

WMKI Group LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of WMKI Group LLC. If you have any questions about the contents of this brochure, please contact us at (818) 804-1508 or by email at: william@wmkigroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about WMKI Group LLC is also available on the SEC's website at www.adviserinfo.sec.gov. WMKI Group LLC's CRD number is: 309832.

471 S. Gilpin St.
Denver, CO 80209
(818) 804-1508
william@wmkigroup.com
<https://www.wmkigroup.com>

Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 03/02/2023

Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment on 01/26/2022 of WMKI Group LLC. Material changes relate to WMKI Group, LLC's policies, practices or conflicts of interests.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business.....	2
Item 5: Fees and Compensation.....	3
Item 6: Performance-Based Fees and Side-By-Side Management.....	4
Item 7: Types of Clients.....	5
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	5
Item 9: Disciplinary Information.....	9
Item 10: Other Financial Industry Activities and Affiliations.....	9
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	9
Item 12: Brokerage Practices.....	10
Item 13: Review of Accounts.....	11
Item 14: Client Referrals and Other Compensation.....	12
Item 15: Custody.....	12
Item 16: Investment Discretion.....	13
Item 17: Voting Client Securities (Proxy Voting).....	13
Item 18: Financial Information.....	13
Item 19: Requirements For State Registered Advisers.....	14
ADV Part 2B.....	15

Item 4: Advisory Business

WMKI Group LLC (hereinafter "WMKI") is a Limited Liability Company organized in the State of Colorado. The firm was formed in June 2020, registered as an investment adviser in August 2020 and the managing member, chief compliance officer and principal owner is William Edward Knowles II.

Portfolio Management Services

WMKI offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WMKI creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Assessment of Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

WMKI evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. WMKI will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

WMKI seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of WMKI's economic, investment or other financial interests. To meet its fiduciary obligations, WMKI attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, WMKI's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is WMKI's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Services Limited to Specific Types of Investments

WMKI generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including exchange traded REITs), insurance products, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds and private placements. WMKI may use other securities as well to help diversify a portfolio when applicable.

We look closely at the needs associated with the individual capital. For example, a client could have lots of assets with a different advisor who is primarily passive. In this case, more targeted risk may be warranted. Conversely, a client with material risk in concentrated assets may be best suited for a fixed income focused portfolio. Any specific requirements or investment constructs will be considered prior to implementing a strategy.

WMKI will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by WMKI on behalf of the client. WMKI may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

WMKI has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 21,587,030.00	\$ 0.00	December 2022

Item 5: Fees and Compensation

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	1.25%

WMKI uses the value of the account as of the last business day of each month, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of WMKI's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract generally with 7 days' written notice.

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis, or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears. Please see item 15 below.

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by WMKI. Please see Item 12 of this brochure regarding broker-dealer/custodian.

WMKI collects its fees in arrears. It does not collect fees in advance.

Neither WMKI nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

WMKI manages accounts that are billed on performance-based fees (a share of capital gains on or capital appreciation of the assets of a client) and may as well manage accounts that are not billed on performance-based fees. Managing both kinds of accounts at the same time presents a conflict of interest because WMKI and/or its supervised persons have an incentive to favor accounts for which WMKI receives a performance-based fee. WMKI addresses the conflicts by ensuring that clients are not systematically advantaged or disadvantaged due to the presence or absence of performance-based fees. WMKI seeks best execution and upholds its fiduciary duty for all clients. Clients paying a performance-based fee should be aware that investment advisers have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes. This incentive creates a conflict of interest. WMKI will mitigate the conflict of interest by investing in accordance with each client's investment policy statement.

Qualified clients will pay a 10.00% performance fee based on capital appreciation. If the client's portfolio rises in value, the client will pay 10.00% on that increase in value, but if the portfolio drops in value, the client will not incur a new performance fee until the portfolio reaches the last highest value, adjusted for withdrawals and deposits, which is generally known as a "high water mark".

The high-water mark will be the highest value of the client's account on the last day of any previous month, after accounting for the client's deposits or withdrawals for each billing period.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement. This service may be canceled with 7 days' notice. Clients must pay the prorated performance-based fees for the billing period in which they terminate the Investment Advisory Contract up to and including the day of termination.

Performance-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis, or may be invoiced and billed directly to the client on a monthly basis. Clients may select the method in which they are billed. Fees are paid in arrears. Please see item 15 below.

Performance based fees can only be utilized by qualified clients meeting the following qualifications:

- (i) A natural person who, or a company that, immediately after entering into the contract has at least \$1,100,000 under the management of the investment adviser;
- (ii) A natural person who, or a company that, the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either: (a) Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,200,000 (excluding the value of the client's primary residence) at the time the contract is entered into; or (b) Is a qualified purchaser as defined in section 2(a)(51)(AA) of the Investment Company Act of 1940 (15U.S.C. 80a-2(51)(A)) at the time the contract is entered into; or
- (iii) A natural person who immediately prior to entering into the contract is: (a) An executive officer, director, trustee, general partner or person serving in similar capacity, of the investment adviser; or (b) An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.

Item 7: Types of Clients

WMKI generally provides advisory services to the following types of clients:

- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities

There is no account minimum for any of WMKI's services.

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

WMKI uses long term trading, short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

Methods of Analysis & Investment Strategies

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages. Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in

stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

WMKI's use of short sales, margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired. A client can lose more than they have invested while utilizing margins.

Options transactions involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. The risk for uncovered options are limitless.

Short sales entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

WMKI's use of short sales, margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have internal costs that lower investment returns and are disclosed in each funds prospectus. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF bought at a premium may ultimately be sold at a discount to its net asset value (NAV) (or indicative value in the case of

exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Exchange Traded Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be non-existent or illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain. Commodities futures could be used to diversify client portfolios and spread risk across various commodity groups.

Options are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a "naked" or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk and interest rate risk.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

There are no criminal, civil, administrative, or self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

Neither WMKI nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

Neither WMKI nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

William Edward Knowles II serves as the Chief Operating Officer of a privately held company. The business primarily invests in privately held automotive retail dealerships, but makes other investments as well. William Edward Knowles II receives no commissions from this position and only receive a base salary and bonus based on the annual performance of the business. He will not offer clients any services from this outside business activity. He spends approximately 30-40 hours a week on this outside business activity. It is William Edward Knowles II intention to reduce this time commitment in the future.

WMKI does not utilize nor select third-party investment advisers.

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

WMKI has a written Code of Ethics that covers the following areas:

- Prohibited Purchases and Sales
- Compliance Procedures
- Insider Trading
- Personal Securities Transactions
- Exempted Transactions
- Prohibited Activities

- Conflicts of Interest
- Gifts and Entertainment
- Confidentiality
- Service on a Board of Directors
- Compliance with Laws and Regulations
- Procedures and Reporting
- Certification of Compliance
- Reporting Violations
- Compliance Officer Duties
- Training and Education
- Recordkeeping
- Annual Review
- Sanctions

WMKI will mitigate conflicts of interest by (i) disclosing to the client any conflict of interest and (ii) always acting in the best interest of the client consistent with its fiduciary duty. ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE THIS CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK US AT ANY TIME.

WMKI does not recommend that clients buy or sell any security in which a related person to WMKI or WMKI has a material financial interest.

From time to time, representatives of WMKI may buy or sell securities for themselves at or around the same time they recommend those securities to clients. This may provide an opportunity for representatives of WMKI to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions create a conflict of interest. WMKI will always document any transactions that could be construed as conflicts of interest and will never engage in trading that front runs client trading activity or operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

Custodians/broker-dealers will be recommended based on WMKI's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and WMKI may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in WMKI's research efforts.

WMKI will require clients to use Interactive Brokers LLC.

1. Research and Other Soft-Dollar Benefits

While WMKI has no formal soft dollars program in which soft dollars are used to pay for third party services, WMKI may receive research, products, or other services from custodians in connection with client securities transactions (“soft dollar benefits”). WMKI may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and WMKI does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. WMKI benefits by not having to produce or pay for the research, products or services, and WMKI will have an incentive to recommend a custodian based on receiving research or services. This constitutes a conflict of interest; however, this conflict is mitigated because soft dollar benefits can help WMKI in its portfolio management and WMKI will always act in the best interest of its clients, including in connection with selecting a custodian to require clients to use. Clients should be aware that WMKI’s acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

WMKI receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

WMKI will require clients to use interactive brokers to custody accounts and to execute transactions. Not all advisers require clients to use a particular custodian.

If WMKI buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, WMKI would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. WMKI would determine the appropriate number of shares consistent with its duty to seek best execution.

Item 13: Review of Accounts

All client accounts for WMKI's advisory services provided on an ongoing basis are reviewed at least Quarterly by William Knowles, President, with regard to clients’ respective investment policies and risk tolerance levels. All accounts at WMKI are

assigned to this reviewer. At least annually William Knowles will meet with each client to review their account and assess their financial profile to ensure WMKI's management of the client account corresponds with the client's wishes.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client of WMKI's portfolio management services receives a monthly statement detailing the client's account, including assets held, asset value, and calculation of fees which will come from the custodian. WMKI will also provide at least monthly a separate written statement to the client including assets held, asset value, and calculation of fees deducted from the client account and paid to WMKI.

Item 14: Client Referrals and Other Compensation

Other than the soft dollar benefits disclosed in item 12 above, WMKI does not receive any economic benefit, directly or indirectly from any third party for advice rendered to WMKI's clients.

WMKI does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

WMKI does not have physical custody of client funds or securities. However, when advisory fees are deducted directly from client accounts at client's custodian, WMKI will be deemed to have limited custody of a client's assets. For fees deducted directly from client accounts, in states that require it, WMKI will:

- (A) Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (B) Utilize a custodian that sends at least monthly statements reflecting all additions and deductions, including the amount of advisory fees.
- (C) Send the qualified custodian written notice of the amount of the fee to be deducted and send the client a written invoice upon or prior to fee deduction itemizing the fee, including the formula used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

Clients will receive all account statements from the custodian and billing invoices from WMKI that are required in each jurisdiction, and they should carefully review those

statements and compare them to the invoices receives from WMKI for accuracy. Promptly notify WMKI or any discrepancies.

Item 16: Investment Discretion

WMKI provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. WMKI manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

Item 17: Voting Client Securities (Proxy Voting)

WMKI acknowledges its fiduciary obligation to vote proxies on behalf of those clients that have delegated to it, or for which it is deemed to have, proxy voting authority. WMKI will vote proxies on behalf of a client solely in the best interest of the relevant client and has established general guidelines for voting proxies. WMKI may also abstain from voting if, based on factors such as expense or difficulty of exercise, it determines that a client's interests are better served by abstaining. Further, because proxy proposals and individual company facts and circumstances may vary, WMKI may vote in a manner that is contrary to the general guidelines if it believes that doing so would be in a client's best interest to do so. If a proxy proposal presents a conflict of interest between WMKI and a client, then WMKI will disclose the conflict of interest to the client prior to the proxy vote and, if participating in the vote, will vote in accordance with the client's wishes.

Clients may obtain a complete copy of the proxy voting policies and procedures by contacting WMKI in writing and requesting such information. Each client may also request, by contacting WMKI in writing, information concerning the manner in which proxy votes have been cast with respect to portfolio securities held by the relevant client during the prior annual period.

Item 18: Financial Information

WMKI neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

Neither WMKI nor its management has any financial condition that is likely to reasonably impair WMKI's ability to meet contractual commitments to clients.

WMKI has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

WMKI currently has only one management person: William Edward Knowles II. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual. Please see item 10 above.

WMKI accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client.

Performance-Based Fees for Portfolio Management

WMKI receives performance based compensation from Qualified clients based on capital appreciation. Please see item 5 and 6 for more information.

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

Neither WMKI, nor its management persons, has any relationship or arrangement with issuers of securities.

This brochure supplement provides information about William Edward Knowles II that supplements the WMKI Group LLC brochure. You should have received a copy of that brochure. Please contact William Edward Knowles II if you did not receive WMKI Group LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about William Edward Knowles II is also available on the SEC's website at www.adviserinfo.sec.gov.

WMKI Group LLC

Form ADV Part 2B – Individual Disclosure Brochure

for

William Edward Knowles II

Personal CRD Number: 7269555

Investment Adviser Representative

WMKI Group LLC
471 S Gilpin ST
Denver, CO 80209
(818) 804-1508
william@wmkigroup.com

UPDATED: 03/02/2023

Item 2: Educational Background and Business Experience

Name: William Edward Knowles II **Born:** 1990

Educational Background and Professional Designations:

Education:

Masters Business Administration, Duke University - 2019

BA Economics, Claremont McKenna College - 2013

MA Finance, Claremont McKenna College - 2013

Designations:

CFA - Chartered Financial Analyst

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute - the largest global association of investment professionals.

There are currently more than 90,000 CFA charterholders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly

evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders-often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 22 countries and territories recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

Comprehensive and Current Knowledge

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit www.cfainstitute.org.

Business Background:

06/2020 - Present	Managing Member & Chief Compliance Officer WMKI Group LLC
02/2017 - Present	Chief Operating Officer Maroone USA
09/2013 - 02/2017	Investment Analyst BMGI
08/2009 - 06/2013	Student Claremont McKenna College

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

William Edward Knowles II serves as the Chief Operating Officer of a privately held company. The business primarily invests in privately held automotive retail dealerships, but makes other investments as well. William Edward Knowles II receives no commissions from this position and only receive a base salary and bonus based on the annual performance of the business. He will not offer clients any services from this outside business activity. He spends approximately 30-40 hours a week on this outside business activity. It is William Edward Knowles II intention to reduce this time commitment in the future.

Item 5: Additional Compensation

William Edward Knowles II does not receive any economic benefit from any person, company, or organization, other than WMKI Group LLC in exchange for providing clients advisory services through WMKI Group LLC.

Item 6: Supervision

As the Chief Compliance Officer of WMKI Group LLC, William Edward Knowles II supervises all activities of the firm. William Edward Knowles II's contact information is on the cover page of this disclosure document. William Edward Knowles II adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

Item 7: Requirements For State Registered Advisers

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment advisor representative's suitability.

William Edward Knowles II has NOT been involved in any award or being found liable in an arbitration claim. William Edward Knowles II has NOT been the subject of a bankruptcy.