

Registered as JCG Consulting, Inc.  
Doing Business as: millionaireME wealth management



millionaire  
ME  
wealth management

5 West Mendenhall Street  
Bozeman, MT 59715

December 21, 2018

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of millionaireME wealth management (“the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (406) 233-6361 or [jcg@MYmillionaireMe.com](mailto:jcg@MYmillionaireMe.com).

millionaireME wealth management is an internet only SEC registered investment advisor. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about millionaireME wealth management to assist you in determining whether to retain the Advisor. Additional information about millionaireME wealth management and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD number 299970.

## **Item 2 – Material Changes**

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If the firm amends this brochure so that it contains material changes from the last annual update, the changes will be identified in this item.

Clients will receive, at no charge, a summary of any material changes within 120 days of December 31<sup>st</sup> and promptly (generally within 30 days) after any material changes throughout the year.

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#### **Item 4 – Advisory Business**

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millionaireME wealth management is an internet only investment advisor. The firm was registered in 2019 and provides a risk-based discretionary platform of no transaction fee Mutual Funds and Exchange Traded Funds (ETFs) primary to individuals and high net worth individuals through CLS Investments, LLC (CLS). CLS acts as a sub-advisor, investment research provider and portfolio overlay manager to provide customized offerings, investment options, and technology tools to clients of millionaireME.

Jon C. Goodman is the Founder, CEO and Chief Compliance Officer as well as an Investment Advisor Representative (IAR) with over 10 years of experience. He holds the Certified Private Wealth Advisor<sup>®</sup> (CPWA<sup>®</sup>) designation from the Investment Management Consultants Association (IMCA) offered in conjunction with the University of Chicago Booth School of Business and earned his B.A. in English from Duke University.

Mr. Goodman also holds a Master of Arts in Liberal Studies (MALS) in Religious Studies from Georgetown University, an Online Writing Certificate from Stanford University, and his FINRA Series 7, 66 licenses. Mr. Goodman is also a licensed insurance agent.

- millionaireME wealth management does not provide accounting or legal advice. Clients should seek the advice of legal counsel or an accountant regarding the tax or legal implications of an investment or trading strategy.
- millionaireME does not directly hold securities or have direct access to client assets. The firm has a custodial relationship with TD Ameritrade, Inc (TD Ameritrade) for the safekeeping of client assets. More specifically, millionaireME wealth management participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc., member FINRA/SIPC. TD Ameritrade is an independent SEC-registered broker-dealer.
  - TD Ameritrade and millionaireME wealth management are separate and unaffiliated legal entities.
  - TD Ameritrade offers services to independently registered investment advisers which include custody of securities, trade execution, and clearance and settlement of transactions.

#### **Conflicts of Interest**

millionaireME wealth management must fully disclose all material facts concerning any conflict of interest and must abide by honest and ethical business practices.

- Jon C. Goodman is an investment advisor representative of millionaireME and also JCG Advisors, LLC (CRD No. 283746). JCG Advisors, LLC provides comprehensive asset management and financial planning that is not exclusive to the internet. Both firms are owned and operated by Mr. Goodman.
- Jon C. Goodman is the only Investment Advisor Representative and serves as the Chief Compliance Officer for both millionaireME wealth management and JCG Advisors, LLC.

- Jon C. Goodman owns and operates an investment realted App “millionaireME” that is designed to calculate the potential investment value of the price difference between competing consumer goods.
- Jon C. Goodman is the Managing Partner and insurance agent of JCG Life/Health/DI (“JCG Life”). He is appointed with multiple insurance carriers to sell insurance products for a commission.
- Jon C. Goodman is the Managing Member of JCG CTA, LLC (“JCG CTA”). JCG CTA is exempt from registration as a commodity trading adviser with the National Futures Association (“NFA”) and is currently not involved in trading futures. Clients of JCG RIA are not solicited to trade futures through JCG CTA.
- Product sponsors may pay or reimburse millionaireME wealth management for the costs associated with, education or training events.

Such conflicts of interest are mitigated by a fiduciary duty to act in a client’s best interest.

The firm currently has the following assets under management:

Regulatory Asset under Management	
Discretionary	\$0.00

#### Item 5 – Fees and Compensation

millionaireME wealth management charges its investment advisory clients an annual fee, charged on a quarterly basis in advance based on the value of the assets on the last business day of each quarter.

For accounts over \$10,000, CLS Investments, LLC charges a .25% asset management fee in addition to a .75% asset management fee charged by millionaireME for a total asset management fee of 1%. Accounts at or below \$10,000 are not subject to an asset management fee from CLS Investments, LLC but subject to .50% asset management fee from millionaireME. Fees are not negotiable.

Investment Amount	Fee
Up to \$10,000	0.50%
Over \$10,000	1.00%

The independent qualified custodian, TD Ameritrade Institutional, sends statements at least quarterly showing the market values for each security and all account disbursements including the amount of the advisory fees.

#### Termination and Refunds

An asset management agreement continues until the client or millionaireME wealth management decides to terminate it. Either party may terminate the account upon written notice. If the advisory agreement is terminated before the end of the quarterly period, clients are subject to a refund of unearned fees.

#### Wrap Fee Program

A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution,

custody and reporting fee. The fee is not based directly upon advisory services or the execution of transactions. millionaireME does not sponsor or act as the portfolio manager for a wrap fee program.

### **Other Types of Fees & Expenses**

Clients pay charges imposed directly by the selected mutual fund or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses). Client's are also subject to a custodial fee for retirement accounts ranging from \$50 to \$100 per year.

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

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millionaireME wealth management does not receive a performance-based fee or participate in side-by-side management.

### **Item 7 – Types of Clients**

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millionaireME wealth management primarily provides services to individuals and high net-worth clients.

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

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The methods of analysis include a combination of the following:

#### **Behavioral Analysis**

Behavioral analysis involves an examination of conventional economics as well as behavioral and cognitive psychological factors. Behavioral finance methodology seeks to combine a qualitative and quantitative approach to provide explanations for why individuals may, at times, make irrational financial decisions. Where conventional financial theories have failed to explain certain patterns, the behavioral finance methodology investigates the underlying reasons and biases that cause some people to behave against their best interests. The risks relating to behavior finance analysis are that it relies on spotting trends in human behavior that may not predict future trends.

#### **Charting Analysis**

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

#### **Cyclical Analysis**

Cyclical analysis is similar to technical analysis in that it involves the analysis of market conditions at a macro (entire market/economy) or micro (company specific) level, rather than the overall fundamental analysis of the health of the particular company that MillionaireME Wealth Management, LLC is may recommend or implementing. The risks with cyclical analysis are similar to those of technical analysis.

### **Fundamental Analysis**

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

### **Technical Analysis**

Technical analysis involves the analysis of past market data rather than specific company data in determining the may recommend or implementations made to clients. Technical analysis may involve the use of charts to identify market patterns and trends, which may be based on investor sentiment rather than the fundamentals of the company. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that MillionaireME Wealth Management, LLC will be able to accurately predict such a reoccurrence.

millionaireME wealth management through CLS, offers a variety of investment strategies.

- **Accumulation Strategies**  
Portfolios focused on total return - growth of value through interest, capital gains, and dividends proportionate to a client's risk profile. The portfolios are designed to seek intermediate and long-term capital appreciation and actively adjusted to take advantage of opportunities in the market.
- **Income Strategies**  
Portfolios that seek consistent, reliable distributions from a variety of traditional and non-traditional income-producing assets from around the globe that offer income opportunities consistent with a client's risk profile.
- **Protection Strategies**  
Portfolios that pursue capital growth during sustained market uptrends, yet seek protection of assets during market downturns. The portfolios seek long-term growth as well as protection of principal consistent with a client's lower risk profile and/or shorter time horizon.
- **Tax Managed Strategies**  
Portfolios that seek capital appreciation while keeping annual net taxable gains low. The portfolios are designed to seek to tax efficiency.

## **Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Below is a list of risks that should be considered prior to investing. Additional unforeseen risks may apply and affect investment performance.

- **Acts of God** – A natural and unavoidable catastrophe that interrupts the expected course of events, market structure and access to funds.
- **Allocation Risk** - The allocation of investments among different global asset classes may have a significant effect on your portfolio's value, when one of these asset classes is performing more poorly than others. As both the direct investments and derivative positions will be periodically adjusted to reflect our view of market and economic conditions, there will be transaction costs which may be, over time, significant. In addition, there is a risk that certain asset allocation decisions may not achieve the desired results and, as a result, your portfolio may incur significant losses.
- **Business Risk** – The measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Call Risk** – The risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Company Specific Risk** – An unsystemic risk specific to a certain company's operations, executive decisions and reputation which is difficult to quantify
- **Concentration Risk** – Concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.
- **Credit Risk** – The risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Currency/Exchange Rate Risk** – The risk of a change in the price of one currency against another.



- **Interest Rate Risk** – The risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes in interest rates than a bond or bond fund with a shorter duration.
- **Investment Company and Exchange Traded Fund Risk.** Some of our strategies allow for investments in investment companies (also known as mutual funds) and exchange traded funds (“ETF”). An investment in an investment company or ETF involves substantially the same risks as investing directly in the underlying securities. An investment company or ETF may not achieve its investment objective or execute its investment strategy effectively, which may adversely affect your portfolio’s performance. Your portfolio must pay its pro rata portion of an investment company’s or ETF’s fees and expenses. Shares of a closed-end investment company or ETF may trade at a premium or discount to the net asset value of its portfolio securities.
- **Inflationary Risk** – The risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **Legislative Risk** – The risk of a legislative ruling resulting in adverse consequences.
- **Liquidity Risk** – The possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – The risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification.
- **Municipal Bond Risk** – Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation or other political events that could have a significant effect on the ability of the municipality to make payments on the interest or principal of its municipal bonds. In addition, because municipalities issue municipal securities to finance similar types of projects, such as education, healthcare, transportation, infrastructure and utility projects, conditions in those sectors can affect the overall municipal bond market. Furthermore, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest will be subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of the Client’s assets or profits.
- **Real Estate Related Securities Risk** – Investing in real estate related securities includes, among others, the following risks: possible declines in the value of real estate; risks related to general and local economic conditions, including increases in the rate of inflation; possible lack of availability of mortgage funds; overbuilding; extending vacancies of properties; increases in competition, property taxes and operating expenses; changes in zoning laws; costs resulting from cleanup of, and liability

to third parties for damages resulting from environmental problems; casualty or condemnation losses; uninsured damages from floods, earth quakes or other natural disasters; limitations on and variations in rents; and changes in interest rates. Investing in Real Estate Investment Trusts (“REITs”) involves certain unique risks in addition to those risks associated with investing in the real estate industry in general. REITs are dependent upon management skills, are not diversified, and are subject to heavy cash flow dependency, default by borrowers and self-liquidation.

- **Reinvestment Risk** – The risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political Risk** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Terrorism Risk** – An act of terror or calculated use of violence against the country, market structure or individuals.

The firms’ methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

#### **Types of Investments (Examples, not limitations)**

millionaireME wealth management allocates client’s assets to help them reach their individual investment objectives within their time horizon in a manner consistent with their risk profile. millionaireME wealth management generally offers the following types of investments:

- **Cash Positions** – Based on a perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash may be included as assets subject to the agreed upon advisory fee. Other investment types may be included as appropriate for a particular client and their respective trading objectives. millionaireME wealth management generally invest client’s cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve a reasonable return on our client’s cash balances through relatively low-risk conservative investments.
- **Exchange Traded Funds (ETFs)** – An ETF is a portfolio of securities invested to track a market index similar to an index mutual fund, but the shares are traded on an exchange like an equity. An ETF share price fluctuates intraday depending on market conditions instead of having a net asset value (NAV) that is calculated once at the end of the day. The shares may trade at a premium or discount; and as a result, investors pay more or less when purchasing shares and receive more or less than when selling shares. The supply of ETF shares is regulated through a mechanism known as creation and redemption that involves large specialized investors, known as authorized participants (APs). Authorized participants are large financial institutions with a high degree of buying power, such as market makers, banks or

investment companies that provide market liquidity. When there is a shortage of shares in the market, the authorized participant creates more (creation). Conversely, the authorized participant will reduce shares in circulation (redemption) when supply falls short of demand. Multiple authorized participants help improve the liquidity of a particular ETF and stabilize the share price. To the extent that authorized participants cannot or are otherwise unwilling to engage in creation and redemption transactions, shares of an ETF tend to trade at a significant discount or premium and may face trading halts and delisting from the exchange.

- **Mutual Funds** – A pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
  - **Open-End Mutual Funds** – A type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature
  - **Closed-End Mutual Funds** – A type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. To provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
  - **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund’s concentration in the real estate industry.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

### **Item 9 – Disciplinary Information**

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millionaireME wealth management is obligated to disclose any disciplinary event that would be material when evaluating a client/adviser relationship. There are no such legal or disciplinary events required to be disclosed.

### **Item 10 – Other Financial Industry Activities and Affiliations**

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Jon C. Goodman has another financial industry activity as an insurance agent. He is appointed with multiple insurance carriers to sell insurance products for a commission.

Jon C. Goodman is also an investment advisor representative and owner of JCG Advisors, LLC (CRD No. 283746). JCG Advisors, LLC provides comprehensive asset management and financial planning that is not exclusive to the internet. In addition, Mr. Goodman owns and operates an investment related App named “millionaireME” that is designed to calculate the potential investment value of the price difference between competing consumer goods. The millionaireME App is not a registered investment adviser and operates independently of millionaireME wealth management.

Jon C. Goodman is the Managing Member of JCG CTA, LLC (“JCG CTA”). JCG CTA is exempt from registration as a commodity trading adviser with the National Futures Association (“NFA”) and is currently not involved in trading futures. Clients of JCG RIA are not solicited to trade futures through JCG CTA.

### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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In order to address conflicts of interest, millionaireME wealth management has adopted a code of ethics (the “Code”). A copy of the Code is available to any client or prospective client, free of charge, upon request.

The Adviser’s Code provides the following:

- A standard (or standards) of business conduct that reflect the adviser’s fiduciary obligations.
- Provisions requiring compliance with applicable federal securities laws.
- Provisions that require all “access persons” to report their personal securities transactions and holdings.
- Provisions requiring supervised persons to report any violations of the code of ethics promptly to the Chief Compliance Officer.
- Provisions requiring the firm to provide a copy of the code of ethics and any amendments to all covered persons.
- Provisions requiring all covered persons to provide the firm with a written acknowledgment of their receipt of the code and any amendments.
- The Code of Ethics permits covered persons to invest for their own personal accounts in the same or different securities than clients.
- Neither millionaireME wealth management nor a related person recommends to clients, or buys or sells for client accounts, securities in which they or a related person has a material financial interest.

A fiduciary duty is considered the core underlying principle for a Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. All business must be conducted with the highest level of ethical standards and to comply with all federal and state securities laws at all times.

## **Item 12 – Brokerage Practices**

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millionaireME wealth management does not maintain discretionary authority in determining the broker/dealer with whom orders for the purchase and sale of securities are placed for execution or the commission rates.

### **Best Execution**

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 the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, for the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Our recommendations to our clients are based on our clients' interests in receiving best execution and the level of competitive, professional services.

### **Trade Aggregation**

millionaireME does aggregate orders among all client accounts. Clients will share commission and transactions costs equally and receive securities at a total average price. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Some clients may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.

### **Soft Dollar**

Under "soft dollar" arrangements, brokerage firms provide or pay the costs of certain services, equipment or other items. millionaireME wealth management does not receive any soft dollar support. However, millionaireME wealth management receives certain benefits from TD Ameritrade through its participation in the TD Ameritrade Institutional program that include some or all of the following: discounts on compliance, marketing, technology, and practice management products or services provided by third party vendors.

The benefits received are not considered "soft dollar" because they do not depend on the amount of brokerage transactions directed to TD Ameritrade; however, millionaireME wealth management has an incentive to direct business to TD Ameritrade because of these benefits which is a conflict of interest. This conflict of interest is mitigated by the fiduciary duty to act in a client's best interest,

## **Item 13 – Review of Accounts**

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Account reviews are facilitated through a CLS arrangement with Orion Advisor Services, LLC ("Orion"). Orion provides a "back office" system which aggregates client data from multiple platforms and providers, maintain portfolio models, review models and accounts for variances, analyze account performance, generate quarterly statements and other reports. Orion facilitates the trading of client accounts and makes information available on-line via the internet, in a secure manner.

## **Item 14 – Client Referrals and Other Compensation**

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millionaireME wealth management may receive an occasional economic benefit from a product sponsor or the custodian that is not based on advisory services. Compensation may include promotional gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, workshops or marketing event.

### **TD Ameritrade, Inc.**

millionaireME wealth management participates in TD Ameritrade's institutional customer program and Advisor recommends TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Advisor's participation in the program and the investment advice it gives to its Clients, although Advisor 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): receipt of duplicate Client statements and confirmations;
- research related products and tools; consulting services;
- access to a trading desk serving 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 Advisor by third party vendors.

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

### **Referral Fees**

millionaireME wealth management does not directly or indirectly compensate any person for client referrals.

### **Item 15 – Custody**

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millionaireME wealth management does not have actual custody of client funds.

Client funds are held by a qualified custodian, TD Ameritrade, that sends statements at least quarterly to clients showing all disbursements including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated. Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

- The custodian sends statements at least quarterly to clients showing all disbursements in account including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated.

- Clients may provide authorization permitting advisory fees to be deducted in advance from client advisory account or receive an invoice for fees deducted in arrears.
- Payment of fees may result in the liquidation of a client's positions if there are insufficient funds in the account.
- Fees are assessed on all assets in the account(s), including securities, cash or money market balances.
- Margin debits do not reduce the value of the assets in the account for billing purposes.

Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

#### **Item 16 – Investment Discretion**

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millionaireME wealth management receives discretionary authority to select the security and amount to be bought or sold. Such discretion is to be exercised in a manner consistent with the stated investment objectives for the account. When selecting securities and determining amounts, millionaireME wealth management observes the investment policies, limitations, and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to millionaireME wealth management in writing.

millionaireME wealth management does not maintain non-discretionary accounts.

#### **Item 17 – Voting Client Securities**

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millionaireME wealth management does not vote, nor advise clients how to vote, proxies for securities. Clients retain the right to vote the proxies of shares held in their accounts.

millionaireME wealth management will not take any action or render any advice with respect to any securities held in any accounts that are named in or subject to class action lawsuits.

#### **Item 18 – Financial Information**

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millionaireME wealth management does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time has millionaireME wealth management been the subject of a bankruptcy petition.

**Item 1 - Cover Page**

Registered as JCG Consulting, Inc.  
Doing Business as: millionaireME wealth management



**Jon C. Goodman**

CRD No. 5065832

5 West Mendenhall Street  
Bozeman, MT 59715

December 21, 2018

This brochure supplement provides information about your Investment Advisor Representative that supplements the millionaireME wealth management disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through millionaireME wealth management an investment advisor firm. Please contact millionaireME wealth management at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## **Item 2 - Educational Background and Business Experience**

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

**Jon C. Goodman**

Year of birth: **1967**

### **Education**

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

- Duke University- Bachelor of Arts in English
- Georgetown University- Master of Arts in Liberal Studies
- Stanford University- Online Writing Certificate Program
- University of Chicago Booth School of Business/IMCA- Certified Private Wealth Advisor® Designation

### **Professional Designations**

The following provides information on professional designation(s) that your Financial Advisor earned.

#### **Certified Private Wealth Advisor® (CPWA®)**

This designation is from the Investment Management Consultants Association (IMCA) offered in conjunction with the University of Chicago Booth School of Business, making him the first and only CPWA® professional in the Greater Yellowstone/Grand Teton region. IMCA authorizes the use of the certification mark, CPWA®, to individuals who have met rigorous experience and ethical requirements, have successfully completed graduate level coursework, and have passed the CPWA® examination. The CPWA® certification process includes a challenging educational program focused on advanced wealth management topics, including tax, retirement, and estate planning, charitable giving techniques, portfolio management, asset protection, closely held business solutions, executive stock option and deferred compensation strategies, and behavioral finance.

### **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

#### **millionaireME wealth management**

President, Chief Compliance Officer and IAR

12/2018 – Present

#### **Jon C. Goodman RIA, LLC**

Owner, CEO, CCO and IAR

July 2016 - Present

**Managing Member**

JCG CTA, LLC

July 2016 – Present

**Managing Member**

JCG Life/Health/DI

October 2016 – Present

**Investment Advisor Representative**

Independent Financial Partners

October 2011- June 2016

**Registered Representative**

LPL Financial

October 2011 – June 2016

**Investment Advisor Representative**

Investment Centers of America

February 2010 - October 2011

**Principal, Software Designer**

Little Cloud LLC

October 2007 – February 2010

**Item 3 - Disciplinary Information**

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and disciplinary history could be obtained from the Securities Division of the Commonwealth of Massachusetts.

**Item 4 - Other Business Activities**

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

- Jon C. Goodman is an investment advisor representative of millionaireME and also JCG Advisors, LLC (CRD No. 283746). JCG Advisors, LLC provides interactive asset management and financial planning that is not exclusive to the internet. Both firms are owned and operated by Mr. Goodman.
- Jon C. Goodman owns and operates an investment realted App "millionaireME" that is designed to calculate the potential investment value of the price difference between competing consumer goods.

- Jon C. Goodman is an insurance agent and appointed with multiple insurance carriers to sell insurance products for a commission.
- Jon C. Goodman is the Managing Member of JCG CTA, LLC (“JCG CTA”) and JCG Life/Health/DI (“JCG Life”). JCG CTA is exempt from registration as a commodity trading adviser with the National Futures Association (“NFA”) and is currently not involved in trading futures. Clients of JCG RIA are not solicited to trade futures through JCG CTA.

#### **Item 5 - Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person’s regular salary, if any.

Mr. Goodman receives compensation from the additional business activities listed in Item 4.

Jon C. Goodman does not receive any other regular compensation. However, he may receive compensation from product sponsors such as promotional gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives.

#### **Item 6 - Supervision**

This section explains how millionaireME wealth management supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

millionaireME wealth management maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Jon C. Goodman is the sole Investment Advisor Representative and also serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of controls.

## Privacy Policy

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Effective: December 21, 2018

### Our Commitment to You

millionaireME wealth management (the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

millionaireME wealth management does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. millionaireME wealth management does not share non-public personal information with non-affiliated third parties unless a client specifically consents to the disclosure. Any such sharing would require an "opt-in" to obtain a signed statement making an affirmative declaration of permission to disclose such information.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities

to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> millionaireME wealth management does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where millionaireME wealth management or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> millionaireME wealth management does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (406) 233-6361 or [jcg@MYmillionaireMe.com](mailto:jcg@MYmillionaireMe.com).