

Bolmgren RetirePLAN

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Bolmgren RetirePLAN, a division of William Joseph Capital Management, Inc. If you have any questions about the contents of this brochure, please contact us at 312-463-4085 or by email at: justin.bolmgren@wjcmllc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about William Joseph Capital Management, Inc. is available on the SEC's website: www.adviserinfo.sec.gov

William Joseph Capital Management, Inc.

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

None

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of our Firm

William Joseph Capital Management, Inc. ("WJCM") is an investment advisory firm registered with the SEC and headquartered in the State of Connecticut. It was founded in 2015. The principal owners of William Joseph Capital Management, Inc. are Mr. Matthew Thomas Sweeney and Mr. Joseph "Jody" Elzie Goss.

Bolmgren RetirePLAN ("BRP", "we", "our", "us") is a division of WJCM. This brochure discusses the products and services and any disclosures provided by BRP.

B. Types of Advisory Services

We offer the following services to advisory clients:

Investment Management Services – Individuals

We offer ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. After reviewing your current situation (income, tax levels, and risk tolerance levels), we construct a plan to aid in the selection of a portfolio that matches your specific situation. Investment Management Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

We evaluate your current investments with respect to your risk tolerance levels and time horizon. We will request discretionary authority from you in order to select and execute securities without receiving your prior permission.

Services Limited to Specific Types of Investments

We generally limit our money management to mutual funds, equities, bonds, fixed income, debt securities, and ETFs. We may use other securities as well to help diversify a portfolio when applicable.

Investment Management Services – Employer Sponsored Plans

This service provides consulting services to employer plan sponsors (“Sponsor”) and will typically consist of assisting you to establish, monitor and review your company's participant-directed retirement plan. As your needs dictate, areas of advising could include investment options, plan structure and participant education. All Investment supervisory services for employer sponsored plans shall be in compliance with the applicable state law(s) regulating retirement plan consulting services. This applies to client accounts that are retirement or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and we accept appointments to provide our services to such accounts, we acknowledge that we are a fiduciary within the meaning of Section 3(21) of ERISA (but only with respect to the provision of services described in section 1 of the corresponding advisory agreement).

C. IRA Rollover Recommendations

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

D. Client Tailored Services and Client Imposed Restrictions

You may impose restrictions on investing in certain securities or types of securities in accordance with your values or beliefs. However, if the restrictions prevent us from properly servicing your

account, or if the restrictions would require us to deviate from our standard suite of services, we reserve the right to end the relationship.

E. Amounts Under Management

BRP has the following assets under management as of 12/31/2022:

Discretionary: \$26,652,895
Non-Discretionary: \$9,186,946

WJCM has the following assets under management as of 12/31/2022:

Discretionary: \$201,000,000

Item 5: Fees and Compensation

A. Fee Schedule

Investment Management Services Fees – Individuals

Total Assets Under Management	Annual Investment Management Fee
\$1 - \$250,000	1.00%
\$250,001 – \$500,000	0.90%
\$500,001 – \$750,000	0.80%
\$750,001 – \$1,000,000	0.70%
Above \$1,000,000	0.60%

These fees are negotiable depending upon your needs and the complexity of your situation. The final fee schedule is attached to your Investment Advisory Contract as Exhibit II. For personal investment management services, fees are paid quarterly in advance, and you may terminate your contract with one days' written notice. The fee is calculated based on the value of the account as of the last day of the prior quarter.

For small business employer sponsored plans, fees are paid quarterly, in arrears, and you may terminate your contract with one day's written notice. The fee is calculated based on the value of the account as of the last business day of the quarter.

Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the quarter terminated. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the

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number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

Advisory fees are withdrawn directly from your account with your written authorization. At least quarterly, your custodian will send you a portfolio statement showing all disbursements from your account, including the amount of the advisory fee.

Investment Management Services – Employer Sponsored Plans

Total Assets Under Management	Annual Investment Management Fee
\$1 - \$1,000,000	0.75%
\$1,000,001 – \$5,000,000	0.60%
\$5,000,001 – \$10,000,000	0.50%
Above \$10,000,000	negotiable

These fees are negotiable depending upon your needs and the complexity of your situation. Fees are paid quarterly in arrears, and you may terminate your contract with one days' written notice. The fee is calculated based on the value of the account as of the last business day of the quarter.

If your account is with American Funds, the fee is calculated based on the average daily balance of the account during the prior quarter.

B. Clients Are Responsible for Third Party Fees

You are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fee we charge you for investment management services. Please see Item 12 of this brochure regarding broker/custodian.

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

We do not accept performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a client.

Item 7: Types of Clients

We generally provide management supervisory services to the following types of clients:

- ❖ Individuals

- ❖ High-Net-Worth Individuals
- ❖ Employer-Sponsored Retirement Plans

Minimum Account Size

There is an account minimum which may be waived by the investment advisor, based on your needs, the complexity of your situation, the full value of our relationship with you, or the expectation of future business opportunities.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Our methods of analysis include charting analysis, fundamental analysis, technical analysis, cyclical analysis.

Charting analysis involves the use of patterns in performance charts. We use this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

We use long term trading, short term trading, and sub-advisors.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

As described in Item 4.B., we formulate investment advice based on the information you provide during the initial onboarding survey and subsequent calls with a financial advisor. We may optimize your investment portfolio choices by recommending lower-cost investment alternatives, methods of diversifying portfolios, and asset class weights that optimize your return per unit of risk. The goal of this optimization method is to achieve efficient frontier portfolios, which offer the highest expected return for a defined level of risk or the lowest risk for a given level of expected return.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in solely using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would assume that past performance will be indicative of future performance. This may not be the case.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Long-term trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Short term trading generally holds greater risk, and you should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

We generally seek investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: 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. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Fixed Income is an investment that offers fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Exchange Traded Funds (ETF): Investing in ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). ETF's may also be priced at a discount or premium to the value of the assets within the fund.

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various other types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Short-term trading risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no Criminal or Civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither we nor our advisors are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither we nor our advisors are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

We have no registration relationships that would create a possible conflict of interest.

D. Selection of Other Advisers or Managers and How We Are Compensated for Those Selections

We may utilize or select other advisers to manage your assets, also known as “sub-advisors”. These advisers will charge their own fee in addition to the investment management fee you pay us. Please refer to the disclosure brochure for the sub-advisor.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

We do not recommend that clients buy or sell any security in which we or our related person have a material financial interest.

C. Trading Securities At/Around the Same Time as Clients’ Securities

From time to time, our advisors may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for our advisors to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. We will always transact client’s transactions before our own when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

We do not maintain custody of your assets that we manage, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (See Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian”, generally a broker-dealer or bank. We use the following custodians: Charles Schwab & CO, Inc. (:Schwab”), Capital Bank & Trust (American Funds) and Mid Atlantic Trust Company. Please refer to the documents provided when you open the account with the custodian.

1. *Schwab as Custodian*

We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/ broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. Conflicts of interest associated with this arrangement are described below as well as in Item 14 (Client referrals and other compensation). You should consider these conflicts of interest when selecting your custodian.

We do not open the account for you, although we may assist you in doing so. If you do not wish to place your assets with Schwab, then we may not be able manage your account.

We recommend Schwab, a custodian/ broker, to hold your assets and execute transactions. When considering whether the terms that Schwab provides are, overall, most advantageous to you when compared with other available providers and their services, we take into account a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability • Prior service to us and our clients

2. Brokerage and Custody Costs

For our clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, mutual funds and ETFs) do not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab's Cash Features Program.

We are not required to select the broker or dealer that charges the lowest transaction cost, even if that broker provides execution quality comparable to other brokers or dealers. All trades will be executed by Schwab and we have determined that having Schwab execute your trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians"). By using another broker or dealer you may pay lower transaction costs.

3. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

4. Clients Directing Which Broker/Dealer/Custodian to Use

We will require clients to use a specific broker-dealer to execute transactions.

B. Aggregating (Block) Trading for Multiple Client Accounts

We have the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing us the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly by Justin Bolmgren with regard to your respective investment policies and risk tolerance levels.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in your financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

You will receive at least quarterly from the custodian, a written report that details your account including assets held and asset value.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

We do not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

We do not have physical custody of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. If you have a question regarding account statements or if you did not receive a statement from the custodian, please contact us at the contact information provided on the front page of this brochure.

Item 16: Investment Discretion

For those client accounts where we will have investment discretion, you will give us written discretionary authority over your accounts with respect to securities to be bought or sold and the amount of securities

to be bought or sold. Details of this relationship are fully disclosed to you before any advisory relationship has commenced. You provide us discretionary authority via a discretionary investment management clause in the Investment Advisory Contract and/or a limited power of attorney clause in the contract between you and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

We will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

We do not have any financial situation that will result in our inability to meet our contractual commitments to you.