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**Wrap Fee Program Brochure  
(ADV Part 2A – Appendix 1)**

**July 28, 2014**

**This wrap fee program brochure provides information about the qualifications and business practices of Good Life Advisors, LLC. If you have any questions about the contents of this brochure, please contact Good Life Advisors, LLC at 610-898-6927 and/or [courtne.nein@lpl.com](mailto:courtne.nein@lpl.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.**

**The designation “registered investment adviser” does not imply a certain level of skill or training.**

**Additional information about good Life Advisors, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **ITEM 2 - MATERIAL CHANGES**

This is the initial Investment Adviser Wrap Fee Program Brochure (ADV Part 2A – Appendix 1) of Good Life Advisors, LLC (“Wrap Fee Brochure”) that is provided to all clients who maintain a wrap fee account(s) with Good Life, as required based on Good Life’s registration as an investment adviser with the United States Securities and Exchange Commission.

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## **ITEM 4 - SERVICES, FEES AND COMPENSATION**

### **A. Services**

Good Life Advisors, LLC ("Good Life," "Advisor," "our," or "we") offers asset management services based on the individual needs of the client. This Brochure provides a description of the advisory services offered under the Good Life Wrap Fee Program ("Program").

For more information about Good Life's other investment advisory services, please contact the Advisor for a copy of a similar brochure that describes such services or go to [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

In the Program, the Advisor provides ongoing investment advice and management on the assets in the client's account. The Advisor provides advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), individual equities, and fixed income securities. The Advisor provides advice that is tailored to the individual needs of the client based on the investment objectives and risk tolerance chosen by the client. Clients may impose restrictions on investing in certain securities or groups of securities by indicating such restrictions in the written advisory agreement with the Advisor.

In the Program, the Advisor provides management services only on a discretionary basis, which means the client gives the Advisor the authority to make investment decisions to purchase and/or sell securities in the client's wrap-fee account without requiring the Advisor to obtain prior approval from the client to effect each transaction. The client authorizes the Advisor's discretionary authority when signing an investment advisory agreement with Advisor.

Assets for Program accounts are held at LPL Financial ("LPL") as custodian. LPL also acts as executing broker-dealer for transactions placed in Program accounts, and provides other administrative services as described throughout this Brochure.

### **B. Fees**

In the Program, clients pay the Advisor a single annual advisory fee for advisory services and the execution of transactions. Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee. The advisory fee is negotiable between the client and the Advisor and is set out in the advisory agreement. The advisory fee is a percentage based on the value of all assets under management in the account, including cash holdings. The maximum advisory fee is 3.00%.

The advisory fee may be higher than the fee charged by other investment advisors for similar services. The advisory fee is paid to Advisor and is shared between Advisor and its investment adviser representatives ("Representatives").

Good Life does not accept performance-based fees for Program accounts.

The advisory fee is deducted from the account by LPL as the custodian of assets based on a written authorization from the client. LPL calculates and deducts the advisory fee quarterly in advance. If the advisory agreement is terminated before the end of the quarterly period, the client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

Although clients do not pay a transaction charge for transactions in the Program account, clients should be aware that Good Life pays LPL transaction charges for the transactions. The transaction charges that are paid by the Advisor vary based on the type of transaction (e.g., mutual fund, equity or fixed income security).

Because Good Life pays the transaction charges in Program accounts, there is a conflict of interest. Clients should understand that the cost to the Advisor of transaction charges may be a factor that the Advisor considers when deciding which securities to select and how frequently to execute transactions in a program account.

**Good Life's Chief Compliance Officer, Richard Gromis, is available to address any questions a prospective client or client may have regarding the above arrangements and any corresponding perceived conflict of interest any such arrangement may create.**

**(1) Fee Differentials.** In certain circumstances, the Registrant, in its sole discretion, may charge a different wrap fee (higher or lower) based upon certain criteria (i.e., complexity of the engagement, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, anticipated level and scope of other services to be provided (i.e., financial planning services), negotiations with client etc.).

**(2) Fee Payment.** Clients will be charged in advance at the beginning of each calendar quarter based upon the value (market value or fair market value in the absence of market value, plus any credit balance or minus any debit balance), of the client's account at the end of the previous quarter. Fees are prorated for accounts opened during the quarter. An additional fee for the current quarter will be assessed if assets are deposited after the beginning of the quarter, prorated based on the number of calendar days remaining in the quarter during which the service will be in effect. No portion of the fee will be credited to the client for the current calendar quarter should any withdrawals from the portfolio occur in the same calendar quarter.

**(3) Termination of Advisory Relationship.** A client agreement may be canceled at any time, by either party, for any reason upon receipt of prior written notice. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

### **C. Other Types of Fees and Charges**

Program accounts will incur additional fees and charges from parties other than the Advisor as noted below. These fees and charges are in addition to the advisory fee paid to the Advisor. The Advisor does not share in any portion of these third party fees.

LPL, as the custodian and broker-dealer providing brokerage and execution services on program accounts, will impose certain fees and charges. LPL notifies clients of these charges at the opening of the account and makes available a list of these fees and charges on its website at [www.lpl.com](http://www.lpl.com). LPL will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in Program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay Advisor the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using the management services of Advisor and by making their own investment decisions.
- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.
- Although only no-load and load-waived mutual funds can be purchased in a program account, client should understand that some mutual funds pay asset based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.
- If client holds a variable annuity as part of an account, there are mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor.

Further information regarding fees assessed by a mutual fund, or variable annuity is available in the appropriate prospectus, which is available upon request from the Advisor or from the product sponsor directly.

#### **D. Other Important Considerations**

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.
- The advisory fee also may cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.
- The Advisor recommending the program to the client receives compensation as a result of the client's participation in the program. This compensation includes the advisory fee and also may include other compensation, such as bonuses, awards or other things of value offered by LPL to the Advisor or its associated persons. The amount of this compensation may be more or less than what the Advisor would receive if the client participated in other LPL programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, the Advisor may have a financial incentive to recommend a program account over other programs and services.
- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers or other investment firms not affiliated with Advisor.

#### **ITEM 5 - ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS**

Goof Life does not impose a minimum account value (quantity of assets under management) or a minimum annual fee to participate in the Program.

The Program is available to individuals and families, business entities, trusts, estates and charitable organizations.

## **ITEM 6 - PORTFOLIO MANAGER SELECTION AND EVALUATION**

### **A. Portfolio Manager Selection.**

In the Program, Good Life does not select, review or recommend other investment advisors or portfolio managers. The Advisor, through its Representatives, is responsible for the investment advice and management offered to clients. For more information about the Good Life Representative(s) managing a client's the account, the client should refer to the Brochure Supplement for the Representative(s) responsible for the client's account, which the client should have received along with this Brochure at the time client opened the account.

LPL performs certain administrative services for the Advisor, including generation of quarterly performance reports for program accounts. Client will receive an individual quarterly performance report, which provides performance information on a time weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

### **B. Performance-Based Fees & Side-By-Side Management**

Good Life does not manage advisory assets on a performance fee basis, meaning our fees are not based on a share of capital gains or capital appreciation.

### **C. Methods of Analysis and Investment Strategies**

In the management of the program, Good Life may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical - (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical - (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

Good Life may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)



- Trading (securities bought and sold within thirty (30) days)

#### **D. Risk Management**

Effective risk management is a critical factor in achieving investment performance. At the inception of a client relationship with Good Life, our Representatives discuss with and advise each client on the amount of risk that is appropriate for the client based on the client's investment objectives, financial circumstances, age, and other factors identified during the Representative's consultations with the client. In order to effectively manage client risk when managing a client's investment portfolio our Representatives focus on making asset allocation decisions based a client's defined investment objectives and risk profile. During the investment management process our Representatives continue to track a client's portfolio to ensure that it stays within its allocation guidelines, and appropriate adjustments are made as needed.

Good Life does not believe that our methods of analysis and the investment strategies we employ present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis, Good Life must have access to current/new market information. Good Life has no control over the dissemination rate of market information; therefore, unbeknownst to us, certain analyses may be compiled with outdated market information, severely limiting the value of our analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Good Life's primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period involves a very short investment time period, but will incur higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Good Life will be profitable or achieve any specific level of performance.

## **E. ETFs & Mutual Funds**

Currently, Good Life primarily allocates client investment assets among various individual equity and fixed income securities, mutual funds and/or exchange traded funds (“ETFs”) (including inverse ETFs and/or mutual funds that are designed to perform in an inverse relationship to certain market indices), on a discretionary and non-discretionary basis in accordance with the client’s designated investment objectives and risk tolerances.

As disclosed above, Good Life may utilize leveraged long and short mutual funds and/or ETFs that are designed to perform in either an:

- inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and
- enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market.

There can be no assurance that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct Good Life, in writing, not to employ any or all such strategies for that client’s accounts.

**Investing in securities involves the risk of loss that clients should be prepared to bear.**

## **F. Voting Client Securities**

When a Good Life Investment Advisory Agreement is executed by each client, the client must elect to either vote their own proxies, or have Good Life vote proxies for the client for all securities held in the client’s accounts managed by Good Life.

Clients who elect to vote their own proxies should instruct their respective custodian to forward directly to the client, copies of all proxies and shareholder communications received in connection with their investment assets. Good Life shall have no responsibility for voting such proxies or corporate actions. However, even though a client may have elected to vote their own proxies, clients can contact Good Life with questions about a particular solicitation, and we will attempt to assist the client in making a decision in regard to the solicitation, and if we perceive a conflict may exist, we will disclose the conflict. Any questions regarding a particular solicitation should be directed by the client to the Good Life Representative responsible for the client’s account.

In connection with clients that elect to have us vote their proxies, Good Life, as a matter of policy and as a fiduciary to our clients, has responsibility for voting proxies for client account securities consistent with the best economic interests of the client. We maintain written policies and procedures as to the handling, research, voting and reporting of proxy voting and

making appropriate disclosures about our proxy voting policies and practices. Our policies and practices includes the responsibility to monitor corporate actions, receiving and voting client proxies and the disclosure of any potential conflicts of interest, as well as making information available to clients about the voting of proxies for their accounts and maintaining relevant and required records.

#### **ITEM 7 - CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS**

In the Program, Good Life is responsible for account management. There is no separate or outside portfolio manager involved. The Advisor obtains the necessary financial data from the client and assists the client in setting an appropriate investment objective for the account. The Advisor obtains this information by having the client complete an advisory agreement and other documentation. Clients are encouraged to contact the Advisor if there have been any changes in the client's financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Client should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Client should further be aware that achievement of the stated investment objective is a long-term goal for the account.

#### **ITEM 8 - CLIENT CONTACT WITH PORTFOLIO MANAGERS**

Good Life's Program clients are encouraged to contact us and the Representative responsible for the client's account at any time with questions regarding program account.

#### **ITEM 9 - ADDITIONAL INFORMATION**

##### **A. Disciplinary Information**

Neither Good Life, nor any of its Representatives, has any legal and/or disciplinary events to disclose

##### **B. Other Financial Industry Activities and Affiliations**

The Advisor is only in the business of providing investment advice. However, the Representatives of the Advisor are separately licensed as registered representatives through LPL. In this capacity, the Representatives can sell securities to clients and receive normal and customary compensation in the form of commissions.

In addition to their registration with LPL, Good Life discloses the following additional relationships:

- Licensed Insurance Agents. Good Life's Representatives, in their individual capacities, are licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Good Life's

Representatives to purchase insurance products on a commission basis. The recommendation by our Representatives that a client purchase a securities and/or insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Good Life's Representatives. Clients are reminded that they may purchase investment products recommended by Good Life through other, non-affiliated broker dealers or insurance agents.

- Accountants & Certified Public Accountants. Certain Good Life Representatives are accountants and Certified Public Accountants. To the extent that these Representatives provide accounting services, which may include tax advice, to any clients, including clients of Good Life, all such services shall be performed by those Representatives, in their individual professional capacities, independent of Good Life, for which services Good Life shall not receive any portion of the fees charged by the Representative in his or her individual capacity, referral or otherwise. It is expected that these Representatives, solely incidental to their practices as accountants, may recommend Good Life's services to certain of their clients. No client of Good Life is under any obligation to use the accounting services of these representatives.

**Good Life's Chief Compliance Officer, Richard Gromis, is available to address any questions a prospective client or client may have regarding the above arrangements and any corresponding perceived conflict of interest any such arrangement may create.**

### **C. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

(1) Code of Ethics. Good Life has implemented a Code of Ethics (the "Code") that is available to existing and potential clients upon request. We place great emphasis on complying with all applicable laws and regulations governing our practices as a Registered Investment Adviser. Therefore, we have established firm guidelines related to the professional standards of conduct for our employees, which emphasizes the protection of client interests at all times and demonstrates our commitment to our fiduciary duties of honesty, good faith, and fair dealing with clients. All of our employees are expected to adhere strictly to the guidelines outlined in the Code, which requires our employees to submit personal securities transactions and holdings reports to us that are to be reviewed by our Chief Compliance Officer on a periodic basis. Employees are encouraged to report any violations of the Code to our Chief Compliance Officer. Additionally, we maintain and enforce written policies that are reasonably designed to prevent the misuse or dissemination of any material non-public information about our clients or their account holdings by us or any of our employees.

(2) Interest in Client Transactions & Personal Trading. Good Life and/or our Representatives may buy or sell securities that are also recommended to clients. This practice may create a situation where Good Life and/or our Representatives are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation

creates a potential conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Good Life did not have adequate policies in place to detect such activities. In addition, Good Life’s established policies can help detect insider trading, “front-running” (i.e., personal trades executed prior to those of Good Life’s clients) and other potentially abusive practices.

Good Life has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Good Life’s “Access Persons.” Good Life’s securities transaction policy requires that an Access Person of Good Life must provide the Chief Compliance Officer 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 with a written report of the Access Person’s current securities holdings at least once each twelve (12) month period thereafter on a date Good Life selects.

Good Life and/or our Representatives may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Good Life and/or our Representatives are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above Good Life has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each Good Life’s Access Persons.

Good Life does not engage in principal transactions with its clients in Program accounts.

**(3) Privacy Policy.** Good Life places significant focus on protecting our client’s private information in accordance with the requirements of the Gramm-Leach-Bliley Act. To protect client information, we have implemented policies and procedures which insure that client information is kept private and secure.

We do not disclose any non-public personal information about clients or former clients to any non-affiliated third parties, except as permitted by law. In the course of servicing our client’s accounts, we may share some client information with certain service providers, such as transfer agents, custodians, broker-dealers, accountants, and lawyers.

We restrict internal access to non-public personal information about clients to employees only on a “need-to-know” basis that is necessary to facilitate our capability to provide clients with products or services. We have a strict policy which prohibits selling information about current or former customers or their accounts to anyone. It is also our policy not to share client information unless required to process a transaction, at the request of a client, or as required by law.

A copy of our privacy policy notice is provided to each client prior to, or contemporaneously with, the execution of the advisory agreement, and, thereafter, we will deliver a copy of our current privacy policy notice to our clients on an annual basis.

A copy of Advisor's Code of Ethics is available to clients or prospective clients upon request by contacting Richard Gromis, Chief Compliance Officer at 610-898-6927.

#### **D. Review of Accounts**

(1) **Frequency & Nature of Periodic Reviews.** For all Program accounts, our portfolio managers will monitor your account on a continuous basis and will conduct a formal review of your account(s) on at least a quarterly basis.

(2) **Factors That Trigger a Non-Periodic Review of Client Accounts.** In addition, factors may develop that will cause us to conduct additional and more frequent reviews. These factors may include, but are not limited to, significant market volatility, changes in the client's investment objectives, or significant restructuring of your portfolios.

Clients are advised that it remains their responsibility to inform us of any changes in their investment objectives and/or financial situation. Clients are encouraged to comprehensively review financial planning issues, investment objectives and account performance with us at least on an annual basis.

(3) **Reports to Program Clients.** During any month that there is activity in a client's Program account, the client will receive a monthly account statement from LPL showing account activity as well as positions held in the account at month end. Additionally, client will receive a confirmation of each transaction that occurs within the program account unless the transaction is the result of a systematic purchase, redemption or exchange. Client will also receive a detailed quarterly report showing performance, positions and activity from LPL.

(4) **Additional Information & Reports.** In addition, Program accounts are subjected to a risk based exception reporting system that flags accounts on a quarterly basis for criteria such as performance, trading activity, and concentration. The exception reporting identifies accounts where additional scrutiny or analysis by Advisor may be appropriate.

#### **E. Client Referrals & Other Compensation**

(1) **Economic Benefits Provided by Third Parties.** Good Life may receive an indirect economic benefit from LPL Financial. Good Life, without cost (and/or at a discount), may receive support services and/or products from LPL Financial. However, Good Life's clients do not pay more for investment transactions effected and/or assets maintained at LPL Financial as a result of this arrangement. There is no corresponding commitment made by Good Life to LPL Financial or any other entity to invest any specific amount or percentage of client assets in

any specific mutual funds, securities or other investment products as a result of the above arrangement.

(a) **Custody**. LPL is the qualified custodian and maintains custody of client funds and securities in a separate account for each client under the client's name. LPL as a qualified custodian sends account statements showing all transactions, positions, and all deposits and withdrawals of principal and income. LPL sends account statements monthly when the account has had activity or quarterly if there has been no activity. Clients should carefully review those account statements.

Although most securities available in program accounts are custodied at LPL, there are certain securities managed as part of the account that are held at third parties, and not at LPL. For example, variable annuities, hedge funds and managed futures are often held directly with the investment sponsor. For those outside positions, client will receive confirmations and statements directly from the investment sponsor.

For outside positions not custodied at LPL, LPL may receive information (e.g., number of shares held and market value) from the investment sponsor and display that information on statements and reports prepared by LPL. Such information also may be used to calculate performance in performance reports prepared by LPL. Although Advisor believes that the information provided by LPL is accurate, Advisor recommends that clients refer to the statements and reports received directly from the investment sponsor and compare them with the information provided in any statements or reports from LPL. The statements and reports provided by LPL with respect to outside positions should not replace the statements and reports received directly from the investment sponsor.

(b) **Brokerage Practices**. In the Program, the Advisor requires that clients direct LPL as the sole and exclusive broker-dealer to execute transactions in the account. LPL is not paid a commission for executing transactions. Because associated persons of the Advisor are licensed with LPL, this presents a conflict of interest. Clients should understand that not all advisors require their clients to direct brokerage. By directing brokerage to LPL, clients may be unable to achieve the most favorable execution of client transactions. Therefore, directed brokerage may cost clients more money.

Advisor may receive support services and/or products from LPL, which assist the Advisor to better monitor and service program accounts maintained at LPL. These support services and/or products may be received without cost, at a discount, and/or at another negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services

- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products used by Advisor in furtherance of its investment advisory business operations

Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Advisor to LPL or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement.

(i) **Aggregation & Allocation of Transactions.** Although each client's portfolio accounts are individually managed, we may purchase or sell the same securities at the same time for multiple clients. When this occurs it is often advantageous to aggregate the securities of multiple clients into one trading block for execution. If your portfolio securities are purchased or sold in an aggregated transaction with the securities of other clients, you will all receive the same execution price, and if the aggregated purchase or sale involves several executions to complete the transaction, you will all receive the average price paid or received on the aggregated transaction.

**(2) Compensation to Non-Advisory Personnel for Client Solicitation or Referrals.**

(a) **Referrals to Good Life.** If a client, including a Program client, is introduced to Good Life by either an unaffiliated or an affiliated solicitor, Good Life may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940 ("Advisers Act"), and any corresponding state securities law requirements. Any such referral fee shall be paid solely from Good Life's investment advisory fee, and shall not result in any additional charge to the client. If the client is introduced to good Life by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose to the prospective client the nature of his/her/its solicitor relationship with Good Life, and shall provide each prospective client with a copy of Good Life's Brochure along with a copy of the written disclosure statement from the solicitor to the prospective client disclosing the terms of the solicitation arrangement between Good Life and the solicitor, including the compensation to be received by the solicitor from Good Life.

(b) **Referrals by Good Life.** If Good Life or a Representative introduces a client to another investment advisor or an investment manager, Good Life may be paid a referral or solicitor fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act, and any corresponding state securities law requirements. Any such referral fee shall be paid according to a fee disclosure statement provided to the client at the time that the referral is made. When Good Life is acting as an unaffiliated solicitor, Good Life, at the time of the solicitation, shall disclose the nature of its solicitor relationship, and shall provide each client being solicited with a copy of the written disclosure statement disclosing the terms of the solicitation arrangement between the Good Life and the investment advisor or investment



manager, including the compensation to be received by Good Life, and a copy of the Brochure of the investment advisor or investment manager being referred to the client.

#### **F. Financial Information**

(1) **Balance Sheet**. Good Life is not required to attach a balance sheet for our most recent fiscal year because we do not require the prepayment of more than \$1,200 in fees per client, six months or more in advance.

(2) **Financial Condition**. Good Life is not aware of any financial condition that would impair our ability to meet our contractual commitments to our clients.

(3) **Bankruptcy Petitions in Previous Ten Years**. Good Life has not been subject of a bankruptcy petition in the last ten years.