



The GenWealth Group, Inc.

Form ADV 2A

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973-761-0400

www.thegenwealthgroup.com

March 29, 2012

This Brochure provides information about the qualifications and business practices of The GenWealth Group, Inc. If you have any questions about the contents of this Brochure, please contact us at (973) 761-0400 or kimberly@thegenwealthgroup.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.

The GenWealth Group, Inc. 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 about which you determine to hire or retain an Adviser.

Additional information about The GenWealth Group, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

This brochure dated March 29, 2012 is a new amended document prepared according to the SEC's requirements and rules. This Brochure has been amended with material changes made to our last annual update dated March 11, 2011.

Pursuant to SEC Rules, we will ensure that you receive an amended brochure or a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Kimberly DiBlasi, Chief Operations and Compliance Officer at 973-761-0400 or kimberly@thegenwealthgroup.com.

Additional information about The GenWealth Group, Inc. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with The GenWealth Group, Inc. who are registered, or are required to be registered, as investment adviser representatives of The GenWealth Group, Inc.

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Item 4 – Advisory Business

The GenWealth Group, Inc., established in May, 2008 and owned by Michael P. Leanza, is an investment adviser providing financial planning and investment management services to individuals, pension and profit sharing plans, charitable organizations, corporations and business entities. The GenWealth Group, Inc. offers its services on a fee basis based upon assets under management and enters into written agreements with clients that set forth the terms and conditions of the relationship.

The GenWealth Group, Inc. depends on clients to provide accurate information about their situation and needs and does not verify the information with a third party. It is the clients' responsibility to promptly notify The GenWealth Group, Inc. if there is a change in financial situation or investment objectives.

The GenWealth Group, Inc. generally imposes a minimum portfolio value for its investment management services, but may waive its stated account minimum or charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

While The GenWealth Group, Inc. offers advice on several types of investments, clients' assets are primarily allocated on a discretionary basis to mutual funds, exchange traded funds, variable annuities and individual debt securities per the investment objectives of the client.

The GenWealth Group, Inc. uses LPL Financial for brokerage and clearing services for investment management accounts. In order to implement its investment management recommendations, clients furnish information and authorization regarding accounts with appropriate financial institutions (LPL Financial, any other broker-dealer recommended, broker-dealer directed by the client, trust companies, banks etc.).

Some clients have their portfolios allocated to securities on a discretionary basis using one or more proprietary investment strategies. For these cases, The GenWealth Group, Inc. buys, sells, exchanges and transfers shares based upon the investment strategy.

For accounts covered by ERISA (and others that The GenWealth Group, Inc. deems appropriate), the commission arrangement may be altered to allow for investment advisory services to be provided on a fee-offset basis (by an amount equal to the aggregate commissions and 12b-1 fees earned by The GenWealth Group, Inc. employees as registered representatives of LPL).

The GenWealth Group, Inc.'s proprietary investment strategies have been designed to comply with federal rules and regulations. To comply with these rules, The GenWealth Group, Inc. does the following:

1. Initial Interview – an initial interview is conducted with each client to determine the client's financial circumstances, goals, acceptable levels of risk, any reasonable restrictions on the management of their account, and other relevant circumstances;
2. Individual Treatment – the client's account is managed on the basis of the client's financial circumstances and investment objectives;
3. Consultation – an advisor of The GenWealth Group, Inc. knowledgeable about the client's account shall be reasonably available to consult with the client relative to the status and management of their account;
4. Notice of Transactions – the client shall receive notice of all transactions in their account as if they had maintained a similar account outside of the investment strategy;
5. Quarterly Statement – the client shall be provided with a quarterly statement containing a description of all activity in their account;
6. Ability to Impose Restrictions – the client shall have the ability to impose reasonable restrictions on the management of their account, including the ability to instruct The GenWealth Group, Inc. not to purchase certain securities or types of securities;
7. No Pooling – the client's beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the client's account;
8. Separate Account – a separate account is maintained for the client with the custodian; and
9. Ownership - each client retains the right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations

Clients may, in writing, place reasonable limitations upon The GenWealth Group, Inc.'s discretionary authority. The investment strategy may involve an above-average portfolio turnover that could negatively impact upon the net after-tax gain experienced by an

individual client. Securities in the investment strategy are usually exchanged and/or transferred without regard to a client's individual tax ramifications. Certain investment opportunities that become available to The GenWealth Group, Inc.'s clients may be limited. For example, various mutual funds or insurance companies may limit the ability of The GenWealth Group, Inc. to buy, sell, exchange or transfer securities consistent with its investment strategy. In order to meet its fiduciary duties to all of its clients, The GenWealth Group, Inc. will endeavor to allocate investment opportunities among its clients on a fair and equitable basis. Participation in The GenWealth Group, Inc.'s investment strategy carries additional risk to clients in that a mutual fund or insurance company may unilaterally restrict and/or prohibit The GenWealth Group, Inc.'s trading activities thus prohibiting it from managing the assets consistent with the investment strategy.

The GenWealth Group, Inc. is the sponsor of a wrap fee program. For client's participating in the wrap program, The GenWealth Group, Inc., will charge an annual fee based upon a percentage of the market value of the assets being managed that includes all commissions or transaction fees, which otherwise would be incurred by the client. Participants in the wrap program may pay a higher aggregate fee than if investment management and brokerage services are purchased separately. A complete description of the wrap fee program's terms and conditions (including fees) are contained in the wrap fee brochure. This written disclosure statement is provided to each client. There is no difference between the way investments are managed for wrap fee clients and non-wrap fee clients.

The amount of client assets managed on a discretionary basis total \$112,662,000 as of March 29, 2012. The amount of client assets managed on a non-discretionary basis total \$26,618,000 as of March 29, 2012.

Item 5 – Fees and Compensation

The GenWealth Group, Inc. may provide its clients with a broad range of comprehensive financial planning and consulting services (which may include non-investment related matters). Fees for these services may be charged on a fixed and/or hourly fee basis. The GenWealth Group, Inc.'s financial planning and consulting fees are negotiable, but generally range up to \$5,000 on a fixed fee basis and/or \$300 on an hourly rate basis, depending upon the level and scope of the services. If the client engages The GenWealth Group, Inc. for additional investment advisory services, The GenWealth Group, Inc. may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services.

Prior to providing financial planning or consulting services, The GenWealth Group, Inc. requires a written agreement describing the services that will be provided and the fee arrangement. Generally, one-half of the financial planning / consulting fee (estimated

hourly or fixed) will be payable upon entering the agreement and the balance due upon completion of the agreed upon services. Either party may terminate the agreement by written notice. If the client terminates the agreement, The GenWealth Group, Inc. will refund any unearned fees (if any). If termination is within five business days from entering into an agreement for services the client will be entitled to a full refund.

Clients may incur certain charges imposed by the Financial Institution(s) and other third parties such as, custodial fees, charges imposed directly by a mutual fund or exchange traded fund in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), 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. Additionally, for assets outside of any wrap fee programs, clients may incur brokerage commissions and transaction fees. Such charges, fees and commissions are exclusive of and in addition to the fees of The GenWealth Group, Inc., who will not receive any portion of said fees.

The GenWealth Group, Inc. is the sponsor of a wrap fee program. For client's participating in the wrap program, The GenWealth Group, Inc., will charge an annual fee based upon a percentage of the market value of the assets being managed that includes all commissions or transaction fees, which otherwise would be incurred by the client. Participants in the wrap program may pay a higher aggregate fee than if investment management and brokerage services are purchased separately. A complete description of the wrap fee program's terms and conditions (including fees) are contained in the wrap fee brochure. This written disclosure statement shall be provided to each client.

The GenWealth Group, Inc. is authorized to debit the participating client's accounts for the amount of the agreed upon fee through the recommended financial institution. The financial institution will send a statement to the client, at least quarterly, indicating all amounts disbursed from the accounts including the amount of management fees paid directly to The GenWealth Group, Inc.

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

The GenWealth Group, Inc. does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

The GenWealth Group, Inc. provides financial planning and investment management services to individuals, high net worth individuals, pension and profit sharing plans, charitable organizations and corporations.

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

At The GenWealth Group, Inc., we look to reduce clients risk to appropriate level for each client. While investing in securities involves risk of loss that client should be prepared to bear, our objective is to reduce that risk to a level that is suitable for the individual client. Client risk is assessed through thorough discussion and governed by their investment objective on account opening paperwork. We manage risk through core asset allocation strategies that rely on both traditional asset allocation benefits as well as LPL's internal research (which suggests some over or under-weighting of certain classes.) In addition we have developed a proprietary investment strategy.

Our core investment strategy is called our "Momentum Strategy." This strategy is a technically driven strategy that utilizes exchange traded funds. At the strategies core is the use of both the volatility index (VIX) as well as the 50 day and 200 day moving averages of the underlying exchange traded funds to gauge market volatility and momentum.

The investment strategy may involve an above-average portfolio turnover that could negatively impact upon the net after-tax gain experienced by an individual client. Securities in the investment strategy are usually exchanged and/or transferred without regard to a client's individual tax ramifications. It is important to note that all clients that have elected to utilize the strategy are in fee based advisory accounts (known as SWM II on the LPL platform). On this type of account the client is charged an annual advisory fee and any additional transaction or trading cost is paid by The GenWealth Group, Inc.

Our total book of business at The GenWealth Group, Inc. consists primarily of the following types of securities: Exchange Traded Funds, mutual funds, and variable annuities. As our client book primarily is invested in these risk bearing investments, it is incumbent upon us to review the clients risk, monitor performance and volatility on an ongoing basis.

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 The GenWealth Group, Inc. or the integrity of The GenWealth Group, Inc.'s management. The GenWealth Group, Inc. has no information applicable to this Item

Item 10 – Other Financial Industry Activities and Affiliations

Certain of the Firm's Affiliates (as defined in Form ADV), in their individual capacities, are registered representatives of LPL Financial, an SEC registered broker-dealer and member of the FINRA. In such individual capacities, the Firm's Advisory Affiliates may, from time-to-time, recommend investments outside of the Program for which they may receive

additional compensation. The opportunity to receive additional compensation for effecting securities transactions outside of the Program or purchasing Eligible Securities in the Program that pay additional compensation to the Advisory Affiliates creates a conflict of interest. As a result of this relationship, LPL Financial may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about the Firm's clients, even if client does not establish any account through LPL. If you would like a copy of the LPL Financial privacy policy, please contact the Firm. Additionally, certain of the Firm's Advisory Affiliates are licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully-disclosed basis, the purchase of certain insurance products. A conflict of interest exists to the extent that the Firm or its Advisory Affiliates recommend the purchase of insurance products where the Firm or its Advisory Affiliates receive insurance commissions or other additional compensation.

Item 11 – Code of Ethics

The GenWealth Group, Inc. has adopted a Code of Ethics, pursuant to SEC rule 204A-1, for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. 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 and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at The GenWealth Group, Inc. must acknowledge the terms of the Code of Ethics annually, or as amended.

The GenWealth Group, Inc.'s employees and persons associated with The GenWealth Group are required to follow The GenWealth Group's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of The GenWealth Group, Inc. and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for The GenWealth Group Inc.'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of The GenWealth Group, Inc. will not interfere with

1. Making decisions in the best interest of advisory clients and
2. Implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of The GenWealth Group's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics

in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between The GenWealth Group, Inc. and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with The GenWealth Group Inc's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. The GenWealth Group, Inc. will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. 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.

The GenWealth Group Inc.'s clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Kimberly M. DiBlasi.

Item 12 – Brokerage Practices

Factors which The GenWealth Group, Inc. considers in recommending LPL or any other broker-dealer, to clients include their respective financial strength, reputation, execution, pricing, research, and service. LPL enables The GenWealth Group, Inc. to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by LPL may be higher or lower than those charged by other broker-dealers.

The commissions paid by The GenWealth Group, Inc.'s clients shall comply with The GenWealth Group, Inc.'s duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where The GenWealth Group, Inc. determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while The GenWealth Group, Inc. will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

If the client requests The GenWealth Group, Inc. to arrange for the execution of securities brokerage transactions for the client's account, The GenWealth Group, Inc. shall direct such transactions through broker-dealers that The GenWealth Group, Inc. reasonably believes

will provide best execution. Transactions may be cleared through other broker-dealers with whom The GenWealth Group, Inc. and LPL Financial have entered into agreements for prime brokerage clearing services. The GenWealth Group, Inc. shall periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

The client may direct The GenWealth Group, Inc. in writing to use a particular brokerdealer to execute some or all transactions for the client. In that case, the client will negotiate terms and arrangements for the account with that broker-dealer, and The GenWealth Group, Inc. will not seek better execution services or prices from other brokerdealers or be able to “batch” client transactions for execution through other broker-dealers with orders for other accounts managed by The GenWealth Group, Inc. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, The GenWealth Group, Inc. may decline a client’s request to direct brokerage if, in The GenWealth Group, Inc.’s sole discretion, such directed brokerage arrangements would result in additional operational difficulties or violate restrictions imposed by other broker-dealers.

Transactions for each client generally will be effected independently, unless The GenWealth Group, Inc. decides to purchase or sell the same securities for several clients at approximately the same time. The GenWealth Group, Inc. may (but is not obligated to) combine or “batch” such orders to obtain best execution, to negotiate more favorable commission rates, or to allocate equitably among The GenWealth Group, Inc.’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among The GenWealth Group, Inc.’s clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that The GenWealth Group, Inc. determines to aggregate client orders for the purchase or sale of securities, including securities in which The GenWealth Group, Inc.’s advisors may invest, The GenWealth Group, Inc. shall generally do so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. The GenWealth Group, Inc. shall not receive any additional compensation or remuneration as a result of the aggregation. In the event that The GenWealth Group, Inc. determines that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include:

1. When only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios,

with similar mandates;

2. Allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are expected to produce similar investment results and can be purchased by other accounts;
3. If an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed);
4. With respect to sale allocations, allocations may be given to accounts low in cash;
5. In cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, The GenWealth Group, Inc. may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts; or
6. In cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Consistent with obtaining best execution, brokerage transactions may be directed to certain broker-dealers in return for investment research products and/or services which assist The GenWealth Group, Inc. in its investment decision-making process. Such research generally will be used to service all of The GenWealth Group, Inc.'s clients, but brokerage commissions paid by one client may be used to pay for research that is not used in managing that client's portfolio. The receipt of investment research products and/or services as well as the allocation of the benefit of such investment research products and/or services poses a conflict of interest.

As discussed above, certain advisors at The GenWealth Group, Inc. in their respective individual capacities, are registered representatives of LPL. These advisors are subject to FINRA Rule 3040 which restricts registered representatives from conducting securities transactions away from their broker-dealer unless LPL provides written consent. Therefore, clients are advised that certain advisors may be restricted to conducting securities transactions through LPL unless they first secure written consent from LPL to execute securities transactions through a different broker-dealer. The GenWealth Group, Inc. is cognizant of its duty to obtain best execution and has implemented policies and procedures reasonably designed in such pursuit.

In addition, LPL may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about The GenWealth Group, Inc.'s clients, even if client does not establish any account through LPL. Clients can request a copy of LPL's privacy policy by contacting The GenWealth Group, Inc..

The GenWealth Group, Inc. may receive from LPL, without cost to The GenWealth Group, Inc., computer software and related systems support, which allow The GenWealth Group, Inc. to better monitor client accounts maintained at LPL. The GenWealth Group, Inc. may receive the software and related support without cost because The GenWealth Group, Inc. renders investment management services to clients that maintain assets at LPL. The software and related systems support may benefit The GenWealth Group, Inc., but not its clients directly. In fulfilling its duties to its clients, The GenWealth Group, Inc. endeavors at all times to put the interests of its clients first. Clients should be aware, however, that The GenWealth Group, Inc.'s receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence The GenWealth Group, Inc.'s choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, The GenWealth Group, Inc. may receive the following benefits from LPL through their registered investment advisor group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

Item 13 – Review of Accounts

For those clients to whom The GenWealth Group, Inc. provides investment management services, The GenWealth Group, Inc. monitors those portfolios as part of an ongoing process while regular account reviews are conducted on at least a quarterly basis. For those clients to whom The GenWealth Group, Inc. provides financial planning and/or consulting services, reviews are conducted on an "as needed" basis. Such reviews are conducted by the Principal, Michael Leanza. All investment advisory clients are encouraged to discuss their needs, goals, and objectives with The GenWealth Group, Inc. and to keep The GenWealth Group, Inc. informed of any changes thereto. All investment advisory clients will be reviewed in writing at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Unless otherwise agreed upon, clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom The GenWealth Group, Inc. provides investment advisory services will also receive a report that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis. Clients should compare the account statements they receive.

Those clients to whom the GenWealth Group, Inc. provides financial planning will receive reports from The GenWealth Group, Inc. summarizing its analysis and conclusions as requested by the client or otherwise agreed to in writing by The GenWealth Group, Inc.

Item 14 – Client Referrals and Other Compensation

The GenWealth Group, Inc. does not compensate any person or organization for client referrals and no clients of The GenWealth Group, Inc. provide any economic benefit for our investment advice or services.

Item 15 – Custody

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer or custodian for the client accounts. Those clients to whom The GenWealth Group, Inc. provides investment advisory services will also receive a report that may include such relevant account and/or market-related information such as an inventory of account holdings and account performance on a quarterly basis. The GenWealth Group, Inc. urges clients to compare the account statements they receive. Statements generated from different financial institutions may vary based on accounting procedures, reporting dates or valuation methodologies of certain securities.

Item 16 – Investment Discretion

The GenWealth Group, Inc. usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, The GenWealth Group, Inc. observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, The GenWealth Group, Inc. authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to The GenWealth Group, Inc. in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, The GenWealth Group, Inc. does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. The GenWealth Group, Inc. may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required to provide you with certain financial information or disclosures about The GenWealth Group, Inc.'s financial condition. The GenWealth Group, Inc. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of any bankruptcy proceeding.