

Item 1 - Cover Page



West Wealth Group, LLC
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westwealthgroup.com

This Brochure provides information about the qualifications and business practices of West Wealth Group, LLC (“West Wealth Group”, “us”, “we”, “our”). If you have any questions about the contents of this Brochure, please contact us at (949) 682-9105 or via email at natalie@westwealthgroup.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about West Wealth Group is also available via the SEC’s website www.adviserinfo.sec.gov. You can search this site by using a unique identifying number, known as a CRD number. The CRD number for West Wealth Group is 316644. The SEC’s web site also provides information about any persons affiliated with West Wealth Group who are registered, or are required to be registered, as Investment Adviser Representatives of West Wealth Group.

West Wealth Group is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information that you may use to determine whether to hire or retain them.

Item 2 - Material Changes

Material changes made throughout the Form ADV Part 2A are listed below:

Item 4 Advisory Services

- Financial planning is included at no additional cost for clients that participate in our Asset Management Services.
- We offer structured notes and private investment vehicles to clients if appropriate based on their risk tolerance and other investment information.
- We now provide sub-advisory services and tax loss harvesting as described under “551p Sub-Advisory Services.”
- We now provide payment of tax preparation and pay for the preparation of certain legal documents as described under “Tax Preparation and Certain Legal Services”. This is only for certain clients with more than \$2,000,000 in assets overseen by West Wealth Group.

Item 5 Fees and Compensation

- Financial planning is included at no additional cost for clients that participate in our Asset Management Services.
- Custodial and Trading Fees are listed.

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

- Although not suitable for all clients, we do offer private investment vehicles and structured notes for some clients. Risks specific to these investment types are included.

Item 12 Brokerage Practices

- We do not participate in soft dollars but do receive economic and non-economic benefits from our custodian, TD Ameritrade. These are outlined in Item 12.
- We do not permit directed brokerage and do not receive client referrals from the qualified custodian we recommend.

Item 14 Client Referrals and Other Compensation

- We offer a \$50 donation to a charity of the client’s choice for new client referrals, whether or not the referral becomes a client.
- We participate in an advertising and referral program with Dave Ramsey’s SmartVestor program. Details are provided.

Item 15 Custody

- We are deemed to have custody of client accounts due to a client’s ability to have a standing letter of authorization allowing wire transfers to other third-parties. Additional details are provided.

To request a complete copy of our Form ADV Part 2A Brochure at any time, without charge, contact natalie@westwealthgroup.com or your financial professional.

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Item 4 – Advisory Business Introduction

Our Advisory Business

West Wealth Group, LLC, DBA BML Wealth Management, and DBA Ensemble Wealth Management (“West Wealth Group”, “us”, “we”, “our”) is a registered investment adviser with the Securities and Exchange Commission (“SEC”). The Adviser was founded in 2021 by the principal owners Brian Levy and Michael Clark, CFP®.

Services

West Wealth Group offers asset management and financial planning services, with an emphasis on building portfolios designed to meet the needs of our clients. Our focus is on helping you develop and execute plans that are designed to build and preserve your wealth. We are available during normal business hours either by telephone, email, or in person by appointment to answer your questions.

Asset Management Services

As part of the active asset management process we will meet with you to discuss your financial circumstances, investment goals and objectives, and to determine your risk tolerance. We will ask you to provide statements summarizing current investments, income and other earnings, recent tax returns, retirement plan information, other assets and liabilities, wills and trusts, insurance policies, and other pertinent information.

Based on the information you share with us, we will analyze your situation and tailor a portfolio with appropriate asset allocations and investment strategies utilizing models developed by Third-Party Asset Managers, which include but are not necessarily limited to Blackrock Investment Management, LLC. Our recommendations and ongoing management are based upon your investment goals, objectives and risk tolerance. We will monitor the account, trade as necessary, and communicate regularly with you.

We will work with you on an ongoing basis to evaluate your asset allocation as well as rebalance your portfolio to keep it in line with your goals as necessary. We will be reasonably available to help you with questions about your account.

Please note that pursuant to the investment advisory agreement you are obligated to notify us promptly when your financial situation, goals, objectives, or needs change.

You shall have the ability to impose reasonable restrictions on the management of your account, including the ability to instruct us not to purchase certain mutual funds, stocks or other securities. These restrictions may be a specific company security, industry sector, asset class, or any other restriction you request. We have the right to refuse your restrictions if we feel they are too burdensome to adequately manage your account.

We typically recommend investments in mutual funds and exchange-traded funds (“ETFs”) but if other investment types meet your investment objectives and risk tolerance, we could also recommend investments in individual stocks and bonds, other fixed income investments, alternative asset classes or investments, real estate investment trusts (REITs), private equity investments, fixed and variable annuities,

and structured products. If you currently own these or other investment types, we will review them during our initial meetings with you and will take them into account during the implementation of your selected investment strategy.

Under certain conditions, securities from outside accounts may be transferred into your advisory account; however, we may recommend that you sell any security if we believe that it is not suitable for the current recommended investment strategy. Additionally, trading may be required to meet initial allocation targets, after substantial cash deposits that require investment allocation, and/or after a request for a withdrawal that requires liquidation of a position.

Periodically, your account may need to be rebalanced or reallocated in order to reestablish the targeted percentages of your initial asset allocation. This rebalancing or reallocation will occur as required or pursuant to the schedule we have determined together.

You will be responsible for all tax consequences resulting from the sale of any security, rebalancing or reallocation of the account. You are responsible for any taxable events in these instances. We are not tax professionals and do not give tax advice. However, at your request we will work with your tax professionals to assist you with tax planning.

You will be notified of any purchases or sales through trade confirmations and statements that are provided by the custodian. These statements list the total value of the account, itemize all transaction activity, and list the types, amounts, and total value of securities held. You will at all times maintain full and complete ownership rights to all assets held in your account, including the right to withdraw securities or cash, proxy voting and receiving transaction confirmations.

Model Portfolios

We subscribe to the trading signals for the following models developed by a Third-Party Asset Manager. A description of these models may be found in the ADV Part 2A for the Third-Party Asset Manager.

- Target Allocation ESG ETF
- Target Allocation Smart Beta ETF
- Target Allocation with SMAs
- Target Allocation with SMAs Muni
- Target Allocation ETF Multi-Manager
- Target Allocation ETF Multi-Manager
- Long Horizon ETF
- Long Horizon Mutual Fund
- Target Income ETF
- Target Income

55ip Sub-Advisory Services

West Wealth Group has entered into a sub-advisory agreement with 55I, LLC ("55ip") to provide certain sub-advisory services to our clients. These services include providing access to 55ip's proprietary online platform and to certain BlackRock model portfolios comprised of mutual fund and exchange-traded fund products, tax-efficient strategy recommendations and trading for tax-loss harvesting and tax transition for certain non-qualified accounts, and trade execution for certain mutual fund and exchange-traded fund products.

There is no additional fee charged to you for the use of these services by 55ip or by West Wealth Group. To provide these services at no additional charge to you, we must maintain a certain amount of assets invested in BlackRock mutual funds and ETFs. This creates a conflict of interest because we may recommend BlackRock products that are not in your best interest in an effort to maintain receipt of these services at no cost. In all cases, however, we strive to recommend only products and services that we believe are in your best interest.

All qualified and non-qualified accounts must be at least \$50,000 in managed market value on the day of account opening. Managed market value includes all non-restricted positions and cash.

Eligible Securities for 55ip Sub-Advisory Services include cash, daily traded mutual funds, exchange-traded funds and stocks. Accounts sub-advised by 55ip will be rebalanced and reviewed for tax loss harvesting opportunities according to the schedule provided by the model provider. New account submissions are generally traded the next business day on a best-efforts basis.

Accounts subscribed to investment models that include mutual funds may be subject to short-term redemption fees imposed by custodians and/or the mutual fund sponsor. Neither 55ip nor West Wealth Group are responsible for these short-term redemption fees. They will be the responsibility of the client.

We may have access to certain models offered by BlackRock without the use of their 55ip Sub-Advisory Services.

Financial Planning

Financial planning is included at no additional cost for clients that participate in our Asset Management Services.

Fee based financial planning is a comprehensive relationship which incorporates many different aspects of your financial status into an overall plan that meets your goals and objectives. The financial planning relationship consists of face-to-face or virtual meetings and ad hoc meetings with you and/or your other advisors (attorneys, accountants, etc.) as necessary.

In performing financial planning services, we typically examine and analyze your overall financial situation, which may include issues such as taxes, insurance needs, overall debt, credit, business planning, retirement savings and reviewing your current investment program. Our services may focus on all or only one of these areas depending upon the scope of our engagement with you.

It is essential that you provide the information and documentation we request regarding your income, investments, taxes, insurance, estate plan, etc. We will discuss your investment objectives, needs and goals, but you are obligated to inform us of any changes. We do not verify any information obtained from you, your attorney, accountant or other professionals.

If you engage us to perform these services, you will receive a written agreement detailing the services, fees, terms and conditions of the relationship. You will also receive this Brochure. You are under no obligation to implement recommendations through us. You may implement your financial plan through any financial organization of your choice.

We obtain information from a wide variety of publicly available sources. We do not have any inside private information about any investments that are recommended. All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations. Choosing which advice to follow is your decision.

If you decide to implement our recommendations, we will help you open a custodial account(s). The funds in your account will generally be held in a separate account, in your name, at an independent custodian, and not with us. We recommend using TD Ameritrade.

ERISA Fiduciary

Both parties acknowledge that if the Account is subject to the Employee Retirement Income Security Act of 1974, as amended (ERISA), the following provisions will apply:

- The Adviser acknowledges that it is a “fiduciary” with respect to the Client as that term is defined under Section 3(21)(A) of ERISA.
- The person signing this Agreement on behalf of the Client acknowledges its status as a “named fiduciary” with respect to the control and management of the assets held in the Account, and agrees to notify the Adviser promptly of any change in the identity of the named fiduciary with respect to the Account;
- The Adviser agrees to obtain and maintain an ERISA bond satisfying the requirements of Section 412 of ERISA and include The Adviser and its members, agents and employees among those insured under that bond unless provided by the Plan.

When delivering ERISA fiduciary services, we will perform those services for the retirement plan as a fiduciary and will act in good faith and with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. In our capacity as a 3(21) plan fiduciary, we will conduct research to determine appropriate investment selections and allocations and to project potential ranges of returns and market values over various time periods and using various cash flows to assist the plan sponsor in determining the appropriate model(s) investment(s) for the retirement plan.

Under this arrangement the Adviser is appointed by the plan sponsor or trustee to determine a recommended lineup of investments to be included in the Plan. These recommendations are presented to the Plan Sponsor, who has the ultimate responsibility to accept or reject the recommendation. The Adviser will not have any further responsibility to communicate instructions to any third-party, including

the custodian, and/or third-party administrator. The Adviser will/will not communicate directly with the recordkeeper regarding administrative and recordkeeping matters arising under the Adviser's investment advisory agreement with the Plan Sponsor, or more generally about the recordkeeper's services to the *Plan*.

The Adviser offers the following 3(21) services:

- Plan design and asset selection consultation
- Review plan sponsor's stated financial criteria for each investment option
- Quarterly portfolio statements, rate of return reports, asset allocation statements
- Provide investment research and performance information on investment options
- Investment option replacement guidance
- Personal consultations with the plan sponsor as necessary
- Develop Plan Investment Committee Charter, as needed
- Fiduciary due diligence assistance
- Attendance at Plan Committee and other meetings
- Annual Fiduciary Plan Review
- Fiduciary education services to Plan Committee
- Participant education, guidance, and enrollment
- Vendor coordination assistance
- Benchmarking services

The Adviser will conduct research to determine appropriate investment selections and allocations and to project potential ranges of returns and market values over various time periods and using various cash flows to assist the Plan Sponsor in determining the appropriate investment options for the retirement plan.

The data used to select the investment options is based on estimated, forward-looking performance of various asset classes and subclasses to create our forward-looking capital markets assumptions (e.g., expected return, expected standard deviation, correlation, etc.). Past performance and the return estimates of the asset classes and the indices that correspond to these asset classes may not be representative of actual future performance. Actual results could differ, based on various factors including the expenses associated with the management of the portfolio, the portfolio's securities versus the securities comprising the various indices and general market conditions. Before a specific investment is selected, other factors such as economic trends, which may influence the choice of investments and risk tolerance, should be considered. The Adviser has the responsibility and authority to recommend the investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced. The Plan Sponsor has the responsibility and authority to make the final decision regarding what investments to include and when to add or exclude a specific security.

The Client confirms that any instructions that have been given to the Adviser with regard to the Account are consistent with the governing plan documents and investment policy statements of the plan.

Except as otherwise provided under ERISA the Adviser shall not be liable for any error of judgment or mistake of law or for any loss suffered by the Client in connection with the matters to which this Agreement relates except a loss resulting from the Adviser's breach of its fiduciary duty, negligence, misconduct or bad faith.

The Adviser is not (i) the "administrator" of the Plan as defined in § 3(16)(A) of ERISA or (ii) the "plan administrator" of the Plan as defined in Section 414(g) of the Internal Revenue Code of 1986, as amended (the "Code"). The Adviser is neither a law firm nor a public accounting firm and Adviser will not provide legal or accounting advice.

The Client acknowledges that the services covered by this Agreement are consultative, and give no investment authority ("discretion") or responsibility to the Adviser over any assets of the Plan or Participant regardless of how and where the assets are held. Throughout the term of this Agreement, the Plan or Participant retains full discretion to supervise, manage and direct the assets that may be held with any affiliated or unaffiliated third-party.

The Adviser encourages plan sponsors to consult with other professional advisors since we do not provide tax or legal advice that may affect asset classes or allocations. The Adviser will apply any guidelines the client supplies, as directed, however, compliance with these restrictions or guidelines, is the client's responsibility.

Discretionary 3(38) Fiduciary Services

When a client engages the Adviser to perform "3(38) Fiduciary Services", the Adviser acts as an "investment manager" (as defined in Section 3(38) of ERISA) with respect to the performance of discretionary fiduciary investment services. Under this arrangement the Adviser is appointed by the Plan Sponsor or trustee and accepts discretion over plan assets and assumes full responsibility and liability for fiduciary functions concerning decisions related to the plan assets.

Under this arrangement the Adviser is appointed by the plan sponsor or trustee and accepts discretion over plan assets and assumes full responsibility and liability for fiduciary functions concerning decisions related to the plan assets. The Adviser will review the investment options available to the Plan through documents provided by the Plan Sponsor and notifies the Plan's record-keeper and/or the Plan Sponsor the Adviser's instructions to add, remove and/or replace these specific investment options offered to Plan participants and/or used for administrative purposes under the Plan, according to the criteria set forth in guidelines selected by the Plan Sponsor. The Plan Sponsor retains all authority, responsibility and decision-making for investment options not available on the Plan record-keeper's platform (i.e., "non-core" investment options, such as employer stock, plan loans, self-directed brokerage accounts, frozen guaranteed investment contracts, and life insurance).

The Adviser will retain final decision-making authority with respect to removing and/or replacing investments in the core lineup. The Plan Sponsor will not have responsibility to communicate instructions to any third-party, custodian and/or third-party administrator.

The data used to determine the investment options is based on estimated, forward-looking performance of various asset classes and subclasses to create our forward-looking capital markets assumptions (e.g., expected return, expected standard deviation, correlation, etc.). Past performance and the return estimates of the asset classes and the indexes that correspond to these asset classes may not be representative of actual future performance. Actual results could differ, based on various factors including the expenses associated with the management of the portfolio, the portfolio's securities versus the securities comprising the various indexes and general market conditions. Before a specific investment is selected, other factors such as economic trends, which may influence the choice of investments and risk tolerance, should be considered. The Adviser has the responsibility and authority to determine the investment line up including evaluating investment managers and mutual fund companies, individual mutual funds, and money market funds which may be retained or replaced.

The Adviser will also monitor the current managed investment line up including the investment's performance compared to an applicable benchmark. If the Adviser determines that a fund no longer meets the criteria, they will select alternatives and replace them.

Educational Seminars

We shall hold educational seminars and webinars covering a broad range of investment-related topics. There is no additional fee for this service.

Tax Preparation and Certain Legal Services

We may choose to offer certain tax preparation and/or trusts and estate planning document preparation services to clients that have at least \$2,000,000 in assets that we oversee. We will establish maximum amounts for the preparation of taxes and/or the trust and estate planning document preparation per client per year and these will be outlined in your agreement with West Wealth Group. These services will be provided by an unaffiliated CPA or law firm and will be invoiced to us directly. This creates a conflict of interest even though we do not share in the preparation fees charged by the CPA or law firm because it encourages clients to increase their assets with our firm. It does not increase the amount of fees we charge you.

Wrap Fee

The Adviser does not sponsor or participate in a third-party sponsored wrap fee program.

Assets Under Management

As of December 31, 2021, we had \$318,111,578 in discretionary assets under management. We do not have any non-discretionary assets under management. .

Item 5 – Fees and Compensation

Asset Management Fee Schedule

West Wealth Group does not impose a minimum account balance for the opening of an account with the Adviser. The fee charged is based upon the amount of money invested and shall range between 0.75% and 1.5% of assets under management. Multiple accounts of immediately-related family members, at the same mailing address, may be considered one consolidated account for billing purposes. Fees are charged

monthly, in advance. Fees will be assessed on the last day of each month, based on the average daily balance for the preceding month.

The fees shown above are annual fees and may be negotiable based upon certain circumstances. No increase in the annual fee shall be effective without prior written notification. West Wealth Group believes the advisory fee is reasonable considering the fees charged by other investment advisers offering similar services/programs.

If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances.

You may terminate the portfolio management agreement upon written or verbal notice to West Wealth Group or your financial professional. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees. In the event the Agreement is terminated, and the Client has advanced any fees which have been unearned as of the date of termination, such unearned fees shall be refunded to the Client. Any fees that are due, but have not been paid, will be billed to the Client and are due immediately.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

Retirement Plan Services Fees

We charge a negotiable asset-based fee that ranges between 0.25% to 1.5% of assets under management for either Discretionary 3(38) Fiduciary Services or Non-Discretionary 3(21) Fiduciary Services programs (the "Programs"). Advisory fees for the plan are paid to us by the plan, or directly from the plan sponsor, or in some cases a combination of both. These fees are generally collected by the plan record keeper or vendor and paid directly to our firm. This fee includes services as an ERISA section 3(21) or 3(38) fiduciary with respect to client's plan.

West Wealth Group's advisory agreement with each plan sponsor outlines the timing of fees collected and the process of fee remittal to our firm.

You may also incur fees related to your use of outside service providers including third-party administrators and record keepers. The fee schedule for each outside service provider varies dramatically from service provider to service provider. The service provider's fees will also vary from plan to plan as each plan's structure and characteristics are different from the next.

We believe our services help plan sponsors and plan fiduciaries meet their fiduciary duty to the plan and its

participants. As a part of our services, we review the fees of service providers and the transparency of their fees. We will assist the plan sponsors with a review of service providers including the third-party administrator, daily record keeper, and custodian to ensure that their services, along with ours, remain competitive to alternatives that are available.

Automatic Payment of Fees

The Client agrees to authorize the Custodian to pay directly to West Wealth Group upon receipt of notice, the Account’s investment advisory services fee. Fee withdrawals will occur no more frequently than monthly from the Client’s Account, unless specifically instructed otherwise by the Client.

The Custodian will send to the Client a statement, at least quarterly, indicating all amounts disbursed from the Account, including the fee paid directly to West Wealth Group. West Wealth Group's access to the Assets of the Account will be limited to trading and the withdrawals authorized above.

Custodial and Trading Fees

Custodians typically impose certain brokerage commissions and transaction fees in addition to other miscellaneous account fees. Some securities incur no commissions or transaction fees, such as U.S. Exchange-Listed Stocks and ETFs and No Transaction Fee (NTF) mutual funds. These fees are charged by the custodian and not shared with West Wealth Group or its financial professionals.

The more common fees are listed below but you should refer to the TD Ameritrade Institutional Maximum Fees, Commissions and Limits document you will receive upon account opening for additional fees and charges.

Trading Commissions – Equities (Market and Limit Orders)

Online trades for U.S. Exchange-Listed Stocks & ETFs	\$0.00
Online trades for OTC Equities	\$6.95
Offline – Broker-Assisted trades	\$25.00

Trading Commissions – Mutual Funds

No Transaction Fee (NTF) mutual funds	No commission
Transaction Fee Funds online	\$31.00
Transaction Fee Funds offline – Broker-Assisted	\$45.00
Omnibus Pricing (NTF and Transaction Fee Funds)	\$25.00
Load Funds	See prospectus

Short-Term Redemption Fee – Mutual Funds

Shares held 90 days or less	\$49.99*
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*This fee is in addition to any fund-imposed fees in the fund’s prospectus

Fixed Income Commission Schedule

Treasuries at Auction	No Charge
UITs	\$35.00

Third-Party Fees

Our fees do not include brokerage commissions, transaction fees, and other related costs and expenses. You may incur certain charges imposed by custodians, third-party investment companies and other third parties. These include fees charged by managers, custodial fees, deferred sales charges, odd-lot

differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds, money market funds and exchange-traded funds (ETFs) also charge internal management fees, which are disclosed in the fund’s prospectus. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Certain strategies offered by us may involve investment in mutual funds and/or ETFs. Load and no load mutual funds may pay annual distribution charges, sometimes referred to as “12(b)(1) fees”. These 12(b)(1) fees come from fund assets, and thus indirectly from clients’ assets. We do not receive any compensation from these fees. All of these fees are in addition to the management fee you pay us. You should review all fees charged to fully understand the total amount of fees you will pay. Services similar to those offered by us may be available elsewhere for more or less than the amounts we charge. Our brokerage practices are discussed in more detail under Item 12 – Brokerage Practices.

Other Compensation

Our IARs may recommend and sell Life Insurance, Medicare Supplements, Fixed Index Annuities, Fixed Annuities, Long Term Care Insurance and Individual and Group Health Insurance. They will receive the usual and customary commissions in addition to any agreed upon advisory fee.

Michael Clark is a licensed real estate salesperson and the owner of Ensemble Realty Group. As such, he may receive normal and customary fees associated with real estate transactions in his independent capacity. These services are separate from investment advisory services offered through West Wealth Group and are governed by a separate agreement. Recommending such services in our advisory capacity presents a conflict of interest because of the compensation that Mr. Clark may receive. However, Clients are under no obligation, contractually or otherwise, to purchase real estate services through Mr. Clark or Ensemble Realty Group.

While our IARs endeavor at all times to put the interest of our clients first as part of our fiduciary duty, the possibility of receiving commissions creates a conflict of interest, and may affect their judgment when making recommendations. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that Clients may purchase recommended insurance products from other insurance agents not affiliated with us.

Financial Planning and Consulting Fees

Financial planning is included at no additional cost for clients that participate in our Asset Management Services.

The following fee schedule applies for financial planning and consulting services:

Service	Fee
Hourly Consulting	Negotiable Fee Up To \$500 Per Hour
Financial Planning	Negotiable Fee Between \$2,500 and \$20,000

An estimate for total hours will be determined at the start of the advisory relationship. Fees for West

Wealth Group 's comprehensive financial planning services are negotiable depending upon the nature and complexity of the client's circumstances. A deposit of 50% of the fee is due at the time the agreement is signed. The remainder of the fee is due upon presentation of an investment plan or the rendering of consulting services. Investment plans will be presented to you within 90 days of the contract date, provided that all information needed to prepare the investment plan has been promptly provided to us. We do not accept prepayment of more than \$1,200 in fees per client, six months or more in advance. The financial planning agreement will terminate once you receive the final plan. The Financial Planning and Consulting Agreement will show the fee(s) you will pay.

If the plan is implemented through us, we will receive compensation from the sale of insurance products or advisory services recommended in the financial plan. This compensation would be in addition to the financial planning fee you pay. The fees and expenses you pay for the purchase of these products may be more or less than the expenses you would pay should you decide to implement our recommendations through another investment advisory firm or broker-dealer and are typically determined by the broker-dealer or investment company sponsoring the product. Therefore, a conflict of interest may exist between our interests and your interests since we can recommend products that pay us compensation. We have an incentive to recommend particular products based upon the potential compensation rather than your needs. This potential conflict is addressed in our Code of Ethics.

Based upon your needs, we can also provide consultations throughout the year to advise and counsel you about other financial issues. We can help you with transition planning, major transaction analysis, coordinated with cash flow needs, retirement needs, estate planning needs, income tax planning, life and disability insurance needs, investment needs, and college education planning.

All recommendations developed by us are based upon our professional judgment. We cannot guarantee the results of any of our recommendations.

Item 6 – Performance Based Fee and Side by Side Management

We do not charge any performance-based fees. These are fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7 – Types of Clients

We provide investment advisory services to individuals, high-net-worth individuals, trusts, estates, charitable organizations, small businesses. We have no minimum account opening balance.

Additionally, the Adviser provides investment advisory services to the following types of retirement plans:

- Tax-qualified retirement plans (both defined benefit and defined contribution) that are intended to receive favorable tax-treatment under section 401(a) or 403(b) of the IRC
- Non-qualified executive deferred compensation plans
- 401(k)s, IRAs and IRA rollovers
- Other Types of Retirement plans may be introduced to the programs.

All qualified and non-qualified accounts in the 55ip sub-adviser program must be at least \$50,000 in managed market value on the day of account opening. Managed market value includes all non-restricted positions and cash.

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

Methods of Analysis

We use Fundamental Analysis, Modern Portfolio Theory, Technical Analysis, Asset Allocation, and Cyclical Analysis as part of our overall investment management discipline; the implementation of these analyses as part of our investment advisory services to you may include any, all or a combination of the following:

Fundamental Analysis

Fundamental analysis is a technique that attempts to determine a security's value by focusing on the underlying factors that affect a company's actual business and its future prospects. Fundamental analysis is about using real data to evaluate a security's value. It refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements.

The end goal of performing fundamental analysis is to produce a value that we can compare with the security's current price, with the aim of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short).

Modern Portfolio Theory

We also use Modern Portfolio Theory to help select the investments we use in your account.

Modern Portfolio Theory tries to understand the market as a whole, rather than looking for what makes each investment opportunity unique. Investments are described statistically, in terms of their expected long-term return rate and their expected short-term volatility. The volatility is equated with "risk," measuring how much worse than average an investment's bad years are likely to be. The end goal is to identify your acceptable level of risk tolerance, and then to find a portfolio with the maximum expected return for that level of risk.

Technical Analysis

Technical Analysis is a technique that attempts to determine a security's value by developing models and trading rules based upon price and volume transformation. Technical analysis assumes that a market's price reflects all relevant information so the analysis focuses on the history of a security's trading behavior rather than external drivers such as economic, fundamental and news events. The practice of technical analysis incorporates the importance of understanding how market participants perceive and act upon relevant information rather than focusing on the information itself. Ultimately, technical analysts develop trading models and rules by evaluating factors such as market trends, market participant behaviors, supply and demand and pricing patterns and correlations.

As with other types of analysis, the predictive nature of technical analysis can vary greatly; models and rules are often modified and updated as new patterns and behaviors develop. Past performance is not an indicator of future return.

Targeted Asset Allocation

We combine relevant analyses to determine asset allocation strategies. Ten targeted asset allocation model portfolios covering everything from conservative income to very aggressive growth oriented approaches have been compiled by us. We will assign you a targeted portfolio that meets your goals and time horizon, while addressing the level of risk you are comfortable assuming. The strategic model portfolio allocation remains constant; your specific portfolio model may change infrequently to reflect shifts in your risk tolerance and goals. We screen and select funds and securities to be added to or removed from the model portfolio on a regular basis. Rebalancing can occur after a move in the market of 15% or more within any year but at least once per year based on the annual review of your financial situation.

Cyclical Analysis

While we do not attempt to time the market, we may use cyclical analysis in conjunction with other strategies to help determine if shifts are required in your investment strategies depending upon long and short-term trends in financial markets and the performance of the overall national and global economy.

Investment Strategies

In order to perform this analysis, we use many resources, such as:

- Blackrock
- Custodian and Third-Party Research
- Annual reports, prospectuses, filings
- Company press releases and websites

The investment strategies we use to implement any investment advice given to you include, but are not limited to:

- Long term purchases -securities held at least a year
- Short term purchases - securities sold within a year
- Trading -securities sold within 30 days
- Short sales
- Margin Transactions

Risk of Loss

We cannot guarantee our analysis methods will yield a return. In fact, a loss of principal is always a risk. Investing in securities involves a risk of loss that you should be prepared to bear. You need to understand that investment decisions made for your account by us are subject to various market, currency, economic, political and business risks. The investment decisions we make for you will not always be profitable nor can we guarantee any level of performance.

A list of all risks associated with the strategies, products and methodology we offer are listed below:

Bond Fund Risk

Bond funds generally have higher risks than money market funds, largely because they typically

pursue strategies aimed at producing higher yields of the risks associated with bond funds include:

- Call Risk - The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high-yielding bond before the bond's maturity date.
- Credit Risk — the possibility that companies or other issuers whose bonds are owned by the fund may fail to pay their debts (including the debt owed to holders of their bonds). Credit risk is less of a factor for bond funds that invest in insured bonds or U.S. Treasury bonds. By contrast, those that invest in the bonds of companies with poor credit ratings generally will be subject to higher risk.
- Interest Rate Risk — the risk that the market value of the bonds will go down when interest rates go up. Because of this, you can lose money in any bond fund, including those that invest only in insured bonds or Treasury bonds.
- Prepayment Risk — the chance that a bond will be paid off early. For example, if interest rates fall, a bond issuer may decide to pay off (or "retire") its debt and issue new bonds that pay a lower rate. When this happens, the fund may not be able to reinvest the proceeds in an investment with as high a return or yield.

Fundamental Analysis Risk

Fundamental analysis, when used in isolation, has a number of risks:

- There are an infinite number of factors that can affect the earnings of a company, and its stock price, over time. These can include economic, political and social factors, in addition to the various company statistics.
- The data used may be out of date.
- It is difficult to give appropriate weightings to the factors.
- It assumes that the analyst is competent.
- It ignores the influence of random events such as oil spills, product defects being exposed, and acts of God and so on.

Modern Portfolio Theory Risk

Modern Portfolio Theory tries to understand the market as a whole and measure market risk in an attempt to reduce the inherent risks of investing in the market. However, with every financial investment strategy there is a risk of a loss of principal. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

Cyclical Analysis Risk

Looking at market cycles in conjunction with other investment strategies can be useful when making investment decisions. However, market cycles are not always predictable. Each financial investment strategy has benefits and risks. Not every investment decision will be profitable, and there can be no guarantee of any level of performance.

Exchange-Traded Funds ("ETF") Risk

Most ETFs are passively managed investment companies whose shares are purchased and sold on a securities exchange. An ETF represents a portfolio of securities designed to track a particular market segment or index. ETFs are subject to the following risks that do not apply to conventional funds:

- The market price of the ETF's shares may trade at a premium or a discount to their net asset value;
- An active trading market for an ETF's shares may not develop or be maintained; and
- There is no assurance that the requirements of the exchange necessary to maintain the listing of an ETF will continue to be met or remain unchanged

Insurance Product Risk

The rate of return on variable insurance products is not stable, but varies with the stock, bond and money market subaccounts that you choose as investment options. There is no guarantee that you will earn any return on your investment and there is a risk that you will lose money. Before you consider purchasing a variable product, make sure you fully understand all of its terms. Carefully read the prospectus. Some of the major risks include:

- **Liquidity and Early Withdrawal Risk** – There may be a surrender charges for withdrawals within a specified period, which can be as long as six to eight years. Any withdrawals before a client reaches the age of 59 ½ are generally subject to a 10 percent income tax penalty in addition to any gain being taxed as ordinary income.
- **Sales and Surrender Charges** – Asset-based sales charges or surrender charges. These charges normally decline and eventually are eliminated the longer you hold your shares. For example, a surrender charge could start at 7 percent in the first year and decline by 1 percent per year until it reaches zero.
- **Fees and Expenses** – There are a variety of fees and expenses which can reach 2% and more such as:
 - Mortality and expense risk charges
 - Administrative fees
 - Underlying fund expenses
 - Charges for any special features or riders.
- **Bonus Credits** – Some products offer bonus credits that can add a specified percentage to the amount invested ranging from 1 percent to 5 percent for each premium payment. Bonus credits, however, are usually not free. In order to fund them, insurance companies typically impose high mortality and expense charges and lengthy surrender charge periods.
- **Guarantees** – Insurance companies provide a number of specific guarantees. For example, they may guarantee a death benefit or an annuity payout option that can provide income for life. These guarantees are only as good as the insurance company that gives them.
- **Market Risk** – The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** – The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Mutual Funds Risk

The following is a list of some general risks associated with investing in mutual funds.

- **Country Risk** - The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.
- **Currency Risk** -The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.
- **Income Risk** - The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.
- **Industry Risk** - The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.
- **Inflation Risk** - The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.
- **Manager Risk** -The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.
- **Market Risk** -The possibility that stock fund or bond fund prices overall will decline over short or even extended periods. Stock and bond markets tend to move in cycles, with periods when prices rise and other periods when prices fall.
- **Principal Risk** -The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Private Investments Risk

Private investments may be introduced to a limited number of clients for whom the Adviser reasonably believes the investment is appropriate given the client's net worth, investable assets, current portfolio composition, investment objectives, liquidity needs, and risk considerations. Through our due diligence process, we will identify appropriate private investment vehicles for a client's review and consideration. These investments generally involve additional material risks, including liquidity constraints and a lack of transparency, especially with the various fees.

Stock Fund Risk

Overall "market risk" poses the greatest potential danger for investors in stocks funds. Stock prices can fluctuate for a broad range of reasons, such as the overall strength of the economy or demand for particular products or services.

Structured Notes Risk

A structured note is a financial instrument that combines two elements, a debt security and exposure to an underlying asset or assets. It is essentially a note, carrying counter party risk of the issuer. The return on the note is linked to the return of an underlying asset or assets which makes the structured product unique. The payout can be used to provide some degree of principal protection, leveraged returns (there is usually a cap on the maximum return you receive) and it is tailored to a specific market or economic view. If certain underlying conditions are met, investors may receive long-term capital gains tax treatment if the note is held for more than one year. Structured notes often have liquidity constraints

and they can be far riskier than they may appear. It is important you review the upside and downside potential, and the underlying fees, in detail and ask your financial professional any questions you may have.

Technical Analysis Risk

- Technical analysis is derived from the study of market participant behavior and its efficacy is a matter of controversy.
- Methods vary greatly and can be highly subjective; different technical analysts can sometimes make contradictory predictions from the same data.
- Models and rules can incur sufficiently high transaction costs.

Overall Risks

Clients need to remember that past performance is no guarantee of future results. All funds carry some level of risk. You may lose some or all of the money you invest, including your principal, because the securities held by a fund goes up and down in value. Dividend or interest payments may also fluctuate, or stop completely, as market conditions change.

Before you invest, be sure to read a fund's prospectus and shareholder reports to learn about its investment strategy and the potential risks. Funds with higher rates of return may take risks that are beyond your comfort level and are inconsistent with your financial goals.

While past performance does not necessarily predict future returns, it can tell you how volatile (or stable) a fund has been over a period of time. Generally, the more volatile a fund, the higher the investment risk. If you need your money to meet a financial goal in the near-term, you probably can't afford the risk of investing in a fund with a volatile history because you will not have enough time to ride out any declines in the stock market.

Item 9 – Disciplinary Information

Registered Investment Advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or the integrity of our management. We do not have any information to disclose concerning West Wealth Group or any of our IARs. We adhere to high ethical standards for all IARs and associates.

Item 10 – Other Financial Industry Activities and Affiliations

Neither West Wealth Group nor any of its management persons are registered as a broker-dealer or registered as a representative of a broker-dealer, nor does it have any pending application to register. In addition, neither West Wealth Group nor its management persons are affiliated with any broker-dealer.

West Wealth Group and its management persons are not registering as a commodity pool operator, futures commission merchant, or commodity trading advisor.

Other Financial Industry Affiliations

All IARs of West Wealth Group can recommend and sell Life Insurance, Medicare Supplements, Fixed Index Annuities, Fixed Annuities, Long Term Care Insurance and Individual and Group Health Insurance. They can also, as independent insurance agents, sell those recommended insurance products to clients. Insurance Products are sold through BML Wealth & Insurance Services. BML Wealth & Insurance services is owned by Brian M. Levy. This creates a conflict of interest as the insurance licensed IARs earn insurance commissions for the sale of those products, which creates an incentive to recommend such products. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that clients may purchase recommended insurance products from other insurance agents not affiliated with us or BML Wealth & Insurance Services.

All IARs of West Wealth Group are dually registered as investment adviser representatives of Cooper Financial Group, DBA Cooper McManus. All IARs spend 50% of their time in their role at Cooper McManus. While a significant portion of their time is spent in their duties at Cooper McManus, they will take all steps necessary to ensure that this activity does not impede their ability to perform their duties at West Wealth Group, and to ensure that their fiduciary duties to clients of both firms are respected. Any material conflict of interest arising from this relationship shall be communicated to the client prior to making any recommendation. Our Code of Ethics requires that all IARs do what is in our clients' best interest at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not any additional compensation they receive from other sources. Michael Clark is a licensed real estate salesperson and the owner of Ensemble Realty Group. As such, he will receive normal and customary fees associated with real estate transactions in his independent capacity. These services are separate from investment advisory services offered through West Wealth Group and are governed by a separate agreement. Recommending such services in our advisory capacity presents a conflict of interest because of the compensation that Mr. Clark may receive. However, Clients are under no obligation, contractually or otherwise, to purchase real estate services through Mr. Clark or Ensemble Realty Group. Also, we require IARs to disclose that clients may purchase recommended real estate services from other real estate agents not affiliated with us.

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

General Information

We have adopted a Code of Ethics for all IAR's of the firm describing its high standards of business conduct, and fiduciary duty to you, our client. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures. All of our IAR's must acknowledge the terms of the Code of Ethics annually, or as amended.

Participation or Interest in Client Accounts

Our Compliance policies and procedures prohibit anyone associated with West Wealth Group from having an interest in a client account or participating in the profits of a client's account without the approval of

the CCO.

The following acts are prohibited:

- Employing any device, scheme or artifice to defraud
- Making any untrue statement of a material fact
- Omitting to state a material fact necessary in order to make a statement, in light of the circumstances under which it is made, not misleading
- Engaging in any fraudulent or deceitful act, practice or course of business
- Engaging in any manipulative practices

Clients and prospective clients may request a copy of the firm's Code of Ethics by contacting the CCO.

Personal Trading

We can recommend securities to you that we will purchase for our own accounts. We can trade securities in our account that we have recommended to you as long as we place our orders after your orders or block trade. This policy is meant to prevent us from benefiting as a result of transactions placed on behalf of advisory accounts.

Certain affiliated accounts may trade in the same securities with your accounts on an aggregated basis when consistent with our obligation of best execution. When trades are aggregated, all parties will share the costs in proportion to their investment. We will retain records of the trade Order (specifying each participating account) and its allocation. Completed Orders will be allocated as specified in the initial trade order. Partially filled Orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

West Wealth Group has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of "Access Persons". The policy requires that an Access Person of the firm provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date the Adviser selects.

We have established the following restrictions in order to ensure our fiduciary responsibilities regarding insider trading are met:

- No securities for our personal portfolios shall be bought or sold where this decision is substantially derived, in whole or in part, from the role of IARs of West Wealth Group, unless the accounts are traded together with client accounts in an aggregate transaction (so the pricing is the same as clients' pricing) or the information is available to the investing public on reasonable inquiry. In no case, shall we put our own interests ahead of yours.

Privacy Statement

We are committed to safeguarding your confidential information and hold all personal information provided to us in the strictest confidence. These records include all personal information that we collect from you or receive from other firms in connection with any of the financial services they provide. We also require other firms with whom we deal with to restrict the use of your information. Our Privacy Policy is available upon request.

Conflicts of Interest

We act in a fiduciary capacity. If a conflict of interest arises between us and you, we shall make every effort to resolve the conflict in your favor. Conflicts of interest may also arise in the allocation of investment opportunities among the accounts that we advise. We will seek to allocate investment opportunities according to what we believe is appropriate for each account. We strive to do what is equitable and in the best interests of all the accounts we advise.

Item 12 – Brokerage Practices

Factors Used to Select Custodians

In recommending a custodian, we look for a company that offers relatively low transaction fees, access to desired securities, trading platforms, and support services. We will recommend clients use TD Ameritrade as the qualified custodian for their accounts when utilizing our asset management services.

Economic and Non-Economic Benefits

The Adviser participates in the institutional advisor program (the “Program”) offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC (“TD Ameritrade”), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Adviser receives economic and non-economic benefits from TD Ameritrade through its participation in the Program.

As disclosed above, the Adviser participates in TD Ameritrade’s institutional customer program and the Adviser will recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Adviser’s participation in the program and the investment advice it gives to its Clients, although the Adviser receives benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Adviser by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by Adviser’s related persons. Some of the products and services made available by TD Ameritrade through

the program may benefit Adviser but may not benefit its Client accounts. These products or services may assist Adviser in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Adviser manage and further develop its business enterprise. The benefits received by the Adviser or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Adviser endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Adviser or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Adviser's choice of TD Ameritrade for custody and brokerage services.

Best Execution

We have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a custodian services, including the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we do not promise to obtain the lowest possible commission rates for account transactions.

Brokerage for Client Referrals

We do not receive client referrals from the qualified custodian we use.

Directed Brokerage

We do not permit directed brokerage. We will require you to use the custodian of our choosing as the custodial firm.

Aggregated Trading

Transactions for each client account generally will be affected independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) aggregate or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients' differences in prices and commission or other transaction costs. Under this procedure, transactions will be price-averaged and allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day. We do not aggregate orders for different financial professionals that may enter orders for the same security on the same day.

ERISA 3(21) and 3(38)

As it relates to ERISA Plan business, the Adviser does not trade in participant accounts when providing 3(21) services. However, when providing 3(38) services to 401K plans, we shall trade in the accounts of 401K participants on a discretionary basis.

Best Execution

The Adviser does not trade in any Plan client accounts when providing 3(21) services. When providing 3(38) services, we have an obligation to seek best execution for you. In seeking best execution, the determinative factor is not the lowest possible commission cost but whether the transaction represents the best qualitative execution, taking into consideration the full range of a custodian services, including

the value of research provided, execution capability, commission rates, reputation and responsiveness. Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for account transactions.

Trading

The Adviser does not trade in individual Plan participant accounts when providing non-discretionary 3(21) services. When providing 3(38) services to 401Ks, we shall trade in participant accounts.

Item 13 – Review of Accounts

Reviews

Reviews are conducted at least annually or as agreed to by us. Reviews will be conducted by your investment adviser representative. You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place. Generally, we will monitor for changes and shifts in the economy, changes to the management and structure of a mutual fund or company in which client assets are invested, and market shifts and corrections.

Reports

We do not provide any additional statements to clients; the only statements clients will receive are those provided by the custodian(s).

Item 14 – Client Referrals and Other Compensation

As disclosed under the *Fees and Compensation* section in this brochure, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to the *Fees and Compensation* section.

Clients that recommend us to others they know receive a one-time \$50 donation to a charity of their choice for these referrals. The donation is made if you choose to have an initial meeting with us and is not predicated on whether or not the referral becomes a client. No one is charged additional fees based on this compensation arrangement. Clients that make these referrals have an indirect financial incentive to recommend us to others for advisory services. This creates a conflict of interest; however clients are not obligated to provide referrals and referrals are not required to retain our firm for advisory services. Comparable services and/or lower fees may be available through other firms.

Advertising and Referral Program

We utilize an advertising and referral program for investment professionals offered through the Ramsey Solutions' SmartVestor program, (hereinafter, "SmartVestor") for client referrals within a specific geographic region. SmartVestor is offered by Dave Ramsey, a media personality. Referred prospects are not required nor obligated in any way to work with the Adviser.

The Firm's financial professionals that choose to participate in SmartVestor, pay a monthly membership

and advertising fee for leads made available through the SmartVestor website. The monthly fee is not contingent on a referral becoming a client or on the number of referrals that are received. SmartVestor provides prospective clients with three to five potential investment professionals (Pros) located in the individual's general geographic area. If more than five Pros are located within the specific market assigned to the client's zip code, SmartVestor issues a random selection of five Pros to the prospective client.

Unless the prospective client opts out of having their contact information shared, each SmartVestor Pro will generally contact a referred client within one business day of receiving the contact information. The prospective client determines whether to contact our firm from the investment professionals listed on the website. SmartVestor's role is limited to facilitating an initial introduction between the prospective clients and our firm. The SmartVestor program does not provide prospective clients with an assessment of the merits or shortcomings of any particular investment professional or their investment strategies. SmartVestor is a lead generation service and does not provide investment advice. You will not pay additional fees because of this referral arrangement.

Although this is an advertising and referral program, it is also considered a "solicitor" arrangement by the SEC. For that reason, we will provide all referred prospects with a copy of the applicable disclosure document as required under SEC Rule 206(4)-3(a)(2)(iii)(B) of the Advisers Act, and request that you sign a copy for our records. This disclosure document will provide you with information about our arrangement with SmartVestor.

The selection of an investment adviser is important and should not be based solely on advertising or referrals, including referrals from entities affiliated with well-known personalities. Individuals that are referred to the firm through Dave Ramsey's Ramsey Solutions are free to work with any investment adviser or financial professional of their choosing.

Generally solicitors receive payment if a referral becomes a client but in the case of SmartVestor, the monthly membership and advertising fee are paid regardless of the number of referrals the financial professional receives and it is not based on whether or not the referred prospect becomes a client. You do not pay additional fees because of the financial professional's participation in the SmartVestor program.

Item 15 – Custody

We do not have physical custody of any accounts or assets. However, we may be deemed to have custody of advisory accounts if we have the ability to deduct your advisory fees from the custodian. We use TD Ameritrade as the custodian for all your accounts. You should receive at least quarterly statements from the custodian that holds and maintains your investment assets. We urge you to carefully review such statements and contact us if there are any discrepancies or you have questions.

TD Ameritrade debits your monthly advisory fees directly from your advisory account. We send information to your custodian to debit your fees and to pay them to us. You authorized the custodian to

pay us directly at the onset of the relationship.

Wire Transfers or Standing Letters of Authorization

Our firm, or persons associated with our firm, may effect wire transfers from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization or SLOA. An adviser with authority to conduct such third party wire transfers has access to the client's assets as defined under the SEC's custody rule, and therefore has custody of the client's assets in any related accounts.

However, we are not required to obtain a surprise annual audit, as we otherwise would be for these accounts, as long as we meet the following criteria:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

We hereby confirm that we meet the above criteria.

Item 16 – Investment Discretion

We manage assets on a discretionary basis. Discretionary authority, which will be evidenced via the written, discretionary agreement between the client and the Adviser, will provide us with the authority to determine the following without your consent:

- Securities to be bought or sold for your account
- Amount of securities to be bought or sold for your account

In all cases this discretion is exercised in a manner consistent with your stated investment objectives for your account and in accordance with any restrictions placed on the account.

When active asset management services are provided on a discretionary basis the client will enter into a separate custodial agreement with the custodian. The custodian agreement will include a limited power

of attorney to trade in the client's account(s) which authorizes the custodian to take instructions from us regarding all investment decisions for your account.

Qualified Retirement Plan Advisory Services

Our recommendations regarding our 3(21)-qualified retirement plan consulting services are made on a non-discretionary basis. The plan sponsor retains the decision-making authority over the plan. When recommending securities, we observe the investment policies, limitations, and restriction set by the plan and plan sponsor.

Our investment decisions regarding our 3(38)-qualified retirement plan consulting services are made on a discretionary basis.

In performing discretionary management services, the Adviser is acting as an "investment manager" (as that term is defined in Section 3(38) of ERISA) and as a fiduciary to the Plan and shall act with the care, skill, prudence and diligence under the circumstances then prevailing that a prudent man acting in a capacity and familiar with such matters would use in the conduct of an enterprise of like character and with like aims.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in your portfolios. We may provide advice to you regarding your voting of proxies. The custodian will forward you copies of all proxies and shareholder communications relating to your account assets.

Item 18 – Financial Information

We have no financial commitment that would impair our ability to meet any contractual and fiduciary commitments to you, our client. We have not been the subject of any bankruptcy proceedings. In no event shall we charge advisory fees that are both in excess of twelve hundred dollars (\$1,200) and more than six months in advance of advisory services rendered.