

**Part 2A, Appendix 1**

***Item 1 - Cover Page***

**ENRICH FINANCIAL PARTNERS LLC**

FORM ADV – PART 2A APPENDIX 1 INFORMATION  
May 5, 2016

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**This Wrap Fee Program Brochure provides information about the qualifications and business practices of EnRich Financial Partners LLC (“EnRich”). If you have any questions about the contents of this Brochure, please contact us at (608) 275-3442. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.**

**Additional information about EnRich, including a copy of its Form ADV Part 1, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

*EnRich is a registered investment adviser. Registration of an investment adviser does not imply any certain level of skill or training.*

***Item 2 - Material Changes To This Brochure Since Its Last Annual Update.***

There have been no material changes made to this ADV Part 2A Brochure since the most recent annual update filing on March 31, 2015.

**ANY QUESTIONS: EnRich Financial Partners' Chief Compliance Officer, Christopher Rich, remains available to address any questions that an existing or prospective client may have regarding this Brochure.**

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#### ***Item 4 - Services, Fees and Compensation***

EnRich Financial Partners LLC ("EnRich") is an SEC registered investment adviser which makes comprehensive financial consulting and analysis, portfolio management, financial coaching and manager search and monitoring services available to a wide variety of clients. EnRich has been in business since 2003 and is owned by Elaine Beckett Rich and Christopher D. Rich. EnRich is not under common control with any other firm, nor does it control any other firm.

This brochure discusses EnRich's portfolio management services that are offered on a "wrap" fee basis. If a client determines to engage EnRich on a wrap fee basis the client will pay a single fee for bundled services (i.e. investment advisory, brokerage, custody). The services included in a wrap fee agreement will depend upon each client's particular need.

##### ***A. Portfolio Management Services***

Portfolio Management Services offered by EnRich allow clients to maintain an account consisting of mutual funds and other equity and debt securities. EnRich may also recommend exchange-traded funds ("ETF"), when suitable for the client.

When opening an account, the Representative will obtain financial data from the client and assist the client in determining investment objectives and restrictions. The Representative will regularly monitor the account and make investment strategy recommendations based on the specific needs and investment goals of the client.

EnRich shall be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in the written agreement between each client and EnRich. Clients may change/amend these limitations, in writing, at any time. The client shall have reasonable access to one of EnRich's investment professionals to discuss their account.

Portfolio Management Services generally include the following: 1) Establishment of investment objectives, consistent with the client's risk tolerance, financial needs and goals; 2) Establishment of asset allocation mix based on the client's financial position, cash flow, risk preferences and time horizon; 3) Set up of accounts; 4) Transfer of assets to a custodian; 5) Implementation of all trades and account management; 6) Preparation of quarterly performance reports on all accounts; and 7) Periodic review meetings to update the client's ongoing financial planning and investment progress. In some cases, EnRich may contract with third parties to provide certain reports or use those provided by the mutual funds and other securities.

Accounts are generally maintained by a separate custodian. Generally, TD Ameritrade ("TD Ameritrade") shall serve as the custodian for Program accounts.

All clients in the Portfolio Management Service receive quarterly performance reports from EnRich, which set forth the following information:

1. Performance history (net of fees)
2. Portfolio composition (percentage weighting of each asset class)
3. Portfolio inception date with initial value
4. Net additions/withdrawals
5. Quarter end portfolio value
6. Time weighted return and comparison rates of other standard indices
7. Portfolio listing of holdings

Fees for the Portfolio Management Services are calculated based on the following schedule. Fees cover EnRich's advisory fee and most transaction costs, as described below.

<u>Market Value of Client Assets Under Management</u>	<u>Annual Fee*</u>	<u>Negotiated Annual Fee</u>
First \$500,000	1.50%	1.10%
Next \$500,000	1.10%	0.80%
Next \$4,000,000	0.70%	0.60%
Next \$5,000,000	0.50%	0.40%
Next \$10,000,000	0.50%	0.30%
Amounts over \$20,000,000	0.50%	0.25%

\* This fee may be negotiated.

**Fee Calculation:** The fee charged is calculated as described below and is not charged on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client, pursuant to Section 205(a)(1) of the Investment Advisers Act of 1940, as amended (hereinafter the "Act").

**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.

**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

## Important Disclosures

**Investment Performance:** As a condition to participating in the Program, the participant must accept that past performance may not be indicative of future results, and understand that the future performance of any specific investment or investment strategy (including the investments and/or investment strategies purchased and/or undertaken by EnRich) may not: (1) achieve their intended objective; (2) be profitable; or, (3) equal historical performance level(s) or any other performance level(s).

**Limitations of Financial Planning and Non-Investment Consulting/Implementation Services.** As indicated above, to the extent requested by a client, EnRich may provide financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. EnRich **does not** serve as an attorney or accountant, and no portion of its services should be construed as legal or accounting services. Accordingly, EnRich **does not** prepare estate planning documents or tax returns. To the extent requested by a client, EnRich may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance agents, etc.), including representatives of EnRich in their separate individual capacities as licensed insurance agents. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from EnRich and/or its representatives.

**Please Note:** If the client engages any recommended unaffiliated professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note-Conflict of Interest:** The recommendation by EnRich's representative that a client purchase an insurance commission product through EnRich's representative in his/her separate and individual capacity as an insurance agent, presents a **conflict of interest**, as the receipt of commissions may provide an incentive to recommend investment or insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any securities or insurance commission products through such a representative. Clients are reminded that they may purchase securities and insurance products recommended by EnRich through other, non-affiliated broker-dealers or insurance agents.

**Retirement Plan Rollovers-No Obligation/Conflict of Interest.** A client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in his/her former employer's plan, if permitted, (ii) roll over the assets to his/her new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). EnRich may recommend an investor roll over plan assets to an IRA managed by EnRich. As a result EnRich and its representatives may earn an asset-based fee. In contrast, a recommendation that a client or prospective client leave his/her plan assets with his/her former employer or roll the assets to a plan sponsored by a new employer will generally result in no compensation to EnRich (unless the client engages EnRich to monitor and/or manage the account while maintained at the client's employer). EnRich has an economic incentive to encourage a client to roll plan assets into an IRA that EnRich will manage **or** to engage EnRich to monitor and/or manage the account while maintained at the client's employer. There are various factors that EnRich may consider before recommending a rollover, including but not limited to: (i) the investment options available in the plan versus the investment options available in an IRA, (ii) fees and expenses in the plan versus the fees and expenses in an IRA, (iii) the services and responsiveness of the plan's investment professionals versus EnRich's, (iv) protection of assets from creditors and legal judgments,

(v) required minimum distributions and age considerations, and (vi) employer stock tax consequences, if any. No client is under any obligation to roll over plan assets to an IRA managed by EnRich or to engage EnRich to monitor and/or manage the account while maintained at the client's employer.

**Use of Mutual Funds.** While EnRich may recommend allocating investment assets to mutual funds that are not available directly to the public, EnRich may also recommend that clients allocate investment assets to publically-available mutual funds that the client could obtain without engaging EnRich as an investment advisor. However, if a client or prospective client determines to allocate investment assets to publically-available mutual funds without engaging EnRich as an investment adviser, the client or prospective client would not receive the benefit of EnRich's initial and ongoing investment advisory services.

**eMoney Advisor Platform.** EnRich may provide its clients with access to an online platform hosted by "eMoney Advisor" ("eMoney"). The eMoney platform allows a client to view his/her/its complete asset allocation, including those assets that EnRich does not manage (the "Excluded Assets"). EnRich does not provide investment management, monitoring, or implementation services for the Excluded Assets. Therefore, EnRich shall not be responsible for the investment performance of the Excluded Assets. Rather, the client and their advisor(s) that maintain management authority for the Excluded Assets, and not EnRich, shall be exclusively responsible for such investment performance. The client may choose to engage EnRich to manage some or all of the Excluded Assets pursuant to the terms and conditions of an *Investment Advisory Agreement* between EnRich and the client. The eMoney platform also provides access to other types of information, including financial planning concepts, which should not, in any manner whatsoever, be construed as services, advice, or recommendations provided by EnRich. Finally, EnRich shall not be held responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without EnRich' assistance or oversight.

**Please Note: Cash Positions.** At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur) EnRich may maintain cash positions for defensive purposes. All cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating EnRich's advisory fee.

**Client Obligations.** In performing its services, EnRich shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains their responsibility to promptly notify EnRich if there is ever any change in their financial situation or investment objectives for the purpose of reviewing, evaluating, or revising EnRich's previous recommendations or services.

**Disclosure Statement.** A copy of EnRich's written Brochure as set forth on Part 2 of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of Partnership Advisory Services Agreement

Participation in the Program may cost more or less than purchasing such services separately. Also the Program fee charged by EnRich for participation in the Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs.

Depending upon the percentage wrap-fee charged by EnRich, the amount of portfolio activity in the

client's account, and the value of custodial and other services provided, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately and/or if EnRich were to negotiate transaction fees and seek best price and execution of transactions for the client's account.

**Wrap Program-Conflict of Interest.** Under EnRich's wrap program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. **Conflict of Interest.** Because wrap program transaction fees and/or commissions are being paid by EnRich to the account custodian/broker-dealer, EnRich could have an economic incentive to minimize the number of trades in the client's account.

The fee covers all transaction costs except for: transaction costs agreed to be paid by the client; costs for transactions placed by a third-party manager; mark-ups and mark-downs; costs for transactions ordered by a client; and costs on transactions occurring after notice of agreement termination is given, odd lot differentials, IRA maintenance fees, exchange fees, interest charges, American Depository Receipt agency processing fees, and any charges, taxes or other fees mandated by any federal, state or other applicable law or otherwise agreed to with regard to client accounts. Such fees and expenses are in addition to the Program's wrap fee.

Clients and prospective clients should be aware that sale transactions in certain mutual funds made shortly after the purchase of the fund may result in a fee or short-term trading penalty in a client's account. Short-term sales may, for example, occur when a newly-established fund position in a client's account is batched with sale orders in the same fund for other client accounts for the purpose of rebalancing the account positions in that fund. These amounts are charged by the mutual fund directly and may, at the discretion of EnRich, be covered by EnRich.

Clients may terminate the agreement for any service at any time in its entirety by giving EnRich a written notice of termination.

EnRich's related persons who recommend the Program to clients do not receive compensation as a result of a client's participation in the wrap fee program.

#### ***Item 5 - Account Requirements and Types of Clients***

For portfolios supervised on a continuous, discretionary basis, EnRich generally imposes an initial minimum asset value of \$250,000. However, the minimum can be waived by EnRich depending upon the type of account, kind of securities in the account, dollar value of securities, projected nature of trading and other services for the account, and the amount of work necessary to manage the account.

EnRich makes its advisory services available to a wide variety of clients including, but not limited to, individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.



## ***Item 6 - Portfolio Manager Selection***

### **Third-Party Managers**

Third-party managers are not used in this wrap program. These services are provided by certain select Representatives of EnRich.

### **Related Managers**

Only EnRich Representatives act as portfolio managers. Inasmuch as the execution costs for transactions effected in the client account will be paid by EnRich, a potential conflict of interest arises in that EnRich may have a disincentive to trade securities in the client account. In addition, the amount of compensation received by EnRich as a result of the client's participation in the Program may be more than what EnRich would receive if the client paid separately for investment advice, brokerage and other services.

#### ***A. Advisory Business Services***

In addition to the Portfolio Management Services offered on a wrap fee basis, EnRich may also be engaged to provide the following services:

#### **Strategic Partnership Services**

Strategic Partnership Services offered by EnRich can include any combination of the following topics, as agreed on between EnRich and the client:

- Investment Consulting - is an analysis of current investments and expected new ownership or sale of investments and recommendations of an investment allocation designed to meet the client's goals.
- Retirement Funding and Income Analysis - is an analysis of retirement needs of the client. EnRich reviews existing designated retirement accounts. We estimate the retirement income and expenses at various ages, establish savings, investment and investment budgets designed to meet retirement goals.
- Education Funding Analysis - is an analysis of the projected amount needed to fund education of children or grandchildren. We establish savings and investment budgets designed to meet funding goals.
- Life Insurance Needs Analysis - is an analysis to determine recommended coverage amounts and benefits and costs of existing policies. We recommend changes as necessary in policy coverage over time to meet the client's financial needs.
- Disability Insurance Needs Analysis - is an analysis to review existing or proposed disability insurance coverage with the client in relation to the client's expected wage and income needs during disability. We assist with locating an insurer if necessary.

#### **Financial Coaching Services**

EnRich may also offer Financial Coaching Services which are designed to assist the client in making financial decisions and achieving peace of mind. The scope of the engagement is defined individually based upon client needs. This service may or may not include a written analysis, and may not be

comprehensive. "Specific Analysis" entails performing a specific analysis of individual assets such as stocks, bonds, mutual funds, annuities, life insurance and health insurance policies. The service may also include assisting employers and/or employees in providing advice on the types of investment plans and the selection of various types of investments within a plan. Advice may also be provided concerning the management of death proceeds from life insurance policies and the distribution from profit sharing plans and/or retirement plans or any other analysis requested by the client.

*Performance Based Fees and Side-by-Side Management.*

EnRich does not charge any performance- based fees. All fees are disclosed above.

*Methods of Analysis, Investment Strategies and Risk of Loss.*

EnRich's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon its historical and projected financial performance).

EnRich and the EnRich Representatives use research material provided by third parties, including security analysts, non-affiliated investment management firms, economists, investment advisors, and rating services such as Morningstar. The representatives attend conferences and teleconferences with investment managers, and investment manager representatives.

**Please Note: Investment Risk.** Investing in securities involves risk of loss that clients should be prepared to bear. 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 EnRich) will be profitable or equal any specific performance level(s).

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

EnRich's primary investment strategy - Long Term Purchases- is a fundamental investment strategy. 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.

EnRich and the EnRich Representatives use research materials provided by others, including security analysis, investment management firms, economists, investment advisors, and rating services such as Morningstar, and they attend conferences and teleconferences with investment managers, and investment manager representatives.

EnRich does not guarantee the results of the advice given. Thus, significant losses can occur by

investing in any security, or by following any strategy, including those recommended or applied by EnRich.

*Voting Client Securities.*

EnRich and its Representatives do not vote proxies on behalf of clients. The custodian of a client's account will forward all proxy requests directly to the client, without notice to EnRich, though it cannot provide legal advice.

EnRich also does not take any action on legal notices it or a client may receive from issuers of securities held in a client's managed account. Any such notices are forwarded to the client. However, EnRich is available to answer questions regarding such notices.

***Item 7 - Client Information Provided to Portfolio Managers***

Because third-party managers are not used in the program, no third-party manager will require information from a client. However, prior to account opening, all new clients are asked for background information and are asked for complete an investment policy statement.

***Item 8 - Client Contact With Portfolio Managers***

Clients are free to contact their EnRich portfolio manager at any time.

***Item 9 - Additional Information***

A. *Disciplinary Information and Affiliations*

EnRich does not have any disciplinary information to report regarding itself or any of its counselors or other related persons other than the following.

B. *Other Financial Industry Activities and Affiliations.*

**Licensed Insurance Agents.** Certain of EnRich'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 certain of EnRich's representatives to purchase insurance products on a commission basis.

The recommendation by EnRich's representatives that a client purchase insurance commission products 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 insurance products from EnRich's representatives. Clients are reminded that they may purchase insurance products recommended by

EnRich through other, non-affiliated insurance agents.

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

When EnRich Representatives make recommendations for the purchase of insurance, they also receive customary commissions as insurance representatives. The receipt of commissions in return for insurance product purchases creates a conflict of interest for Representatives when they recommend the purchase of such products to clients. Representatives of EnRich may buy or sell securities for themselves that they also recommend to clients. Where a transaction for a Representative, or an account related to a Representative, is contemplated, a client's transaction is given priority. EnRich has developed a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts.

Designed to prevent conflicts of interest between the financial interests of clients and the interests of the firm's staff, the Code requires, among other procedures, such "access persons to obtain preapproval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at the firm to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for clients' accounts. The Code also established certain bookkeeping requirements relating to federal reporting rules. The Code is required to be reviewed annually and updated as necessary. A complete copy of the firm's Code is available upon request.

*Review of Accounts and Reports.*

EnRich Representatives review quarterly portfolio reports provided to clients on a quarterly basis, or more frequently if requested by a client. Each is a Certified Financial Planner Practitioner (CFP®).

EnRich Representatives provide each client with a review of the client's financial situation as frequently as they deem necessary. This review includes goals and assumptions, financial statements, cash flow and taxes, investments, retirement projections, insurance, estate and general financial planning.

Managed investment accounts are reviewed quarterly or more frequently as contributions and economic situations change.

All clients receiving Portfolio Management Services receive quarterly portfolio performance reports from EnRich which provide clients with: (1) Performance history, net of fees; (2) Portfolio composition - percentage weighting of each asset class; (3) Portfolio inception date with initial value; (4) Net additions/withdrawals; (5) Quarter end portfolio value; (6) Time weighted return and comparison rates of return of other standard indices; and (7) Listing of portfolio holdings.

A statement showing the market value of the securities in a client's account is sent monthly or quarterly by the investment company that holds the client's investments. EnRich prepares detailed quarterly reports showing objectives, asset allocation, and appraisals for managed investment accounts.

Summaries are prepared at the request of financial planning clients.

Clients receiving consulting services receive reports in the frequency and scope specified the Services Agreement.

*Client Referrals and Other Compensation.*

EnRich does not currently have any client referral relationships. Thus, it does not pay any fee to a third party for making client referrals to it.

EnRich does recommend clients use the custodial and brokerage transaction services of TD Ameritrade.

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

Clients should be aware that there is no direct link between EnRich’s participation in the TD Ameritrade program and the investment advice it gives to its clients, although EnRich receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk servicing advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to EnRich by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by EnRich’s related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for EnRich’s personnel to attend conferences or meetings relating to the program or to TD Ameritrade’s advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the program may benefit EnRich but may not benefit its client accounts. These products or services may assist EnRich in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help EnRich manage and further develop its business enterprise. The benefits received by EnRich through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by EnRich or its related persons in and of itself creates a potential conflict of interest and may indirectly influence EnRich’s recommendation of TD Ameritrade for custody and brokerage services.

EnRich also receives from TD Ameritrade certain additional economic benefits (“Additional Services”) that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the Additional Services include the annual fees for payment of the Morningstar Workstation (\$2,282.50) and the Advent Axys (\$2,717.50).

TD Ameritrade provides the Additional Services to EnRich in its sole discretion and at its own expense, and EnRich does not pay any fees to TD Ameritrade for the Additional Services. EnRich and TD Ameritrade have entered into a separate agreement (“Additional Services Addendum”) to govern the terms of the provision of the Additional Services.

EnRich’s receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to EnRich, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, EnRich’s client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with EnRich, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, EnRich may have an incentive to recommend to its clients that the assets under management by EnRich be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. EnRich’s receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.

The custodians recommended by EnRich, other than TD Ameritrade, may also, among other services, carry client accounts on their records, process transactions ordered by EnRich, provide computer access to EnRich for client positions and provide quotes and data needed by EnRich for its reports to clients.

These services are provided to EnRich at minimal or no cost. EnRich believes that use of the recommended firm(s) is a convenient means of obtaining efficient transaction executions, account data and reporting services for securities positions. However, receipt of such services at minimal or no cost also creates an inducement and conflict of interest for EnRich since referring clients to any other firm(s) may result in higher reporting and overhead costs to EnRich.

Thus, the receipt of these services creates an incentive and conflict of interest for EnRich when it recommends TD Ameritrade services.

Other than the services described above, EnRich and its Representatives do not direct transactions and the commissions they generate (soft dollars) to brokerage firms or other parties to receive research or other benefits.

EnRich and its Representatives are also licensed to offer insurance products and will receive customary commissions for the sale of such products should a client decide to make purchases or sales through EnRich and the Representatives which are not covered by the wrap fee. When selling these products, a conflict of interest exists. Both load and no-load funds may be recommended.

### *C. Financial Information.*

EnRich does not receive fees of more than \$1,200 six months or more in advance, thus no financial statement for EnRich is attached. EnRich does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.