority* and country with which you are registered. You must complete a separate Schedule D Page 2 for each *foreign financial regulatory authority* with whom you are registered.

No Information Filed

Section 2.A(7) Affiliated Adviser

If you are relying on the exemption in rule 203A-2(c) from the prohibition on registration because you *control*, are *controlled by*, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser (if any)

SEC Number of Registered Investment Adviser
801-

Section 2.A(8) Newly Formed Adviser

If you are relying on rule 203A-2(d), the newly formed adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:

- I am not registered or required to be registered with the SEC or a *state securities authority* and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
- I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

Section 2.A(9) Multi-State Adviser

If you are relying on rule 203A-2(e), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

- I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 30 or more states to register as an investment adviser with the securities authorities in those states.
- I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 25 states to register as an investment adviser with the securities authorities of those states.

If you are submitting your *annual updating amendment*, you must make this representation:

- Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 25 states to register as an investment adviser with the securities authorities in those states.

Section 2.A(11) SEC Exemptive Order

No Information Filed

Section 4 Successions

Complete the following information if you are succeeding to the business of a currently-registered investment adviser. If you acquired more than one firm in the succession you are reporting on this Form ADV, you must complete a separate Schedule D Page 3 for each acquired firm. See Part 1A Instruction 4.

No Information Filed

Section 5.I(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Page 3 for each *wrap fee program* for which you are a portfolio manager.

Name of *Wrap Fee Program*

LADENBERG ASSET MANAGEMENT PROGRAM

Name of *Sponsor*

LADENBERG THALMAN

Section 6.B. Description of Primary Business

Describe your primary business (not your investment advisory business):

FINANCIAL PLANNING AND INVESTMENT ADVISORY SERVICES/ WEALTH MANAGEMENT

SECTION 7.A. Affiliated Investment Advisers and Broker-Dealers

No Information Filed

Section 7.B. Limited Partnership Participation or Other Private Fund Participation

You must complete a separate Schedule D Page 4 for each limited partnership in which you or a *related person* is a general partner, each limited liability company for which you or a *related person* is a manager, and each other private fund that you advise.

No Information Filed

SECTION 9.C. Independent Public Accountant

No Information Filed

SECTION 9.D. Related Person Qualified Custodian

No Information Filed

Section 10 Control Persons

You must complete a separate Schedule D Page 4 for each *control person* not named in Item 1.A. or Schedules A, B, or C that directly or indirectly *controls* your management or policies.

No Information Filed

Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

FORM ADV
UNIFORM APPLICATION FOR INVESTMENT ADVISER
REGISTRATION

OMB: 3235-0049

Primary Business Name: SMITH WB FINANCIAL GROUP	IARD/CRD Number: 107543
Rev. 11/2010	

Form ADV, DRPs
CRIMINAL DISCLOSURE REPORTING PAGE (ADV) No Information Filed
REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV) No Information Filed
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV) No Information Filed

FORM ADV

OMB: 3235-0049

**UNIFORM APPLICATION FOR INVESTMENT ADVISER
REGISTRATION**

Primary Business Name: SMITH WB FINANCIAL GROUP	IARD/CRD Number: 107543
Rev. 11/2010	

Form ADV, Signature Page

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial application for SEC registration and all amendments to registration.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a

notice filing.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having custody or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: WILLIAM B. SMITH	Date: MM/DD/YYYY 03/30/2011
Printed Name: WILLIAM B. SMITH	Title: OWNER
Adviser CRD Number: 107543	

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial application for SEC registration and all amendments to registration.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. *Non-Resident* Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to

maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having custody or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: _____ Date: MM/DD/YYYY

Printed Name: _____ Title: _____

Adviser CRD Number:
107543

State Registered Investment Adviser Execution Page

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial application for state registration and all amendments to registration.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the legally designated officers and their successors, of the state in which you maintain your *principal office and place of business* and any other state in which you are applying for registration or amending your registration, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order instituting proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, *administrative proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is founded, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are applying for registration or amending your registration.

2. State-Registered Investment Adviser Affidavit

If you are subject to state regulation, by signing this Form ADV, you represent that, you are in compliance with the registration requirements of the state in which you maintain your principal place of business and are in compliance with the bonding, capital, and recordkeeping requirements of that state.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment

adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature

Date MM/DD/YYYY

CRD Number

107543

Printed Name

Title

EXHIBIT 3

[REDACTED]
[REDACTED]
[REDACTED] MA [REDACTED]

September 29, 2003

William B. Smith, CFP
One Grafton Common, Suite 22
Grafton, MA 01519

Re: [REDACTED] Account # [REDACTED]

Dear Bill,

Please wire \$ 50,000 from the above referenced account to my bank account as follows:

Bank Name: [REDACTED]
Bank Location: [REDACTED] MASS
ABA / Routing #: [REDACTED]
Account Name: [REDACTED]
Account #: [REDACTED]

Sincerely [REDACTED]

(X) [Handwritten Signature]

EXHIBIT 4

[REDACTED] MA [REDACTED]

[Signature]

DATE: 1/27/03

ALDRIN
ORDER NO. *Rebecca Smith* \$ 50,000

Fifty Thousand

DOLLARS

Sovereign Bank
sovereignbank.com

MEMO

[REDACTED]

[REDACTED]

© 2002 BANK OF AMERICA

Rebecca Adams

INCREASING
SOVEREIGN

10/01/2003

MEMPHIS, TN 38103

UNITED STATES

EXHIBIT 5

[REDACTED] MA

October 21, 2003

Triad Advisors, Inc.
3500 Parkway Lane
Suite 220
Norcross, GA 30092

Re: [REDACTED]

Dear Sir or Madam:

Please wire \$50,000 from the above referenced account to my bank account as follows:

Bank Name: [REDACTED]
Bank Location: [REDACTED], MA
ABA/Routing #: [REDACTED]
Account Name: [REDACTED]
Account #: [REDACTED]

Thank you.

Sincerely,

[REDACTED]

[REDACTED]

[Handwritten Signature]

EXHIBIT 6

DATE 10-21-03

COMMONWEALTH NATIONAL \$ 50,000 ²⁵/₁₀₀

FIFTY THOUSAND & 00/100 DOLLARS

MA

AT THE ORDER OF

Fifty-thousand & 00/100

Sovereign Bank
www.sovereignbank.com

CD

© 2003 BANK OF AMERICA

deposit only

[Handwritten signature]

INCLER 115

10/22/2003

EXHIBIT 7

ASSET REVIEW

*William B. Smith, CFP
Registered Investment Advisor*

Please visit us on our website at www.wbsmithcompanies.com

Period Ending: 12/31/2008

[REDACTED] MA [REDACTED]

Company	Account #	Owner	Account Type	Value as of 12/31/2007	Value as of 12/31/2008
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
				<u>\$ [REDACTED]</u>	<u>\$ [REDACTED]</u>
Bank CD's	\$100,000.00			\$ 100,000.00	\$ 100,000.00
Total Assets				<u>\$ [REDACTED]</u>	<u>\$ [REDACTED]</u>

S & P 500 Index	-37.00%
Dow Index	-31.93%
Barclays/Lehman	5.24%
EAFE	-43.38%

*Securities Offered Through
Triad Advisors, Inc.
Member FINRA / SIPC*

This statement is provided as a courtesy. Please refer to your statement for precise values and activity.

ASSET REVIEW

*William B. Smith, CFP
Registered Investment Advisor*

Please visit us on our website at www.wbsmithcompanies.com

Period Ending: **6/30/2011**

[REDACTED] MA

Company	Account #	Owner	Account Type	Value as of 12/31/2010	Value as of 6/30/2011
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]
				\$ [REDACTED]	\$ [REDACTED]
Bank CD's		[REDACTED]	CDs	\$ 100,000.00	\$ 100,000.00
Total Assets				\$ [REDACTED]	\$ [REDACTED]

S & P 500 Index	6.02%
Dow Index	5.66%
Barclays US Aggr Bond Index	2.74%
EAFE Index	4.98%
Fed Funds Rate	0.25%

*Securities Offered Through
Triad Advisors, Inc.
Member FINRA / SIPC*

This statement is provided as a courtesy. Please refer to your statement for precise values and activity.

EXHIBIT 8

Retirement Income Evaluation

August 8, 2011

Prepared for:

[REDACTED]

Prepared by:

William B Smith Certified Financial Planner

TRIAD ADVISORS INC.

508-839-4465

email: wsmith@wbsmithcompanies.com

Plan # [REDACTED]

[REDACTED]

Personal Information Summary

The information below was used to calculate the results in this report.

1. Personal Information

[REDACTED]	
Current Age	[REDACTED]
Retirement Age	[REDACTED]
Plan to Age of	[REDACTED]
Tax Status	Single; Filing in MA; Local Tax 0%

2. Assets Included

Integrated Accounts	
[REDACTED]	
None	
Other Accounts and Assets	
Sue	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Bank CDs - OTHER TAXABLE ACCOUNT	\$100,000
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
Total Assets [REDACTED]	

Financial Events	
None	

3. Current/Most Recent Income (Pre-Tax)

[REDACTED]	
Annual Income	[REDACTED]

EXHIBIT 9

To: [REDACTED]
From: WB Smith

Re: loan

[REDACTED] please find the payment arrangement for the loan WBS Companies, Inc.

Enclosed: \$25,000

Payment schedule for remaining portion of the loan

Q2...\$25,000

Q3...\$25,000

Q4...\$25,000

To attest to the receipt and acceptance please sign below and return to my office @ 2
South Street, Grafton, Mass. 01519

I, [REDACTED] accept the enclosed check as partial payment on the loan to WB Smith
Companies, Inc. I hereby also confirm that this was a loan by us with full knowledge and
accept the noted payment schedule.

Signed this ____ day of _____, 2012

[REDACTED]



Commerce Bank

386 MAIN STREET
WORCESTER, MASSACHUSETTS 01608
01608

No. [REDACTED]

January 30, 2012

PAY TO THE ORDER OF

[REDACTED]

PAY EXACTLY

\$25,000 DOLLARS

\$ 25,000.00

[REDACTED]

NOTICE TO CUSTOMERS:
THE PURCHASE OF AN INDEMNITY BOND
MAY BE REQUIRED BEFORE ANY
OFFICIAL CASHIER'S CHECK OF THIS
BANK WILL BE REPLACED IN THE EVENT
IT IS LOST, MISPLACED, OR STOLEN.

AUTHORIZED SIGNATURE

Reserve Robinson

AUTHORIZED SIGNATURE

TREASURER'S CHECK

PAYABLE THROUGH THE BANK OF NEW YORK MELLON SEVERETT, MA

|| [REDACTED] || [REDACTED]

[REDACTED]

ENDORSE CHECK HERE

X

DO NOT WRITE / SIGN / STAMP BELOW THIS LINE

DEPOSITORY BANK ENDORSEMENT

EXHIBIT 10

Account Number [REDACTED]

Transaction ID Number (Broker Use Only) [REDACTED]

Premiere Select® IRA One-Time Distribution Request Form

Please read the attached Customer Instructions, Terms and Conditions before completing this form.

1 Account Information

Account Holder Name [REDACTED]

Address [REDACTED]

City [REDACTED] State MA Zip/Postal Code [REDACTED]

Phone Number [REDACTED]

Social Security Number/Taxpayer ID Number [REDACTED] Date of Birth [REDACTED]

2 Reason for Distribution - Choose One:

- Normal; I am at least 59½
- Premature; I am under the age of 59½ (includes distributions for qualified first-time home purchases, qualified higher education expenses, qualified HSA funding distributions, and substantially equal periodic payments.)
- Return of Excess Contributions(s)
- Rollover from an IRA to an employer-sponsored retirement plan (Do not use this form for an IRA trustee to trustee transfer.)
- Disability; I am disabled* and under the age of 59½
- Death Distribution
- * as defined in IRC Section 72(m)(7)

3 Distribution Instructions - Choose One. (DO NOT complete this section if you are requesting a Return of Excess Contribution; go to Section 4)

A. Partial Distribution in Cash Amount \$ [REDACTED] 2 5 0 1 5 . 0 0

Be sure to consider the effect of any fees due that are associated with the payment method selected in Section 5.

B. Partial Distribution In-Kind to my non-retirement brokerage account

Provide the security name(s) and share/unit amount(s) for the security position(s) to be distributed in-kind.

Investment Name	[REDACTED]	CUSIP or Symbol	[REDACTED]	# of Shares or All	[REDACTED]
Investment Name	[REDACTED]	CUSIP or Symbol	[REDACTED]	# of Shares or All	[REDACTED]
Investment Name	[REDACTED]	CUSIP or Symbol	[REDACTED]	# of Shares or All	[REDACTED]

C. Full Distribution (Please distribute my entire IRA balance.)

4 Return of Excess Contribution

Date on which excess contribution was made: [REDACTED] Tax year for which the excess contribution was made: [REDACTED]

I am requesting this return of excess contribution: Before my tax filing deadline After my tax filing deadline

Distribute the following excess contribution amount and attributable earnings, if any:

Principal amount \$ [REDACTED] + Earnings amount \$ [REDACTED] = Total (principal + earnings) \$ [REDACTED]

Of the total amount above, \$ [REDACTED] is to be distributed to me and \$ [REDACTED] is to be distributed and then redeposited as a current year contribution (cannot exceed your allowable current year contribution amount).

Account Number

[Redacted Account Number]

G. Direct Rollover to an employer-sponsored retirement plan (Do not use this form for an IRA trustee to trustee transfer.) Please provide complete payee and address information below.

Plan Name

C/O Plan Administrator Name

Street Address

City

State

Zip/Postal Code

6 Fidelity Fund Core Account Accrued Dividend Instructions

Applicable ONLY for full distributions and if you choose Payment Method B, C, or G in Section 5 above and payment is NOT being mailed via overnight mail.

Include my accrued dividend with the distribution check OR Pay my accrued dividend in a separate check as follows:

A. Same as distribution check B. Check to my mailing address of record C. Check paid and/or mailed to an alternate payee and/or address as follows:

Alternate Payee Name (if applicable)

Street Address

City

State

Zip/Postal Code

7 Withholding Election

Please carefully read the Notice of Withholding in the attached Customer Instructions, Terms and Conditions before completing this section. Your withholding election will apply to this distribution only.

Note: If you are not a U.S. person (including a U.S. resident alien) DO NOT complete this section.

Federal Income Tax Withholding - If you do not make an election below, federal income tax will be withheld from your IRA distribution (excluding Roth IRA distributions) at a rate of 10%.

I DO NOT want to have federal income tax withheld from my IRA distribution.

I want to have federal income tax withheld from my IRA distribution at the rate of [] [] [] % (insert whole percentage). If you select a percentage of less than 10%, we will withhold 10%.

State Income Tax Withholding - Do not complete this section if you are a resident of AK, FL, HI, MS, NH, NV, SD, TN, TX, WA, or WY.

I DO NOT want state income taxes withheld. (For residents of CA, NC, and OR, you must check this box if federal income taxes are being withheld and you do not want state income taxes withheld; for residents of DE you must check this box regardless of whether or not federal income taxes are being withheld if you do not want state income taxes withheld.)

I want to have state income taxes withheld from my IRA distribution in accordance with the minimum amount or percentage, if any, as determined by the requirements of my state of residence. Note: If your state does not provide a minimum amount or percentage for withholding and you do not provide a percentage below, state income taxes will not be withheld from your distribution.

I want to have [] [] [] % (insert whole percentage) withheld from my IRA distribution for state income taxes.

Note: If you elect to have state income taxes withheld from your IRA distribution in a percentage that is less than your state's minimum withholding requirements, your state's minimum amount or percentage will be withheld.

Account Number

[Redacted Account Number]

8 Signature -- Please check to make sure you have completed all appropriate sections of this form, then sign and date below.

I authorize and request National Financial Services LLC ("NFS") to make the above distribution from my Premiere Select IRA indicated above. I have carefully read, fully understand, and agree to comply with the Customer Instructions, Terms and Conditions, including the Notice of Withholding attached to this Premiere Select IRA One-Time Distribution Request Form.

I represent that, to the extent I have requested a distribution due to disability, I meet the meaning of disabled, as indicated in IRC Section 72(m)(7).

I hereby certify under penalties of perjury that if I am a U.S. person (including a U.S. resident alien) the number shown in Section 1 of this form is my correct taxpayer identification number (including a U.S. resident alien), I have attached IRS Form W-8BEN with this Premiere Select IRA One-Time Distribution Request Form with my U.S. taxpayer identification (or Social Security) number in order to claim tax treaty benefits.

I indemnify the National Financial Services LLC, its agents, successors, affiliates, and employees, from any liability in the event that I fail to meet the requirements of this form for a Traditional IRA, Rollover IRA, Roth IRA, SEP-IRA, SIMPLE IRA, IRA Beneficiary Distribution Account.

IRA Owner [Redacted Signature]

Date 6/17/11

OR Authorized Signator Signature [Redacted Signature]

Date

EXHIBIT 11

August 4, 2011

National Financial Services
Triad Advisors, Inc.
5185 Peachtree Parkway, Suite 280
Norcross, GA 30092

Letter of Instruction

Re: [REDACTED]

Please be advised that we, [REDACTED] would like \$25,000
withdrawn from our joint National Financial Account [REDACTED] and transferred to
[REDACTED]

If you have any questions, please contact my Financial Advisor, William B. Smith at 508-
839-4465.

Regards,

[REDACTED]
STAMP MEDALLION GUARANTEED STAMP
TRIAD ADVISORS, INC.
8/4/11
AUTHORIZED SIGNATURE
C9005000
ES TRANSFER AGENTS MEDALLION PROGRAM™

[REDACTED]
STAMP MEDALLION GUARANTEED STAMP
TRIAD ADVISORS, INC.
AUTHORIZED SIGNATURE
C9005000
ES TRANSFER AGENTS MEDALLION PROGRAM™