

WELLth Advisory Services, LLC

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Registered Investment Advisor

Firm Brochure

Form ADV Part 2A

March 26, 2024

This brochure provides information about the qualifications and business practices of WELLth Advisory Services, LLC, a registered investment advisor. If you have any questions about the contents of this brochure, please contact us at 866-777-4015. 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 WELLth Advisory Services, LLC is also available on the SEC's website at www.advisorinfo.sec.gov. You may search this site by our identifying number known as a CRD number. The CRD number for WELLth Advisory Services, LLC is 330537.

Registration with the SEC or any state securities authority does not imply a certain level of skill or training. You are encouraged to review this brochure and brochure supplements for our firm's associates for more information on the qualifications of our firm and its employees.

Item 2: Material Changes

WELLth Advisory Services, LLC amends its disclosure brochure on an annual basis. To receive a copy of our most recent brochure at any time during the year, please call WELLth Advisory Services, LLC at 866-777-4015, and a copy will be sent to you. You may also obtain a copy of the most current brochure and additional information on our firm from www.advisorinfo.sec.gov under Investment Advisor Search. If applicable, this section will contain a summary of material changes to the information in our brochure since the last annual update of this brochure.

This is the initial filing with the SEC for WELLth Advisory Services, LLC.

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Item 4: Advisory Business

WELLth Advisory Services, LLC is registered as an investment advisor with the SEC. WELLth Advisory Services, LLC is organized as a limited liability company under the laws of the state of Nevada and has been in business since 2024. WELLth Advisory Services, LLC (sometimes referred to herein as “we,” “us” or “WELLth Advisory Services”) is owned by SRP Holdings Group, LLC, a Delaware corporation. The WELLth Advisory Services main office is located at 25434 Prairiewood Lane, Shorewood, Illinois 60404. The WELLth Advisory Services Senior Management Team consists of Jeff Cullen, Chief Executive Officer; Deane Mayerhofer, Chief Operating Officer; and Sarah Hughes, Chief Compliance Officer.

WELLth Advisory Services recognizes that the advisor’s role should extend beyond investment guidance and often requires a variety of coordinated financial service strategies to create a roadmap to achieving financial goals for their clients. We support this effort by providing our Investment Advisory Representatives (“IARs”) with the tools and resources to meet client needs and objectives.

Retirement Plan Services

We approach client service with a collaborative style delivered by a dedicated plan consultant team in our regional offices. This team is further supported by specialists who are specifically focused in the areas of ERISA Compliance, Investment Research, Provider Analysis, Fee Benchmarking, Employee Education, and Executive Benefits. We wake up every day with a renewed and unparalleled commitment to excellence that is supported by the latest technology, deep research capabilities, operational efficiencies, and a craftsman-like focus on detail. We adhere to operating principles and values that emphasize independence, work ethic, and a laser-like focus on the needs of our clients.

WELLth Advisory Services, through its affiliated IARs, provides consulting and advisory services to both ERISA and Non-ERISA employer sponsored retirement plans, including, but not limited to, 401(k), 457(b), 457(f), 403(b), Simple IRA, SEP IRA, nonqualified, deferred compensation, pension and profit-sharing plans (collectively, “Plans” or individually, “Plan”) on both a one-time and/or ongoing basis.

WELLth Advisory Services offers a suite of detailed engagement agreements which are customized for each client relationship and executed by the Plan’s designated fiduciary upon conclusion of a careful review, which, at times, includes the client’s independent legal counsel. Through its agreements, WELLth Advisory Services is engaged to provide investment advisory services on either a “nondiscretionary” basis (serving as a “fiduciary” as defined by Section 3(21)(A)(ii) of the Employee Retirement Income Security Act of 1974 (“ERISA”)); or on a “discretionary” basis and thus will serve as an “Investment Manager” as defined by Section 3(38) of ERISA. Certain other additional services available from WELLth Advisory Services would be considered non-fiduciary by definition and function and are explicitly detailed within the Plan’s executed agreement.

For non-discretionary services, WELLth Advisory Services and its IARs will act in a solely advisory capacity and will not have or exercise any discretionary authority or control relative to the management or investment of the assets of the respective Plan.

For discretionary services, WELLth Advisory Services and its IARs will be designated as the Investment Manager to the Plan and assume responsibility for the investment selection and asset management for the Plan’s master menu made available to the Plan participants from which to choose. In all cases, WELLth Advisory Services will not serve as the “named fiduciary” of the Plan.

Our agreements offer our clients the opportunity to select one or more of the following services in various engagement categories:

The Plan-level Fiduciary Services that are provided under the Agreement include:

- Non-Discretionary Fiduciary Services may include:
 - Investment Policy Statement.

- Ongoing Investment Selection and Recommendations.
- Ongoing Investment Monitoring.
- Qualified Default Investment Alternative Assistance.
- Non-Discretionary Model Portfolios.
- Discretionary Fiduciary Services may include:
 - Investment Policy Statement.
 - Ongoing Investment Discretion and Selection.
 - Ongoing Investment Monitoring.
 - Qualified Default Investment Alternative.
 - Discretionary Model Portfolios.

The Plan-level Non-Fiduciary Services may include:

- Service Provider Liaison.
- Education Services to Plan Committee.
- Plan Search Support/Vendor Analysis.
- Benchmarking Services.
- Assistance Identifying Plan Fees.
- Plan Design Consulting.
- Plan Review.

Participant-level Services may include:

- Participant Enrollment.
- Participant Education.
- Comprehensive Wellness Program.

Based on the needs of the client, the agreement will specify the services on a client-by-client basis.

Wealth Management Services

WELLth Advisory Services offers investment advisory, portfolio management, and financial planning services to individuals and families. Our investment recommendations primarily include mutual funds, exchange-traded funds, and separate account managers investing in exchange-listed equity securities. The advice provided by WELLth Advisory Services is tailored to the unique objectives of each client. We work with clients to formulate an investment strategy after discussing risk tolerance, time horizon, and projected future liquidity needs, current holdings, tax considerations, personal market views and other factors. This strategy provides guidance to formulate suitable investment and financial recommendations. We meet with clients as needed to review portfolio performance, discuss current issues, and reassess goals and investment plans. Client input, involvement and decision-making are critical to the planning process and implementation of investment decisions.

WELLth Advisory Services also offers financial plans. These financial planning services are based on the client's financial situation at the time the financial information is disclosed by the client to WELLth Advisory Services. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Because clients' financial situations, goals, objectives, or needs change, clients are encouraged to notify us promptly if they wish to update their financial plan.

WELLth Advisory Services also offers discretionary management services to our individual clients. Regardless of whether our authority is discretionary or non-discretionary, clients may impose reasonable restrictions on investing in certain securities or types of securities.

The asset management program sponsors utilized by WELLth Advisory Services include, but are not limited to the LPL Financial, LLC ("LPL") sponsored advisory programs listed below:

Manager Access Select Program

Manager Access Select offers clients the ability to participate in the Separately Managed Account Platform (the “SMA Platform”) or the Model Portfolio Platform (the “MP Platform”). In the SMA Platform, WELLth Advisory Services will assist client in identifying a third-party portfolio manager (SMA Portfolio Manager) from a list of SMA Portfolio Managers made available by LPL, and the SMA Portfolio Manager manages client’s assets on a discretionary basis. WELLth Advisory Services will provide initial and ongoing assistance regarding the SMA Portfolio Manager selection process. In the MP Platform, clients authorize LPL to direct the investment and reinvestment of the assets in their accounts, in accordance with the selected model portfolio provided by LPL’s Research Department or a third-party investment advisor.

A minimum account value of \$50,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be lower or higher.

Optimum Market Portfolios Program (OMP)

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds shares. Under OMP, the client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. WELLth Advisory Services will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. WELLth Advisory Services will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client’s investment objective. LPL will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL will also have authority to rebalance the account.

A minimum account value of \$10,000 is required for OMP. In certain instances, LPL will permit a lower minimum account size. Account fees are payable quarterly in advance.

Personal Wealth Portfolios Program (PWP)

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. WELLth Advisory Services will have discretion for selecting the asset allocation model portfolio based on client’s investment objective. WELLth Advisory Services will also have discretion for selecting third-party money managers (PWP Advisors), mutual funds and ETFs within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds, ETFs and equity and fixed income securities.

A minimum account value of \$250,000 is required for PWP. In certain instances, LPL will permit a lower minimum account size. Account fees are payable quarterly in advance.

Model Wealth Portfolios Program (MWP)

MWP offers clients a professionally managed mutual fund asset allocation program. WELLth Advisory Services will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. WELLth Advisory Services will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL’s Research Department consistent with the client’s stated investment objective. LPL’s Research Department, a third-party portfolio strategist and/or WELLth Advisory Services, through its IAR, may act as a portfolio strategist responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to the mutual funds or ETFs selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds and ETFs and to liquidate previously purchased securities. The client will also authorize LPL to effect rebalancing for MWP accounts. MWP requires a minimum asset value for a program account to be managed. The minimums vary depending on the portfolio(s) selected and the account’s allocation amongst portfolios. The lowest minimum for a portfolio is \$25,000. In certain instances, a lower minimum for a portfolio is permitted. Account fees are payable quarterly in advance.

Small Market Solution (SMS) Program

Under SMS, LPL Research (a team of investment professionals within LPL) creates and maintains a series of different investment menus ("Investment Menus") consisting of a mix of different asset classes and investment vehicles ("investment options") for clients that sponsor and maintain participant-directed defined contribution plans ("Plan Sponsors"). The Plan Sponsor is responsible for selecting the Investment Menu that it believes is appropriate based on the demographics and other characteristics of the Plan and its participants. LPL Research is responsible for the selection and monitoring of the investment options made available through Investment Menus. The investment options that are offered through SMS are limited to the specific investments available through the record keeper that the Plan Sponsor selects. The Plan Sponsor may only select an Investment Menu in its entirety and does not have the option to remove or substitute an investment option.

In addition to the services described above, Plan Sponsor may also select from a number of consulting services available under SMS that are provided by WELLth Advisory Services. These consulting services may include, but are not limited to general education, and support regarding the Plan and the investment options selected by Plan Sponsor; assistance regarding the selection of, and ongoing relationship management for, record keepers and other third-party vendors; Plan participant enrollment support; and participant-level education regarding investment in the Plan. These consulting services do not include any individualized investment advice to the Plan Sponsor or Plan participants with respect to Plan assets. Account fees are payable in arrears based on the frequency agreed to between the client and WELLth Advisory Services.

Guided Wealth Portfolios (GWP)

GWP offers clients the ability to participate in a centrally managed, algorithm-based investment program, which is made available to users and clients through a web-based, interactive account management portal ("Investor Portal"). Investment recommendations to buy and sell exchange-traded funds and open-end mutual funds are generated through proprietary, automated, computer algorithms (collectively, the "Algorithm") of FutureAdvisor, Inc. ("FutureAdvisor"), based upon model portfolios constructed by LPL and selected for the account as described below (such model portfolio selected for the account, the "Model Portfolio"). Communications concerning GWP are intended to occur primarily through electronic means (including but not limited to, through email communications or through the Investor Portal), although WELLth Advisory Services will be available to discuss investment strategies, objectives, or the account in general in person or via telephone.

A preview of the Program (the "Educational Tool") is provided for a period of up to forty-five (45) days to help users determine whether they would like to become advisory clients and receive ongoing financial advice from LPL, FutureAdvisor and WELLth Advisory Services by enrolling in the advisory service (the "Managed Service"). The Educational Tool and Managed Service are described in more detail in the GWP Program Brochure. Users of the Educational Tool are not considered to be advisory clients of LPL, FutureAdvisor or WELLth Advisory Services, do not enter into an advisory agreement with LPL, FutureAdvisor or WELLth Advisory Services, do not receive ongoing investment advice or supervisions of their assets, and do not receive any trading services. A minimum account value of \$5,000 is required to enroll in the Managed Service.

Potential Conflicts of Interest

Transactions in LPL advisory program accounts are generally made through LPL as the executing broker-dealer. WELLth Advisory Services receives compensation as a result of a client's participation in an LPL program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what WELLth Advisory Services would receive if the client participated in other programs, whether through LPL or another sponsor, or paid separately for investment advice, brokerage, and other services.

Assets Under Management and Advisement

As of March 26, 2024, WELLth Advisory Services manages a total of \$0M regulatory assets under management, which includes \$0M of discretionary assets under management, and \$0M of non-discretionary assets under management.

Item 5: Fees and Compensation

WELLth Advisory Services charges the fees identified below, but fees are negotiable on a client-by-client basis.

Retirement Plan Services

The WELLth Advisory Services fee and billing procedures are described in the Agreement between the client and WELLth Advisory Services; these fees are negotiable. As a result, we do not have a standard fee schedule that applies to all Clients. The only fees received by WELLth Advisory Services are those fees described in the Agreement. The Agreement provides for asset-based, flat fee, hybrid, and project-based fee billing. Clients receive an invoice or, alternatively, they may elect to pay the fee directly or instruct their custodian to pay the fee from plan assets without receipt of an invoice.

Unless specifically negotiated with the Sponsor, asset-based fees do not include the value of any assets invested in Plan participants' self-directed brokerage accounts ("SDBAs").

Fees may be paid on a monthly or quarterly basis, to be determined by WELLth Advisory Services and its clients. Fees are due upon receipt of statement, if applicable. If the fee structure is based upon a percentage of the Plan's assets, monthly fees will be calculated based upon the average net assets in each investment option for the calendar month. Clients pay brokerage transaction costs and other charges directly to the custodian. See Item 12.

Wealth Management Services

Direct Asset Management Fees:

<u>Assets Under Management</u>	<u>Maximum Annual Fee</u>
\$1,000,000 or Under	2.0%
\$1,001,000 to \$2,000,000	1.5%
Over \$2,000,001	1.0%

Fees for LPL Advisory Programs

The account fee charged to the client for each LPL advisory program is negotiable, subject to the following maximum account fees:

Manager Access Select	3.0%*
OMP	2.5%
PWP	2.5%
MWP	2.65%**
SMS	0.95%***
GWP	1.35%****

* The maximum Manager Access Select account fee for new accounts was reduced to 2.5% effective July 3, 2017.

** The MWP account fee consists of an LPL program fee, a strategist fee (if applicable) and an advisor fee of up to 2.00%. Accounts remaining under the legacy fee structure may be charged one aggregate account fee, for which the maximum account fee is 2.50%. See the MWP program brochure for more information.

** The SMS fee consists of an LPL program fee of 0.20% (subject to a minimum program fee of \$250) and an advisor fee of up to 0.75%.

*** GWP Managed Service clients are charged an account fee consisting of an LPL program fee of 0.35% and an advisor fee of up to 1.00%. In the future, a strategist fee may apply. However, LPL Research currently serves as the sole portfolio strategist and does not charge a fee for its services. FutureAdvisor is compensated directly by LPL for its services, including the Algorithm and related software, through an annual sub-advisory fee (tiered based on assets under management by FutureAdvisor, at a rate ranging from 0.10% to 0.17%). As each asset tier is reached, LPL's share of the compensation shall increase, and clients will not benefit from such asset tiers.

GWP Educational Tool provides access to sample recommendations at no charge to users. However, if users decide to implement sample recommendations by executing trades, they will be charged fees, commissions, or expenses by the applicable broker or advisor, as well as underlying investment fees and expenses.

Account fees are payable quarterly in advance, except that the SMS fee is paid in arrears on the frequency agreed to between client and WELLth Advisory Services.

Excluding SMS and GWP, LPL serves as program sponsor, investment advisor and broker-dealer for the LPL advisory programs. In the Managed Service of GWP, LPL is appointed by each client as custodian of account assets and broker-dealer with respect to processing securities transactions for the accounts. In general, FutureAdvisor, in its capacity as investment advisor, will submit transactions through LPL; however, FutureAdvisor may choose to execute transactions through a broker-dealer other than LPL, subject to its duty to seek to achieve best execution. When securities transactions are effected through LPL, there are no brokerage commissions charged to the account. If FutureAdvisor chooses to execute a transaction through a broker-dealer other than LPL, the execution price may include a commission or fee imposed by the executing broker-dealer. In evaluating whether to execute a trade through a broker-dealer other than LPL, Future Advisor will consider the fact that the account will not be charged a commission if the transaction is effected through LPL.

WELLth Advisory Services and LPL may share in the account fee and other fees associated with program accounts. Associated persons of WELLth Advisory Services may also be registered representatives of LPL. Under SMS, LPL serves as investment advisor but not the broker-dealer. WELLth Advisory Services and LPL may share in the advisory portion of the SMS fee.

LPL serves as program sponsor, investment advisor and broker-dealer for the LPL advisory programs. WELLth Advisory Services and LPL may share in the account fee and other fees associated with program accounts. WELLth Advisory Services IARs may also be registered representatives of LPL.

For clients that are billed on a quarterly basis, fees will be calculated based upon the ending market value of the plan assets as of the last day of the prior quarter. Clients may authorize the investment provider or custodian to pay compensation directly to WELLth Advisory Services by deducting the advisory fee directly from the client's account. As part of this process, the client understands and acknowledges the following:

- The independent custodian sends statements at least quarterly to the client reflecting the market values for each security included in the assets and all disbursements in the client's account including the amount of the advisory fees paid to WELLth Advisory Services;
- The client provides authorization permitting WELLth Advisory Services to be directly paid by these terms;
- For accounts utilizing LPL as the custodian, LPL will perform the billing and will take instruction from the client to calculate and deduct advisory fees. For accounts that are not held at LPL, we generally send a copy of our invoice to the independent custodian at the same time we send the invoice to our client;
- The invoice includes a legend that urges the client to compare information provided in their statements with those from the qualified custodian in account opening notices and subsequent statements sent to

the client.

For accounts using LPL as the custodian, LPL deducts advisory fees quarterly in advance based on the value of the account assets as of the close of business on the last business day of the preceding quarter. For the initial fee deduction, LPL deducts the advisory fee at the beginning of the quarter following the establishment of the account and includes a prorated fee for the initial quarter in addition to the quarterly advisory fee for the upcoming quarter. Subsequent fee deductions are made at the beginning of each quarter based on the value of the account assets as of the close of business on the last business day of the preceding quarter. Additional deposits and withdrawals will be added or subtracted, based on the prorated days to quarter end, from the assets, which may lead to an adjustment of the advisory fee. Accounts held at other custodians may be billed in advance or in arrears, depending upon the agreement between the client, WELLth Advisory Services, and the particular custodian.

For clients who choose to be billed in advance, if the client wishes to terminate our services, we will refund the unearned portion of our advisory fee to the client. Clients will be required to contact us in writing in order to terminate our services. Upon receipt of a client's letter of termination, we will proceed to close out or remove our access to the client's account and process a pro-rated refund of unearned advisory fees.

Hourly and Fixed Fee Financial Planning Fees:

WELLth Advisory Services will charge on an hourly or fixed fee basis for financial planning and consulting services. The total estimated fee will be based on the time, scope, and complexity of our engagement with clients. Generally, our hourly fee will not exceed \$350. In the case of fixed fee financial planning, payment for services will be according to individual arrangement. In general, a portion of the fee is paid in advance with the balance paid upon the completion and presentation of the project. In all cases, we will not require a retainer exceeding \$1,200.00 if services cannot be undertaken within 6 (six) months.

Third-party Asset Management Program Sponsor Fees:

IARs may recommend the use of other independent investment advisors or third-party asset management program sponsors that provide specialized investment advisory services to meet the needs and objectives of certain WELLth Advisory Services clients. These advisors will charge advisory fees independent of WELLth Advisory Services. A portion of the advisory fee will be paid to WELLth Advisory Services.

Clients utilizing the services of third-party asset managers will receive documentation from the manager including an asset management agreement and disclosure of services to be provided and fees to be charged. The client will receive a disclosure brochure from WELLth Advisory Services and from the independent manager. Accounts managed by third-party asset managers will be subject to the terms of the specific agreement and cancellation policy of the particular third-party asset manager.

Additional Fees and Expenses:

WELLth Advisory Services' fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which will be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third-party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to WELLth Advisory Services' fee.

Commissionable Securities Sales:

Certain investment advisor representatives of WELLth Advisory Services are also associated with LPL as broker-dealer registered representatives ("Dually Registered Persons"). In their capacity as registered representatives of LPL, certain Dually Registered Persons may earn commissions for the sale of securities or investment products that they recommend for brokerage clients. They do not earn commissions on the sale of securities or investment products recommended or purchased in advisory accounts through WELLth Advisory Services. Clients have the option of purchasing many of the securities and investment products we make available to clients through another broker-dealer or investment advisor. However, when purchasing these securities and investment products away from WELLth Advisory Services, clients will not receive the benefit of the advice and other services we provide.

Item 6: Performance Based Fees

WELLth Advisory Services does not charge fees based on a share of capital gains or on capital appreciation of the assets of a client and therefore does not simultaneously manage performance based and non-performance-based accounts.

Item 7: Types of Clients

WELLth Advisory Services works with the following types of clients:

- Individuals and high net worth individuals.
- Pension, retirement, and profit-sharing plans.
- Corporations, Limited Liability Companies and/or other Institutions.

In general, WELLth Advisory Services does not have a minimum amount to open and maintain an account, however certain third-party asset managers and IARs may require a minimum investment in order to open a managed account.

The specific amounts are detailed in the third-party asset managers' agreements or in the WELLth Advisory Services agreement, as negotiated by the client and WELLth Advisory Services. Accounts below the stated minimums may be accepted on an individual basis at the discretion of WELLth Advisory Services and the platform sponsor.

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

WELLth Advisory Services' business model is targeted to each IAR's individual investment style, strategy, and philosophy, taking into consideration clients' specific objectives and goals. The IAR's methods of investment analysis and strategies may vary from one office to another. The following details the types of analysis IARs use to formulate client recommendations:

- **Fundamental Analysis:** We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.
- **Charting:** In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.
- **Technical Analysis:** We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movements. Technical analysis does not consider the underlying financial condition of a company. This presents a risk

in that a poorly managed or financially unsound company may underperform regardless of market movement.

- Cyclical Analysis: In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.
- Mutual Fund and/or ETF Analysis: IARs review the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest successfully over a period of time and in different economic conditions. IARs also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is a significant overlap in the underlying investments held in other funds in the client's portfolio. A risk of mutual fund and/or ETF analysis is that, as with all securities investments, past performance does not guarantee future results.

Risks for all forms of analysis: The WELLth Advisory Services securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, provide accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information. For ERISA plans in which participants direct the investments in their accounts, WELLth Advisory Services seeks to ensure that the plan complies with the ERISA 404(c) requirement for the "broad array" of investment options to enable participants to develop a diversified portfolio.

Investment Strategies:

- Long-Term Purchases: When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically, we employ this sub-strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this asset class.
- Short-Term Purchases: When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase.
- Trading: We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Investing always involves some risk, whether securities, certificates of deposit or in any other type of investment. There is risk of loss of principal and also risk of loss of purchasing ("buying") power. WELLth Advisory Services' objective is to help clients understand the different types of risk and mitigate the risk over time. One way to lessen risk is to diversify investment portfolios so that when some fall in value, others may rise in value.

Securities investments are not guaranteed, and clients may lose money on their investments, including their principal. Past performance is no guarantee of future results. We ask that clients work with us to help us understand their tolerance for risk. Depending on the type of securities selected, some additional risk factors (below) could become relevant and should be discussed with the Advisory Associate.

Additional Risk Factors:

- Market Risk: Risk that cannot be mitigated through diversification because an event of great

magnitude (such as recession, political turmoil, natural disaster, terrorist attack) has occurred that impacts the markets systemically.

- **Inflation Risk:** Risk that an investor may lose some of their purchasing power if the investment does not outpace inflation. This can be an issue for “safe-haven” instruments like money market funds or treasury bills.
- **Equity Risk:** Risk that shares of stock, which have no guaranteed returns, could decline in value based on low demand, business challenges or broader economic factors. Also, if a company becomes insolvent for whatever reason, common stockholders have a low priority claim on remaining assets after secured credit holders, subordinated bondholders, and preferred stockholders.
- **Liquidity Risk:** Risk of loss from inability to liquidate shares promptly at a desirable price. Some investments, such as interval funds, have limited quarterly liquidity windows, while other investments might be in low demand. Alternative investments, such as non-traded REITs, are often entirely illiquid for 5 years or more until a single liquidity event occurs.
- **Interest Rate Risk:** Risk that interest rates could rise, making a currently held bond with a lower interest rate less valuable to a prospective buyer because higher rates are readily available.
- **Longevity Risk:** Risk that an investor, especially a retiree, will outlive their investment income.
- **Currency Risk:** Risk that an overseas investment will fluctuate as a result of the exchange rate between the US dollar and the currency of the country where the asset is held.
- **Time Horizon Risk:** Risk that an investor may face an unexpected change to their planned time horizon, such as a disability, job loss, divorce, etc.
- **Default Risk:** Risk that a bond issuer will become insolvent and default on their obligation to make interest payments to debtholders/investors.

Item 9: Disciplinary Information

We are required to disclose whether there are legal or disciplinary events that are material to a client’s or prospective client’s evaluation of our advisory business or the integrity of our management. If our firm or IARs have been involved in one of these events, we must disclose that information in our Form ADV Part 2A brochure for ten years following the date of the event, unless (1) the event was resolved in our or the IAR’s favor, or was reversed, suspended, or vacated, or (2) the event is not material.

WELLth Advisory Services and its employees and IARs have not been involved in any legal or disciplinary events in the past ten years that would be material to a client’s evaluation of the company or its personnel.

Item 10: Other Financial Industry Activities and Affiliations

WELLth Advisory Services is a wholly owned entity of SRP Holdings Group, LLC (“SRP”), headquartered in Shorewood, Illinois. SRP is an independent retirement plan consulting practice whose professionals advise on retirement plans, supporting plan sponsors in understanding and managing their fiduciary responsibilities to their plan, their employees, and their beneficiaries.

In addition, WELLth Advisory Services is under common ownership with the following: SRP Risk Management, LLC, SRP Ventures, LLC, SRP Ventures II, LLC, SRP Ventures III, LLC, Given to Fly, LLC, and Pretekt, LLC.

Certain WELLth Advisory Services IARs are dually registered persons with LPL. LPL is a broker-dealer that is independently owned and operated and is not affiliated with WELLth Advisory Services. Please refer to Item 12 for a

discussion of the benefits WELLth Advisory Services may receive from LPL and the conflicts of interest associated with receipt of such benefits.

Dually registered persons may recommend securities transactions for individuals or entities who are also WELLth Advisory Services clients. Under those circumstances, LPL will pay these individuals a portion of the brokerage commissions received for brokerage products that they sell. This creates an inherent conflict of interest in that an IAR may receive an investment advisory fee and a securities commission. If LPL is the broker for a plan for whom WELLth Advisory Services is providing investment advice, neither WELLth Advisory Services nor its IARs are permitted to receive any brokerage commissions generated from the plan's investments, except to the extent that those commissions are used to offset the WELLth Advisory Services advisory fee. All activities are disclosed in writing to the WELLth Advisory Services Compliance Department. IARs may receive compensation from these activities. Clients are not obligated to obtain these services through WELLth Advisory Services IARs.

As discussed previously, certain WELLth Advisory Services Investment Advisory Representatives are registered representatives with LPL. As a result of this relationship, LPL may have access to certain confidential information (e.g., financial information, investment objectives, transactions, and holdings) about WELLth Advisory Services' clients, even if the client does not establish any account through LPL. If you would like a copy of the LPL privacy policy, please contact Sarah Hughes at 866-777-4015.

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

We have established a Code of Ethics which applies to our IARs. An investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our IARs to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all IARs will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and IARs must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

If our firm or an IAR recommends to clients, or buys or sells for client accounts, securities in which our firm or an IAR has a material financial interest (excluding an interest as a shareholder of an SEC-registered, open-end investment company), we must describe our practice and discuss the conflicts of interest it presents. Neither our firm nor a related person recommends to clients, or buys or sells for client accounts, securities in which we or an IAR has a material financial interest.

If our firm or an IAR invests in the same securities (or related securities, e.g., warrants, options, or futures) that our firm or an IAR recommends to clients, we are required to describe our practice and discuss the conflicts of interest this presents and generally how we address the conflicts that arise in connection with personal trading.

IARs may buy or sell securities and other investments that are also recommended to clients. In order to minimize this conflict of interest, IARs will place client interests ahead of our own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request.

If our firm or an IAR recommends securities to clients, or buys or sells securities for client accounts, at or about the same time that you or an IAR buys or sells the same securities for our firm's (or the related person's own) account, we are required to describe our practice and discuss the conflicts of interest it presents. We are also required to describe generally how we address conflicts that arise.

IARs may buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

Item 12: Brokerage Practices

Clients may specify which broker-dealer to use for custodial services or if requested, WELLth Advisory Services may make recommendations. These recommendations are based on WELLth Advisory Services' perception of the breadth of services offered, and quality of execution. WELLth Advisory Services generally utilizes the services of LPL, Fidelity, and Charles Schwab & Co. Inc. ("Schwab").

WELLth Advisory Services will generally recommend that clients establish a brokerage account with LPL to maintain custody of clients' assets and to effect trades for their accounts. LPL provides brokerage and custodial services to independent investment advisory firms, including WELLth Advisory Services. For WELLth Advisory Services' accounts custodied at LPL, LPL generally is compensated by clients through commissions, trails, or other transaction-based fees for trades that are executed through LPL or that settle into LPL accounts. For IRA accounts, LPL generally charges account maintenance fees. In addition, LPL also charges clients miscellaneous fees and charges, such as account transfer fees. LPL charges WELLth Advisory Services an asset-based administration fee for administrative services provided by LPL. Such administration fees are not directly borne by clients but may be considered when WELLth Advisory Services negotiates its advisory fee with clients.

While LPL does not participate in, or influence the formulation of, the investment advice WELLth Advisory Services provides, certain supervised persons of WELLth Advisory Services are Dually Registered Persons. Dually Registered Persons are restricted by certain FINRA rules and policies from maintaining client accounts at another custodian or executing client transactions in such client accounts through any broker-dealer or custodian that is not approved by LPL. As a result, the use of other trading platforms must be approved not only by WELLth Advisory Services, but also by LPL.

Clients should also be aware that for accounts where LPL serves as the custodian, WELLth Advisory Services is limited to offering services and investment vehicles that are approved by LPL and may be prohibited from offering services and investment vehicles that may be available through other broker-dealers and custodians, some of which may be more suitable for a client's portfolio than the services and investment vehicles offered through LPL.

Clients should understand that not all investment advisors require that clients' custody their accounts and trade through specific broker-dealers.

Clients should also understand that LPL is responsible under FINRA rules for supervising certain business activities of WELLth Advisory Services and its Dually Registered Persons that are conducted through broker-dealers and custodians other than LPL. LPL charges a fee for its oversight of activities conducted through these other broker-dealers and custodians. This arrangement presents a conflict of interest because WELLth Advisory Services has a financial incentive to recommend that you maintain your account with LPL rather than with another broker-dealer or custodian to avoid incurring the oversight fee.

Transition Assistance Benefits

LPL provides various benefits and payments to Dually Registered Persons that are new to the LPL platform to assist the representative with the costs (including foregone revenues during account transition) associated with transitioning his or her business to the LPL platform (collectively referred to as "Transition Assistance"). The proceeds of such Transition Assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, providing working capital to assist in funding the Dually Registered Person's business, satisfying any outstanding debt owed to the Dually Registered Person's prior firm, offsetting account transfer fees (ACATs) payable to LPL as a result of the Dually Registered Person's clients transitioning to LPL's custodial platform, technology

set-up fees, marketing and mailing costs, stationary and licensure transfer fees, moving expenses, office space expenses, staffing support and termination fees associated with moving accounts.

The amount of the Transition Assistance payments is often significant in relation to the overall revenue earned or compensation received by the Dually Registered Person at their prior firm. Such payments are generally based on the size of the Dually Registered Person's business established at their prior firm and/or assets under custody at LPL. Please refer to the relevant Form ADV Part 2B brochure supplement for more information about the specific Transition Payments your representative receives.

Transition Assistance payments and other benefits are provided to associated persons of WELLth Advisory Services in their capacity as registered representatives of LPL. However, the receipt of Transition Assistance by such Dually Registered Persons creates conflicts of interest relating to WELLth Advisory Services' advisory business because it creates a financial incentive for WELLth Advisory Services' representatives to recommend that its clients maintain their accounts with LPL. In certain instances, the receipt of such benefits is dependent on a Dually Registered Person maintaining its clients' assets with LPL and therefore WELLth Advisory Services has an incentive to recommend that clients maintain their account with LPL in order to generate such benefits.

WELLth Advisory Services attempts to mitigate these conflicts of interest by evaluating and recommending that clients use LPL's services based on the benefits that such services provide to our clients, rather than the Transition Assistance earned by any particular Dually Registered Person. Clients should be aware of this conflict and take it into consideration in deciding whether to custody their assets in a brokerage account at LPL.

Schwab Adviser Services Disclosures – Choice of Custodian & Benefits

Certain IARs may select Schwab for their clients' custodial needs. Schwab provides WELLth Advisory Services with access to its institutional trading and custody services, which are typically not available to Schwab retail investors.

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 (e.g., mutual funds or 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. For some accounts, Schwab charges you a percentage of the dollar amount of assets in the account in lieu of commissions. In addition to commissions and asset-based fees, Schwab would charge you a flat dollar amount as a "prime broker" or "trade away" fee for each trade that, if applicable, a Third Party Asset Manager executes for our clients at a different broker-dealer, but where securities bought or the funds from securities sold are deposited (settled) into your Schwab account. These fees would be in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we seek and encourage you and your IAR to execute trading costs through the Schwab (or other custodians that you may utilize as part of WELLth Advisory Services' service). Trading away can sacrifice best execution and incur additional costs from the other firm, as well as fees from our custodians to transfer in those positions.

Products and Services Available to Us from Schwab

Schwab Adviser Services™ serves independent investment advisory firms like WELLth Advisory Services. They provide our clients with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not available to Schwab retail customers. However, certain retail investors may be able to get institutional brokerage services from Schwab without going through us. Schwab also makes available various support services. Some of those services help us manage and grow our business. Schwab's support services are generally available on an unsolicited business (WELLth Advisory Services does not have to request them) and at no cost to us. The following material provides a more detailed description of Schwab support services.

Services that benefit you.

Schwab institutional brokerage services include access to a broad range of investment products, execution of securities transactions and custody of client assets. The investment products made available through Schwab include some of which you might not otherwise have access to or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Service that do not directly benefit you.

Schwab also makes available other products and services that benefit us but do not directly benefit you and or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Schwab's own and that of 3rd parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained in Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from other clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

We do not open accounts for you, although we may assist you in doing so. To the extent that your account is maintained at Schwab (or any other WELLth Advisory Services' other custodians for that matter), and most trades may occur through Schwab or such other designated custodian, such custodians have the ability to use other brokers to execute trades for your account.

Your Brokerage and Custody Costs

For our client's 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 ETDs) 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. For some accounts, Schwab charges you a percentage of the dollar amount of the assets in the account in lieu of commissions.

Services that generally benefit only us.

Schwab also offers other services intended to help us manage and further develop our business enterprise. The services include:

- Educational conference and events;
- Consulting on technology and business needs;
- Consulting on legal and compliance-related needs;
- Publications and conferences on practice management and business succession;
- Access to employee benefits providers, human capital consultants and insurance providers; and
- Marketing consulting and support.

WELLth Advisory Services intends to use the benefit to cover some of the costs of its annual sales and due diligence conference for our investment advisory personnel and supervised persons. This is being included as a conflict of interest. It serves as an incentive to use Schwab over other custodians.

At the same time, WELLth Advisory Services included a disclosure that WELLth Advisory Services obtains financial benefit when WELLth Advisory Services or its personnel invite product providers, such as a mutual fund company, insurance company and private placement sponsor, to a meal, educational or entertainment events, and they pay the bills for such events.

Schwab provides some of these services itself. In other cases, it will arrange for 3rd party vendors to provide the services to us. Schwab also discounts or waives its fees for some of these services or pays all or part of the 3rd party fees. Schwab may also provide us with other benefits, such as occasional business entertainment for our personnel.

Our interest in Schwab's services, as well as the service of other Custodians.

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's ancillary services. Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf. The fact that we receive these benefits from Schwab is an incentive for us to recommend/request the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, whichever custodian we use, our selection of the custodians, whether Schwab or otherwise, as custodian and broker is driven by the Best Interest of our clients. Our selection is primarily supported by the scope, quality, and price of custodian's services and not services that benefit only us.

Research and Other Soft Dollar Benefits

WELLth Advisory Services does not engage in soft dollar benefits. WELLth Advisory Services does not use client brokerage commissions (or markups or markdowns) to obtain research or other products or services.

Block Trading: WELLth Advisory Services may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g., for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of WELLth Advisory Services' investment advisory agreements. Equity trades are blocked based upon fairness to the client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited.

Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. WELLth Advisory Services may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

Best Execution: On an annual basis, custodial broker-dealers are interviewed to compare the services and fees offered by the different firms. Best execution is not the only factor to be considered in providing investment management services to clients. We believe that both LPL and Schwab provide clients with an appropriate level of execution quality for our clients' transactions. In addition, they provide our firm and our clients with other valuable information on their accounts both electronically and by mail. They also provide a forum for advisory professionals to meet and to discuss compliance issues, rules and regulations that are important for the client and for our firm. We will review our agreement with the custodial broker-dealers on an annual basis and will compare them with firms offering comparable services to investment advisory firms and their clients.

Item 13: Review of Accounts

WELLth Advisory Services may prepare individualized reports, the nature and frequency are determined by client need and the services offered. However, as clients may request, WELLth Advisory Services may provide quarterly or semi-annual reports.

Client accounts are reviewed on a quarterly basis by the IAR, and a sampling of client accounts is reviewed on a monthly basis by the WELLth Advisory Services Compliance Department.

Generally, when WELLth Advisory Services is contracted for a financial plan, IARs do not perform ongoing account reviews unless they retain WELLth Advisory Services for those services. We are available to meet with clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

Item 14: Client Referrals and Other Compensation

WELLth Advisory Services does not engage in activity with non-clients to gain economic benefits including sales awards or other prizes. WELLth Advisory Services and/or its Dually Registered Persons are incented to join and remain affiliated with LPL and to recommend that clients establish accounts with LPL through the provision of Transition Assistance (discussed in Item 12 above). LPL also provides other compensation to WELLth Advisory Services and its Dually Registered Persons, including but not limited to, bonus payments, repayable and forgivable loans, stock awards and other benefits.

The receipt of any such compensation creates a financial incentive for the WELLth Advisory Services IAR to recommend LPL as custodian for the assets in client advisory accounts. Clients are encouraged to discuss any such conflicts of interest with the WELLth Advisory Services IAR before deciding to custody assets at LPL.

WELLth Advisory Services may act as a referring agent and may also pay referral fees (non-commission based) to independent and/or affiliated promoters/solicitors for the referral of their clients to our firm in accordance with SEC regulations. Such referral fees represent a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to you. In this regard, we maintain Promoter/Solicitors Agreements in compliance with SEC regulations. All clients referred by independent promoter/solicitors to our firm will be given full written disclosure describing the terms and fee arrangements between our firm and promoter/solicitor(s). In cases where state law requires licensure of promoter/solicitors, we ensure that no solicitation fees are paid unless the promoter/solicitor is registered as an investment advisor representative of our firm. If we are paying solicitation fees to another registered investment advisor, the licensure of individuals is the other firm's responsibility.

From time to time, we receive a client referral from certain of our affiliates, including employees of SRP and our various divisions and SRP Risk Management, LLC. In these situations, we compensate the referring affiliate for the referral. Actual payment is dictated by the role of the referring affiliate and internal organizational compensation policies. Similarly, we and/or our employees may receive internal compensation for referring prospective or current clients to affiliated SRP businesses. In these situations, referral compensation is paid by our affiliates out of their own assets and is not paid directly by the client. Clients will not be charged additional fees beyond our fees for the services provided by our affiliates. The amount of the referral credit could be calculated as a percent of the fees to be received in the referred client agreement over a specified period after the referral or as a flat fee. Such compensation policies are structured to mitigate conflicts of interest and to comply with applicable law, including regulations and guidance applicable to client portfolios subject to ERISA and the applicable securities laws and regulations.

Item 15: Custody

Our firm does not have custody of client funds or securities. Regulators generally take the position that any arrangement under which a registered investment advisor is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the advisor's instruction to the custodian is deemed to have custody of client funds and securities. As such, we have adopted the following safeguarding procedures:

1. For client accounts held at custodians other than LPL, the client must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of our firm;
2. For client accounts held at custodians other than LPL, we must send a statement to our clients showing the amount of our fee, the value of the assets upon which our fee was based, and the specific manner in which our fee was calculated;
3. We must disclose to you that it is your responsibility to verify the accuracy of our fee calculation, and that the custodian will not determine whether the fee is properly calculated; and
4. Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

We encourage our clients to raise any questions with us about the custody, safety, or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account. It is recommended that clients compare custodial brokerage statements to the reports that are provided to you by WELLth Advisory Services.

Item 16: Investment Discretion

WELLth Advisory Services maintains limited power of attorney in client accounts held at the custodial broker dealer. The limited power of attorney will grant either full or limited discretion in client accounts. The limited power of attorney authorizes WELLth Advisory Services to purchase and sell securities without obtaining the client's prior permission to execute transactions. All transactions effected on behalf of clients will be in accordance with the client's investment objectives that have been previously discussed and agreed upon with WELLth Advisory Services and the client.

Item 17: Voting Client Securities

Clients will receive proxy information from their custodial broker-dealer(s). WELLth Advisory Services requests that clients engage another party to determine how proxies should be voted. WELLth Advisory Services does not provide proxy voting services to its clients. Clients may contact their WELLth Advisory Services IAR by telephone or email if they have questions.

Item 18: Financial Information

As an investment advisory firm that maintains discretionary authority, we are required to disclose any financial condition that would be likely to impair our ability to meet our contractual and fiduciary obligations to our clients. WELLth Advisory Services has no such financial conditions to report. WELLth Advisory Services is not and has not been the subject of a bankruptcy proceeding.

When conducting financial planning services, WELLth Advisory Services may require a portion of a financial planning fee in advance but will not require or solicit prepayment of fees in excess of \$1,200.00 and six months or more in advance. Additionally, we do not take custody of client funds or securities. Therefore, we are not required to file financial information with the SEC or with the states where WELLth Advisory Services is notice filed.

Additional Information

IARs will be required to meet the qualification requirements of the states where WELLth Advisory Services conducts its advisory business.

Professional Certifications

Certain WELLth Advisory Services IARs may have earned professional certifications and designations that are required to be explained in further detail. This information will appear on each individual IAR's ADV 2B which supplements information contained in this ADV 2A brochure. The following are the most recognized designation that many of our IARs hold:

Certified Financial Planner™ (CFP®): Certified Financial Planners are licensed by the CFP® Board to display the CFP® mark. Candidates for the CFP® designation must meet the following requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP® Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three years qualifying full-time work experience.
- Successfully passing the Candidate Fitness Standards and background check.

WELLth Advisory Services Privacy Policy

We recognize our obligation to keep information about you secure and confidential. It is important for you to know that we do not sell your information to anyone. We restrict access to non-public personal information about you to those IARs and employees who need to know that information to provide products or services to you. We also maintain physical, electronic, and procedural safeguards to guard your non-public personal information.

WELLth Advisory Services Business Continuity Plan

In accordance with federal requirements WELLth Advisory Services maintains a Business Continuity Plan that describes what steps will be taken to ensure the continuity of our business operation in the event of an unanticipated disaster. The plan has been designed with procedures to ensure that client documentation will be accessible and that contact between WELLth Advisory Services, and its clients will be sustained. If you would like to receive a copy of the WELLth Advisory Services Business Continuity Plan, please contact our office.