

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Brochure prepared: February 29, 2016

Firm

**WB Advisors, LLC dba WB Wealth Management
("The Adviser")**

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This brochure provides information about the qualifications and business practices of WB Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (281) 214-0424. 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 WB Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

The term "registered investment adviser" does not imply a certain level of skill or training.

Item 2 Material Changes

General Item: Change of office address and telephone number on title page

Item 4 4.E Update of assets under management.

Item 14 Other compensation

Item 3 Table of Contents

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Item 4 Advisory Business

Advisory Business	
4.A	<p>WB Advisors, LLC is a Texas Limited Liability Company, registered with the Texas Secretary of State since December 22, 2010. The Adviser is fully owned by its single member, KC Hirai, LLC, and has one appointed manager, Albert K. Lu, who acts as President and Chief Compliance Officer. WB Advisors, LLC is owned and controlled, indirectly, by Albert K. Lu and Saroj Rout, each of whom own 48% of the parent company.</p> <p>WB Advisors, LLC also operates under the trade-name WB Wealth Management.</p>
4.B	<p>WB Advisors, LLC offers managed accounts on a discretionary basis to individuals, trusts, and businesses. The Adviser also offers hourly fee-based financial consulting and fixed-fee financial planning. The Adviser advises on a wide range of investment vehicles, which include, but are not limited to, equities, fixed-income investments, precious metals, and options. The Adviser does not advise on legal, tax or accounting matters.</p>
4.C	<p>WB Advisors, LLC offers a wide array of services and strategies to meet each client's individual requirements. Fee-based financial counseling is offered for clients seeking financial expertise without discretionary management. For those seeking the continuous supervision of a managed account, the Adviser offers discretionary managed accounts within four broad wealth management strategies:</p> <ol style="list-style-type: none"> 1. Preservation 2. Income 3. Diversified Growth 4. Aggressive (non-diversified) Growth
4.D	Not applicable
4.E	<p>Assets managed as of February 29, 2016</p> <p>Discretionary \$1,495,584</p> <p>Non-discretionary \$752,284</p>

Item 5 Fees and Compensation

Fees and Compensation	
5.A	<p>Hourly fees for individual financial counseling are \$225 per hour.</p> <p>Fixed-fees for financial planning vary according to financial complexity, typically ranging from \$2500 to \$5,000.</p> <p>Fees on managed accounts range from 0.85% to 1.25% of assets under management per year. Management fees are deducted from client accounts on a quarterly basis at the beginning of each quarter. At the start of the management agreement, the Adviser will charge a pro-rated fee for the initial quarter. Upon termination of the agreement, the Adviser will automatically return any collected fees for the quarter, pro-rata, to the client.</p> <p>All fees and fee payment terms are subject to negotiation.</p>
5.B	<p>Hourly consulting fee payments are required up front, prior to engagement. Fixed-fee consulting arrangements require 50% of the fee to be paid in advance with the balance due on delivery of the report. Management fees on discretionary accounts are due in advance and are deducted quarterly from the client's account as described in Item 5.A above.</p>
5.C	<p>The Adviser fee schedule does not enumerate any fees apart from those directly relating to investment management. Additional fees, including those arising from brokerage and custodial services, mutual fund expenses, bank services, margin interest, wire transfers, and regulatory compliance, may apply.</p> <p>Clients and prospective clients may reference Page 15 for detailed information regarding brokerage services.</p>
5.D	<p>Pre-paid fees for hourly consulting and fixed-fee financial planning are non-refundable. Unused pre-paid fees on managed accounts are automatically refunded upon written termination of the management agreement.</p>
5.E.1	<p>WB Advisors, LLC maintains an affiliation with KC Hirai, LLC dba The Woodlands Bullion Company, a precious-metals dealer, through common ownership. This ownership structure represents a conflict of interest when the Adviser's investment recommendations are executed through its affiliated dealer, KC Hirai, LLC. Specifically, the company and its ownership may profit by recommending gold, silver, or platinum products to clients when those recommendations are executed through the affiliated dealer.</p> <p>All representatives of The Adviser are bound by the company's Code of Ethics which requires them to always act in the client's best interest. To mitigate the potential or appearance of abuse, The Adviser has implemented the following specific procedures:</p> <ul style="list-style-type: none"> • Training: All representatives with trading authority or access to material client information must understand and abide by a strict Code of Ethics;

	<ul style="list-style-type: none"> • Disclosure: The relationship between The Adviser and its affiliated dealer is disclosed in the brochure and the advisory contract; • Choice: In transactions involving precious metals, clients may specify the use of a non-affiliated dealer. <p>The treatment of these and other potential conflicts of interest are discussed in the Adviser's Code of Ethics, which is available to the client by request.</p>
5.E.2	In transactions involving precious metals, clients may opt to make purchases through a (non-affiliated) dealer of their choice. The dealer selection is left solely to the client's discretion. When investment strategies dictate the use of precious metal dealers or custodians (or sub-custodians), clients must specify their preferences in writing. Although clients may elect to purchase and/or sell precious metals through KC Hirai, LLC, they are not required or recommended to do so and if so desired, this election must be explicit and in writing.
5.E.3	Under some circumstances, the fees resulting from commissions or markups may comprise 50% or more of the revenue earned from advisory clients. A hypothetical example of such a circumstance is a client who, after receiving a one-hour advisory consultation with the Adviser, executes a large transaction through the related dealer.
5.E.4	Any commissions or markups earned on purchases and sales of precious metals are independent from advisory fees and vice versa; neither firm offers offsetting fee discounts to clients of the other.

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

Performance-Based Fees and Side-By-Side Management

Not applicable

Item 7 Types of Clients

Types of Clients

WB Advisors, LLC provides investment advice primarily to individuals and trusts. An account minimum opening balance of \$250,000 applies for all managed accounts. The Adviser may grant a waiver under special circumstances, such as in the case of direct family members who maintain separate individual accounts with an aggregate balance exceeding the minimum requirement. Fixed-fee financial planning services are available only to clients holding managed accounts with the Adviser.

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

Methods of Analysis, Investment Strategies and Risk of Loss	
8.A	<p>WB Advisors, LLC seeks long-term success for its clients through careful consideration of relevant factors such as the client's:</p> <ul style="list-style-type: none"> • financial objectives • risk tolerance • specific risk factors, such as job security, debt levels, and other personal factors • investment experience <p>In selecting specific investments, WB Advisors, LLC may employ the following methods of analysis and strategies:</p> <ol style="list-style-type: none"> 1. Micro-economic analysis: <ol style="list-style-type: none"> a. Study of individual behavior b. Study of Supply, Demand, and Prices 2. Macro-economic analysis <ol style="list-style-type: none"> a. Business cycle theory – concerning the recurrence of periods of expansion and contraction in an economy. b. Monetary theory - concerning exchange ratios involving money and the sources and consequences of inflation and deflation. c. Theory of Interest – concerning the time market and its impact on capital structures. 3. Fundamental securities analysis <ol style="list-style-type: none"> a. Analysis of securities through study of the issuing company's financial statements, primarily its income statement and balance sheet. b. Attempts to define objective criteria for the selection of investment securities by identifying quantitative factors of securities analysis such as intrinsic value and margin of safety. 4. Buy & Hold <ol style="list-style-type: none"> a. Attempts to minimize trading and tax expenses through the avoidance of frequent-trading when advantageous. <p><i>Regardless of strategy, investing in securities involves risk of loss.</i></p>
8.B	<p>Economic theories, both micro and macro, are deductive in nature and are not subject to empirical validation as are other common areas of science such as physics or chemistry. Furthermore, the presence of manifold causal factors creates difficulty when attempting to predict specific outcomes through the application of a general theory.</p>

	<p>Fundamental securities analysis attempts to predict future conditions (prices) through the study of current and historical data, a practice which is not always reliable.</p> <p>The effectiveness of the Buy & Hold strategy is strongly influenced by broker fee schedules and prevailing tax laws. Its use cannot ensure the minimization of taxes or fees.</p> <p style="text-align: center;">All investment strategies involve risk.</p>	
8.C	<p>As part of a managed portfolio, the Adviser may recommend equity security investments that carry numerous risk factors. These factors include:</p> <ul style="list-style-type: none"> • Market risk – the risk that the market, as a whole, will lose value. • Non-systematic business risk – the risk that a particular stock will lose value due to factors specific to the issue, such as management or business sector. • Interest rate risk – the risk that a change in interest rates may negatively affect the present value of a stock. • Currency risk – the risk that the dollar-value of a foreign issue will drop due to currency exchange fluctuations. • Regulatory and taxation risk – the risk that government action will negatively affect the value of a stock. <p>The Adviser may also recommend fixed-income securities, such as government and corporate bond issues. These securities carry risk factors, including:</p> <ul style="list-style-type: none"> • Credit/default risk – the risk that the issuer will default on its obligation to pay principal or interest. • Currency risk – the risk that the dollar-value of a foreign issue will drop due to currency exchange fluctuations. • Purchasing-power risk – the risk that inflation will reduce the real value of future cash flows. • Interest rate / Call risk – the risk that rising interest rates will reduce the present market value of the security or the risk that falling interest rates will cause the issuer to call the bond, if permitted. • Event risk – the risk that a change in ownership, such as a leveraged buyout, may reduce the present market value of the security. <p>The Adviser may recommend precious metals, particularly gold, silver, and platinum, and other commodity investments to clients as instruments of diversification or speculative gain. Commodity investments carry risk factors, including:</p> <ul style="list-style-type: none"> • Volatility risk – commodity investments often exhibit high price volatility and hence carry significant risk. • Interest rate risk – the risk that a change in interest rates may negatively affect the value of a commodity asset. • Regulatory and taxation risk – the risk that government action will 	

	negatively affect the value of a commodity asset.	
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Item 9 Disciplinary Information

Not applicable

Item 10 Other Financial Industry Activities and Affiliations

Not applicable

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

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	
11.A	Not applicable
11.B	Not applicable
11.C	<p>WB Advisors, LLC and its Investment Advisor Representatives may buy or sell securities or other assets identical to those recommended to clients provided the transaction occurs simultaneously with or after client trades. When executing simultaneous orders through block trades, all participants must receive the same price.</p> <p>In general, the internal policies of WB Advisors, LLC (Code of Ethics) explicitly forbid any use of client trading information for personal gain via personal trading or other means.</p> <p>Clients and prospects may receive a copy of the Adviser's Code of Ethics by written request.</p>
11.D	<p>Any personal trading by related persons of securities bought or sold for clients must be approved by the Adviser's Chief Compliance Officer. If permitted, any personal trading must adhere to the conditions in Item 11.C and the internal Code of Ethics.</p>

Item 12 Brokerage Practices

Brokerage Practices	
12.A.1(a)	<p>WB Advisors, LLC does not select broker-dealers for client transactions.</p> <p>The Adviser does, however, recommend Shareholders Services Group (a securities broker) for its client accounts based on numerous factors, including cost, reputation, independence, and suitability. In assessing the reasonableness of broker-dealer compensation, the Adviser will primarily consider the relative compensation of other broker-dealers offering similar levels of service. WB Advisors, LLC is independently owned and operated and receives no cash benefit from any third-party in connection with investment decisions affecting client accounts.</p> <p>The Adviser may receive and employ research material (both proprietary and third-party) and infrastructure-related tools and resources as part of its standard relationship with a broker or custodian, provided the use of these services is deemed beneficial to its clients. If received, these services constitute a “soft dollar benefit” since the Adviser receives a benefit (i.e. services) it has not paid for.</p>
12.A.1(b)	The receipt of soft dollar benefits creates a conflict of interest since it provides an incentive to recommend a broker-dealer based on factors other than the client’s best interest in receiving most favorable execution.
12.A.1(c)	The Adviser’s recommendation may be based, in part, on the benefit of supplementary products and services beyond those relating to cost and quality of order execution. Hence, commissions paid by the client may be higher than those available through other providers.
12.A.1(d)	Any soft dollar benefits received will be applied so as to benefit all clients to the best of the Adviser’s ability.
12.A.1(e)	Not applicable
12.A.1(f)	Not applicable
12.A.2	The Adviser does not receive client referrals as part of its broker-dealer relationship.
12.A.3(a)	<p>WB Advisors, LLC does not select broker-dealers for client transactions. Hence, clients must specify a directed brokerage through which the Adviser will execute transactions on their behalf as part of the written advisory agreement.</p> <p>As a general practice, the Adviser recommends the use of Shareholders Services Group, a securities broker. WB Advisors, LLC is independently owned and operated and maintains no affiliation with the recommended broker.</p> <p>The practice of directed brokerage is not required by all registered advisers. In a directed brokerage arrangement, the authority to negotiate commissions rests</p>

	solely with the client. This arrangement may result in less favorable execution of client transactions.
12.A.3(b)	Not applicable
12.B	The Adviser aims to aggregate orders whenever practical to minimize costs except when doing so would be unfavorable to clients.

Item 13 Review of Accounts

Review of Accounts	
13.A	<p>The Adviser reviews all investment recommendations on a monthly basis or at more frequent intervals when triggered by material changes in market conditions.</p> <p>The Adviser reviews managed accounts on a quarterly, semi-annual, or annual schedule. The frequency of reviews is determined by the Adviser and is based on factors such as account size, investment strategy, and market conditions. The Adviser will provide the client with an account review schedule at the outset of account and whenever changes to the schedule occur. The Adviser will review financial plans on a schedule determined by the client.</p> <p>The Adviser president and compliance officer, Albert K. Lu, is solely responsible for the review of all investment recommendations and managed account positions.</p>
13.B	<p>Accounts are reviewed periodically. However market conditions, such as excessive volatility, may trigger more frequent account reviews if deemed necessary by the Adviser.</p>
13.C	<p>Adviser will provide the client with an annual account statement, which includes a summary of realized gains, dividends, interest, and management fees. The Client will also receive quarterly statements from the custodian stating account positions, portfolio value, and transaction history for the covered period. The client may request the report at more frequent intervals. In this case, a nominal administrative fee will apply.</p> <p>Managed account holders may request an in-person or telephone annual review with their client service representative.</p>

Item 14 Client Referrals and Other Compensation

Client Referrals and Other Compensation	
14.A	KC Hirai, LLC may receive compensation for referrals to financial newsletter publications including, but limited to, publications by Henry Madison Research. These publications are recommended as a source of information only, not financial advice, and are presented in a general context, not with regards to any specific financial situation.
14.B	Not applicable

Item 15 Custody

Custody

15	Clients with managed accounts will receive periodic account statements from the broker-dealer or qualified custodian. These statements contain important information regarding the status of the account and fee charges. Clients are urged to carefully examine any statements and compare those statements with statements provided by the Adviser for accuracy.
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Item 16 Investment Discretion

Investment Discretion

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The Adviser manages accounts on a discretionary basis through the execution of a limited power of attorney. Under this agreement, the Adviser may decide which securities or other assets are bought and sold for the client's account and in what quantity. The agreement also authorizes the custodian to deduct quarterly management fees and send duplicate account statements and trade confirmations to the Adviser.

The agreement does not allow the Adviser to:

- Possess client funds, securities, or investment assets
- Withdraw client funds, securities, or assets
- Gain access or ownership of client funds, securities, or assets

The client may further restrict the Adviser's authority through written instruction.

Item 17 Voting Client Securities

Voting Client Securities	
17.A	Not applicable
17.B	The Adviser does not accept authority to vote client securities. The Adviser, custodian, or transfer agent will deliver proxy or solicitation material to the client. The Adviser does not advise on issues relating to securities voting or solicitations including class action shareholder suites.

Item 18 Financial Information

Financial Information

Not Applicable

Item 19 Requirements for State-Registered Advisers

Requirements for State-Registered Advisers	
19.A	<p>Albert K. Lu – President & Chief Compliance Officer</p> <p>Born: 1969</p> <p>Education: McGill University, M. Eng. 1994, B. Eng (Honours) 1992</p> <p>Business Background:</p> <p>President & Chief Compliance Officer, WB Advisors, LLC since 2010</p> <p>Principal Member, The Woodlands Bullion Company since 2005</p> <p>Employment History:</p> <p>Design Engineer, Silicon Laboratories, Inc. 1999-2005</p> <p>Design Engineer, Analog Devices, Inc. 1995-1999</p>
19.B	<p>Refer to Form ADV Part 2B Items 4.A and 4.B for other business activities of the supervised person Albert K. Lu</p> <p>Business Activities for Related Persons</p> <p>Saroj Rout (CRD # 5883670)</p> <p>Mixignal Innovations LLC 6 New Castle Drive, Nashua NH 03063 Business: IC Design Consulting (non-investment business) Sole Member since 04/2009 24 hours /month (trading hours)</p> <p>Tufts University 161 College Ave, Medford MA 02155 Business: Education (non-investment business) Ph.D. Candidate since 01/2007 16 hours/month (trading and non-trading hours)</p> <p>KC Hirai LLC 21 Waterway Ave. # 300, The Woodlands , TX 77380 Business: Precious Metal Dealer (Investment business) Member and Director of Operation since 06/2009 2 hours/month (trading hours)</p>
19.C	Not applicable
19.D	Not applicable
19.E	Not applicable

