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3/9/2011

FORM ADV PART 2 BROCHURE

This Brochure provides information about the qualifications and business practices of Estate Counselors, LLC. If you have any questions about the contents of this Brochure, please contact us at (262) 238-6996 or at firm@estatecounselors.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Estate Counselors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Estate Counselors, LLC is 123452.

Estate Counselors, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Communications between Estate Counselors, LLC and its clients are not covered by the attorney-client privilege, and as a result may be discoverable by third parties. All such communications are, however, covered by Estate Counselors, LLC's privacy policy, a copy of which is available upon request.

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Advisory Business

Form ADV Part 2A, Item 4

Description of Services and Fees

Estate Counselors, LLC is a registered investment adviser based in Thiensville, WI. We are organized as a limited liability company under the laws of the State of Wisconsin. We have been providing investment advisory services since 2004, formerly under the name of Willms, S.C. and since January 20, 2010 as Estate Counselors, LLC. Andrew J. Willms is the principal owner.

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this Brochure, the words “we”, “our” and “us” refer to Estate Counselors, LLC and the words “you”, “your” and “client” refer to you as either a client or prospective client of our Firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our Firm’s officers, employees, and all individuals providing investment advice on behalf of our Firm.

Portfolio Management Services

Estate Counselors, LLC is an independent financial adviser that provides portfolio management services to individuals, trusts, estates, and investment entities that are long-term investors and who are focused on wealth preservation. We believe that for most long-term investors, investment results can be optimized by investing in a diversified portfolio consisting primarily of no-load index mutual funds and exchange traded funds thereby minimizing expenses.

Our investment approach involves selectively allocating assets among various no-load index and exchange traded mutual funds in a manner that is consistent with an investor's risk tolerance and return objectives. These allocations are then monitored over time and rebalanced as appropriate to reflect changes in the economy or the individual investor's personal situation, and to harvest capital losses when appropriate. Estate Counselors, LLC is primarily a percentage fee based adviser although clients can choose to be billed on an hourly basis.

We offer discretionary and non-discretionary portfolio management services. Our investment advice is tailored to meet our clients’ needs and investment objectives. If you retain our Firm for portfolio management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the “suitability information”) at the beginning of our advisory relationship. We will use the suitability information we gather to develop a strategy that enables our Firm to give you continuous and focused investment advice and/or to make investments on your behalf.

As part of our portfolio management services, we will develop an investment portfolio for you that is specifically tailored to your risk tolerance and investment objectives. Once we construct an investment portfolio for you, we will monitor your portfolio’s performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your personal circumstances.

If you participate in our discretionary portfolio management services, we require you to grant our Firm discretionary authority to manage your account. Discretionary authorization will allow our Firm to determine the specific securities, and the amount of securities, to be purchased or sold for your

account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our Firm, a limited power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our Firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our Firm, we must obtain your approval prior to executing any transactions on behalf of your account.

Our fee for portfolio management services is based on a percentage of your assets we manage and is set forth in the following fee schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
First \$1,000,000	0.75%
Next \$4,000,000	0.60%
Over \$5,000,000	0.40%

While our investment approach is intended to tailor our client's portfolios to their personal risk tolerance, there is no guarantee that the investments we recommend, or the stock market generally, will perform in the future as they have in the past. As a result, even though a portfolio is intended to result in a certain level of risk the actual volatility experienced in the account's value may be greater than anticipated.

For most clients, investment risk is managed through investment selection and diversification. However, when market conditions are at their worst, the divergence in the performance of various asset classes lessens, and as a result the benefits of diversification can be reduced. Therefore, Estate Counselors, LLC offers qualified investors the ability to use stock option contracts in an effort to reduce portfolio risk. Advanced strategies such as option collars can be implemented for clients who wish to go beyond asset class diversification in an effort to hedge against a sharp broad-based decline in equity prices.

While collars protect investors from market declines at no or reduced costs, they also introduce a different type of cost to the portfolio; namely the opportunity cost of limiting the investor's participation if equity prices rise. We prefer to use option strike prices that limit the amount at risk with respect to the security covered by the collar to no more than 7.5% and limit the potential upside to no less than 5% while the collar is outstanding (exclusive of the cost of the collar and dividends collected). We also favor option contracts that expire in 6 months or less.

The amount of time and effort needed to implement, monitor and maintain stock options is considerable. As a result, Estate Counselors, LLC utilizes a slightly higher fee schedule when determining our fees for clients who request that we use contracts in their portfolios. That fee schedule is as follows:

<u>Assets Under Management</u>	<u>Annual Fee</u>
First \$1,000,000	1.00%
Next \$4,000,000	0.80%
Over \$5,000,000	0.60%

Our annual portfolio management fee is billed and payable monthly in arrears based on the value of your account on the last day of the month. If the portfolio management agreement is executed at any time other than the first day of a calendar month, 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 month for which you are a client. Clients will be billed a 1% per month interest charge for unpaid invoices over 30 days old. Clients may incur a onetime set up fee separate from the hourly charges.

Our advisory fee is negotiable, depending on individual client circumstances. 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 will increase the amount of assets to which our fee schedule is applied, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will send you an invoice for the payment of our advisory fee, or we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our Firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy. We will also receive a duplicate copy of your account statements.

You may terminate the portfolio management agreement upon written notice to our Firm. 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.

We encourage you to reconcile our invoices with the statement(s) you receive from the qualified custodian. If you find any inconsistent information between our invoice and the statement(s) you receive from the qualified custodian please call our main office number located on the cover page of this Brochure.

Advisory Consulting Services

We offer consulting services which primarily involves advising clients on specific financial-related topics. The topics we address may include, but are not limited to, risk assessment/management, investment planning, financial organization, or financial decision making/negotiation. We charge negotiable hourly fee for advisory consulting services according to the following hourly fee schedule:

Hourly Fee Schedule

<u>Counselor</u>	<u>Rate</u>
Andrew J. Willms Esq.	\$350.00 / hour
Michael J. Willms	\$300.00 / hour

Types of Investments

As mentioned above, we primarily advise that no-load index mutual and exchange traded funds be used to implement our investment recommendations. However, we are not limited to any security. We may give advice on equity securities, certificates of deposit, municipal securities, investment company securities, U.S. Government securities, and options contracts on securities.

Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your

portfolio at the inception of our advisory relationship.

You may request that we refrain from investing in particular securities or certain types of securities. These restrictions must be provided in advance to us by you to our Firm in writing.

Assets Under Management

As of 12/31/2010, we manage \$151,721,849 in client assets on a discretionary basis, and \$4,109,313 in client assets on a non-discretionary basis.

Fees and Compensation

Form ADV Part 2A, Item 5

Please refer to the “Advisory Business” section in this Brochure for information on our advisory fees, fee deduction arrangements, and refund policy according to each service we offer.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our Firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund’s prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. However, we only recommend no-load funds, and we never collect a fee or commission from the mutual fund provider.

You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through which your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our Firm, and others. For information on our brokerage practices, please refer to the “Brokerage Practices” section of this Disclosure Brochure.

Performance-Based Fees and Side-By-Side Management

Form ADV Part 2A, Item 6

We do not accept performance-based fees or participate in side-by-side management. (Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or capital appreciation of a client’s account.) Our fees are calculated as described in the *Advisory Business* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Types of Clients

Form ADV Part 2A, Item 7

We offer portfolio advisory services to individuals, trusts, estates, and charitable organizations.

In general, we require a minimum of \$500,000 to open and maintain an advisory account. At our discretion, we may waive this minimum account size. For example, we may waive the minimum if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

Methods of Analysis, Investment Strategies and Risk of Loss

Form ADV Part 2A, Item 8

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- **Modern Portfolio Theory (MPT)** – Modern Portfolio Theory focuses on the development of a portfolio of investments which will maximize total return for the portfolio as a whole for a given level of risk. Modern Portfolio Theory emphasizes that a portfolio diversified among various asset classes can produce higher returns for a particular level of total risk than a portfolio which is concentrated in just one or more limited number of asset classes.
- **Long Term Purchases** – Securities are purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- **Passive Investing** – We believe that the amount an individual investor should allocate to various asset classes will depend on his or her individual risk assessment, income needs and investment horizon, and not on the expected fortunes of a particular company or the economy as a whole.
- **Margin Transactions** – A securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.
- **Option Writing** – Careful use of the option contracts can reduce “tail risk”, which is the risk of a dramatic, sudden decline in the value of a portfolio triggered by an unexpected event.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your individual restrictions and guidelines will affect the composition of your portfolio.

Modern Portfolio Theory (MPT)

Modern Portfolio Theory is a theory of investing which attempts to maximize a portfolio's expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully choosing the proportions of various assets. MPT is a mathematical formulation of the concept of diversification in investing, with the aim of selecting a collection of investment assets

that has a collectively lower risk than any individual asset. The risk, return, and correlation measures used by MPT are mathematical statements about the future. In practice investors must substitute predictions based on historical measurements of asset return and volatility for these values in the equations. Very often such expected values fail to take account of new circumstances which did not exist when the historical data was generated.

Short Term Trading

We may use short-term trading (in general, selling securities within one year of purchasing the same securities) as an investment strategy when managing your account(s). Short-term trading is not a fundamental part of our overall investment strategy, but we may use this strategy occasionally when we determine that it is suitable given your stated investment objectives and tolerance for risk. Short term trades can also be used to reduce capital gain taxes, as discussed below.

Passive vs. Active Investment Approach

“Active” investment management involves buying and selling stocks of individual corporations. Investment decisions are driven by a desire to buy stocks of those companies the advisor believes the rest of the market has under-valued and to sell those stocks the investor believes the market has over-valued. This management style also involves trying to time investment decisions in order to be more heavily invested when the market is rising and less so when the market is falling.

“Passive” investment management is based on the premise that because the stock market is very efficient, what is publicly known about a company and the economy as a whole is already reflected in the stock price. Therefore, the price at which a stock is traded is the best indication of its value. As a result, we believe trying to predict whether the stock of a particular company is headed higher or lower is not a worthwhile endeavor. Using a passive investment should also reduce fees and lower taxes because less trading is involved.

Hedging Risk

A “stock option” is a right to buy or sell stock (or ETF shares) at a stated price for a specified period of time determined by the “expiration date” indicated in an “option contract”. There are two types of stock options. “Puts” give the holder the right to sell the stock at a strike price to the writer on or before the expiration date; while the “calls” give the holder the right to buy the stock from the writer at the strike price on or before the expiration date. Combining put and call stock options to create a “collar” on equity index ETFs held in a client’s portfolio can substantially mitigate downside risk that a market correction would otherwise present to the value of the client’s portfolio. A collar consists of one “long” (purchased) put and one “written” (sold) call on the same underlying stock. The primary reason for utilizing a collar is to protect the current value of a portfolio from sharp declines. If the premium received from writing the call equals the cost of purchasing a put, the investor is obtaining downside protection with little out of pocket cost. Other hedging techniques that can be employed under appropriate circumstances include selling cash covered puts in lieu of purchasing securities that are included in the client’s model portfolio and overweighting in cash and purchasing out of the money option contracts that should rise in value if stock prices rise.

Tax Considerations

Helping assure our clients do not incur unnecessary capital gain taxes is an important component of our investment strategy. This is accomplished by limiting trading activity, and harvesting capital losses. Harvesting capital losses refers to the practice of selling investments that have a significant unrealized loss, recognizing the loss, and reinvesting the sale proceeds in another investment that is very similar (but not identical) to the investment that was sold. This strategy allows our clients to recognize the loss embedded in the security which is being sold, while maintaining his or her

exposure to the asset class the sold security represented. The loss can then be used to offset gains that might be realized when selling an appreciated security as dictated by the need to rebalance, as explained above.

Our strategies and investments advice may have unique and significant tax implications. These ramifications are taken into account by us as part of our investment advice. However, unless we specifically agree in writing to the contrary, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Our Firm uses Specific Identification accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our Firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Recommendation of Particular Types of Securities

As disclosed under the "Advisory Business" section in this Brochure, we primarily recommend no-load index based mutual and exchanged traded funds (ETFs). However, we may recommend other types of investments as we deem appropriate since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

The unique risk involved with utilizing ETFs pertains to liquidity and depth of market. Because ETFs trade on listed stock exchanges, very large orders could potentially affect market prices. It is therefore important not to enter large trades as market orders. In addition, ETF market prices may differ from the underlying net asset value of the basket of securities the ETF tracks. Research into the pricing of ETFs has generally concluded that any discrepancy is minor in amount and usually only lasts for a short period of time. The risk of pricing errors is much higher in funds that do not trade regularly, such as certain foreign ETFs. Finally, ETFs utilizing derivatives may not always accurately track the index they are pegged to. This is particularly true with respect to commodity based ETFs if contango is affecting the price of the commodity it tracks.

Disciplinary Information

Form ADV Part 2A, Item 9

Estate Counselors, LLC has been registered and providing investment advisory services since 2004, and Andrew J. Willms has been registered with the SEC as an investment adviser representative since 2004. The SEC is responsible for overseeing the activities of registered investment advisors and disciplines advisors who engage in fraudulent or illegal business practices. Neither Estate Counselors, LLC, its employees nor Andrew J. Willms has been a party to disciplinary proceedings.

Other Financial Industry Activities and Affiliations

Form ADV Part 2A, Item 10

We are affiliated with Willms S.C. law firm through common control and ownership. If you require legal services, we will recommend that you use Willms S.C. law firm. Our advisory services are separate and distinct from the compensation paid to Willms S.C. law firm for their services.

Communications between Estate Counselors, LLC and its clients are not covered by the attorney-client privilege, and as a result may be discoverable by third parties. All such communications are, however, covered by Estate Counselors, LLC's privacy policy, a copy of which is available upon request.

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

Form ADV Part 2A, Item 11

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Our Code of Ethics also requires that certain persons associated with our Firm submit reports of their personal account holdings and transactions to a qualified representative of our Firm who will review these reports on a periodic basis. Persons associated with our Firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our Firm.

Our Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Andrew J. Willms at 262 238-6996 or firm@estatecounselors.com.

Participation or Interest in Client Transactions

Neither our Firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of portfolio advisory services as disclosed in this Brochure.

Personal Trading Practices

Our Firm or persons associated with our Firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that Associated Persons shall not have priority over your account in the purchase or sale of securities.

Brokerage Practices

Form ADV Part 2A, Item 12

Client investments are held at a broker-dealer who serves as the custodian of the account. The broker-dealer is also responsible for executing trades and provides clients with trade confirmations and monthly statements.

We have chosen Fidelity Brokerage Services, LLC as our broker-dealer. While you are free to choose any broker-dealer or other service provider, we recommend that our clients establish an account with Fidelity. We believe that Fidelity provides quality execution services for our clients at competitive prices. Price is not the sole factor we consider in evaluating best execution. We also consider the quality of the brokerage services provided by Fidelity, including the value of research provided, the Firm's reputation, execution capabilities, commission rates, and responsiveness to our clients and our Firm.

In limited circumstances, and at our discretion, some clients may instruct our Firm to use one or more particular brokers for the transactions in their accounts. If you choose to direct our Firm to use a particular broker, you should understand that this might prevent us from effectively negotiating brokerage commissions on your behalf. This practice may also prevent our Firm from obtaining favorable net execution prices. Thus, when directing brokerage business, you should consider whether the commission expenses, execution, clearance, and settlement capabilities that you will obtain through your chosen broker are adequately favorable in comparison to those that we would otherwise obtain for you.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Block Trades

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size and investment objectives of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating

account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our Firm or persons associated with our Firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Review of Accounts

Form ADV Part 2A, Item 13

Andrew Willms, Chief Compliance Officer and Managing Member of Estate Counselors, LLC monitors your accounts on a regular basis. Account reviews will be conducted as agreed with the client in advance. The reviews are conducted to ensure the advisory services provided to clients and that the portfolio mix is consistent with the client's current investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

We will provide you with a monthly or quarterly portfolio report in conjunction with account reviews. You will receive trade confirmations and monthly statements from your account custodian(s). You should compare our statements with the statements from your account custodian(s) to reconcile the information reflected on each statement. If you have a question regarding your account statement or if you did not receive a statement from your custodian, please contact us at (262) 238-6996 or Izakrajsheck@estatecounselors.com.

Client Referrals and Other Compensation

Form ADV Part 2A, Item 14

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

Custody

Form ADV Part 2A, Item 15

Your funds and securities will be held with Fidelity as a qualified custodian selected by you. You will receive account statements from the independent, qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount

of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. We will also provide statements to you reflecting the amount of advisory fee deducted from your account.

Notwithstanding the foregoing, because we, upon your approval, directly debit your account(s) for the payment of our advisory fees, our Firm has limited custody over your funds or securities. We do not, however, have physical custody of any of your funds and/or securities.

Investment Discretion

Form ADV Part 2A, Item 16

Before we can manage your investments, you must first sign our Investment Management Agreement. Under the terms of this Agreement, you may select any one of the following alternatives:

Option 1. Non-discretionary Investment Authority

If you select this option then we shall make such recommendations to you as to the retention, disposition, investment and reinvestment of your account as we consider advisable, but no investment action shall be taken without your approval; provided, however, that we may, in our sole discretion and without your approval, temporarily invest income and principal cash in short term money market funds and similar short term instruments.

Option 2. Discretionary Investment Authority

If you select this option then we are authorized, without your prior consultation, to buy, sell, and trade in stocks, bonds, mutual funds, index funds, exchange traded funds, and other securities and/or contracts relating to the same ("Securities"), when we deem necessary to either (i) maintain an asset allocation that is consistent with your model portfolio, or (ii) to take advantage of an opportunity to harvest capital losses in securities that have declined in value since their acquisition, and to give instructions in furtherance of such trading authority to the broker-dealer of the account ("Broker-Dealer") and the custodian of the assets ("Custodian").

Option 3. Full Investment Authority

If you select this option then you appoint us as your attorney-in-fact and grant us limited power-of-attorney and trading authority over your account with discretionary authority to buy, sell, or otherwise effect investment transactions involving the assets.

Regardless of which of the foregoing options is selected, your portfolio will be managed in a manner that is consistent with an Investment Policy Statement that will be given to you at the commencement of our engagement. Your Investment Policy Statement will set forth our understanding of your long-term investment objectives, and the investments we are recommending for you in light thereof.

If you enter into non-discretionary arrangements with our Firm, we will obtain your approval prior to the execution of any transactions for your account(s).

Voting Client Securities

Form ADV Part 2A, Item 17

Proxy Voting

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of common stock or mutual funds, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our Firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

Financial Information

Form ADV Part 2A, Item 18

We are not required to provide financial information to our clients because we do not:

- require the prepayment of more than \$1,200 in fees and six or more months in advance, or
- take custody of client funds or securities, or
- have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

Requirements for State-Registered Advisers

Form ADV Part 2A, Item 19

Estate Counselors, LLC is SEC registered.

Additional Information

Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will never sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy policy notice prior to or at the time you sign an advisory agreement with our Firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact Andrew J. Willms at (262) 238-6996 or firm@estatecounselors.com, if you have any questions regarding this policy.

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account. If a trade error results in a profit, you will keep the profit.