

FORM ADV PART 2A

LifeCourse Capital, Inc.

8331 Madison Blvd., Ste. 100
Madison, AL 35758
P: 256-489-4400
www.LCCapital.net

March 27, 2024

This brochure provides information about the qualifications and business practices of LifeCourse Capital, Inc. If you have any questions about the contents of this Brochure, please contact us at 256-489-4400 and/or Michael@lccapital.net. 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 LifeCourse Capital, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/number for LifeCourse Capital, Inc. is 128583

Any references to LifeCourse Capital, Inc. as a registered investment advisor or its related persons as registered advisory representatives, does not imply a certain level of skill or training.

MATERIAL CHANGES

The Material Changes section of this brochure is updated annually to describe material changes that have occurred since the last annual update of our Form ADV Part 2A (the “Brochure”), on March 27, 2024,

Item 4 has been updated with the firm's assets under management calculation as of December 31, 2023.

Our brochure may be requested free of charge by contacting Michael Jones at 256-489-4400 and/or Michael@lccapital.net. Additional information about LifeCourse Capital, Inc. is also available via the SEC's website www.adviser.sec.gov. The website also provides information about any persons affiliated with LifeCourse Capital, Inc. who are registered, or are required to be registered, as investment adviser representatives of LifeCourse Capital, Inc.

Item 3 - TABLE OF CONTENTS

Item 1 – COVER PAGE	Cover Page
Item 2 - MATERIAL CHANGES.....	2
Item 3 - TABLE OF CONTENTS	3
Item 4 - ADVISORY BUSINESS	4
Investment Management Services.....	5
Qualified Plan Asset Allocation	6
Financial Planning and Consulting Services	6
General Information.....	6
Item 5 - FEES AND COMPENSATION.....	7
Asset Management Services	7
Termination Provisions.....	8
Qualified Plan Asset Allocation	9
Financial Planning and Consulting Services	10
Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT	10
Item 7 - TYPES OF CLIENTS.....	10
Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS	10
Item 9 - DISCIPLINARY INFORMATION	11
Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS	11
Item 11 -CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING ..	12
Item 12 - BROKERAGE PRACTICES	13
Item 13 - REVIEW OF ACCOUNTS	15
Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION.....	15
Item 15 - CUSTODY.....	16
Item 16 - INVESTMENT DISCRETION	16
Item 17 - VOTING CLIENT SECURITIES	17
Item 18 - FINANCIAL INFORMATION	17

Item 4 - ADVISORY BUSINESS

In this brochure, references to “we”, “us”, “our”, “our firm”, “the firm” and “LifeCourse refers to LifeCourse Capital, Inc. Individuals who serve as our directors, officers, and representatives are referred to as our “advisors” “investment advisory representatives” or “IARs”. Our firm’s clients are referred to as “you” “your” or “our clients”.

- A. LifeCourse was established in November of 2001. LifeCourse is wholly owned by Stephen and Deena Williams
- B. Our firm offers the following advisory services. As previously stated, each of the services is more fully described below.
 - Investment Management
 - Qualified Plan Asset Allocation
 - Financial Planning and Consulting
- C. LifeCourse tailors the advisory services it offers to your individual needs. You may impose restrictions and/or limitations on investments in certain securities or types of securities. We will ask you to complete a client account form to assist us with obtaining information about your financial situation and history. You should expect at least two meetings before implementation begins. The first meeting LifeCourse conducts is an interview and data gathering session to obtain a complete picture of your financial situation, goals, objectives, concerns and risk profile. The information gathered by LifeCourse will assist LifeCourse to provide you with the requested services and customize the services to your financial situation. Depending on the services you have requested, LifeCourse will gather various financial information and history from you including, but not limited to:
 - Retirement and financial goals
 - Investment objectives
 - Investment horizon
 - Financial needs
 - Cash flow analysis
 - Cost of living needs
 - Education needs
 - Savings tendencies
 - Other applicable financial information required by LifeCourse in order to provide the investment advisory services requested.
- D. LifeCourse does not participate in any wrap fee programs.
- E. As of December 31, 2023 we have \$124,457,007 of client assets under our discretionary management and \$1,970,975 of client assets under non-discretionary management. LifeCourse does not have non-discretionary assets under management.

Investment Management Services

LifeCourse offers a model portfolio management platform. We have designed four model portfolios. Generally, clients' accounts are managed based on the model(s) selected for the client. Therefore, you are advised that your account will be similarly managed and potentially identical to another client's account in the same model. If a change is made to the model, the change will be applied across all clients' accounts invested like the model.

The model portfolio platform consists of four models that are passively managed.

- a) Conservative
- b) Moderate
- c) Growth
- d) Aggressive

The four passively managed portfolios are reviewed and monitored on a quarterly basis. Rebalancing and reallocation are done on a quarterly or annual basis or more frequently if deemed appropriate by LifeCourse.

The conservative portfolio is designed for clients primarily seeking current income and low to moderate capital growth. The moderate portfolio is designed for clients primarily seeking capital growth and some current income. The growth portfolio is designed for clients primarily seeking capital growth without any need for income. The aggressive portfolio is designed for clients with a long-term horizon who are primarily seeking to maximize their long-term returns rather than minimizing short-term fluctuation.

LifeCourse will provide continuous and ongoing management of your account. Unless otherwise expressly requested by you, we will manage the account on a discretionary basis and will make changes to the allocation as we deem appropriate. LifeCourse will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with you. We may actively trade securities and hold such holdings for periods of 30 days or less or maintain positions for longer or shorter-term periods.

If you elect to have your accounts managed on a nondiscretionary basis, no changes will be made to the allocation of your account without prior consultation with you and your expressed agreement. Non-discretionary accounts carry risks including the risk of missing market opportunities since transactions cannot be implemented without your expressed authorization. Additionally, costs may be higher since your transactions may not participate in block or aggregated orders.

You are advised that transactions in the account, account reallocations and rebalancing may trigger a taxable event for you, with the exception of IRA accounts, 403(b) accounts and other qualified retirement accounts. Since accounts are managed based on the model, LifeCourse does not take

LifeCourse Capital, Inc.

into consideration each client's individual tax situation when conducting transactions in client accounts. Therefore, you are advised that the managed account platforms may not be tax efficient.

Qualified Plan Asset Allocation

Clients who want asset allocation recommendations for their individual company retirement accounts can engage our firm for asset allocation recommendations. However, we will not participate in the execution of the transactions and will not have access to our clients' qualified plan accounts. Implementation is solely at the client's discretion.

Our firm will provide our clients with suggested allocation changes to their qualified plan account via email. Our allocation advice will be limited to the options available within the client's qualified plan options.

Financial Planning and Consulting Services

LifeCourse may provide financial planning and consulting in conjunction with investment management services. This may include general non-securities advice on topics that may include insurance, tax and budgetary planning, estate planning and business planning. These services do not generate a separate fee.

Plans are based on your financial situation at the time and are based on financial information disclosed by you to LifeCourse. You are advised that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is not an indication of future performance. LifeCourse cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, you must continue to review the plan and update the plan based upon changes in your financial situation, goals, or objectives or changes in the economy. Should your financial situation or investment goals or objectives change, you must notify us promptly of the changes. You are advised that the advice offered by LifeCourse may be limited and is not meant to be comprehensive. Therefore, you may need to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

You are not obligated to implement advice through LifeCourse or our investment advisory representatives. Should you implement the plan with LifeCourse's investment advisory representatives, commissions or other compensation may be received in addition to the advisory fee paid to LifeCourse.

General Information

You are advised the investment recommendations and advice offered by LifeCourse are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. You are advised that it is necessary to inform LifeCourse

promptly with respect to any changes in your financial situation and investment goals and objectives. Failure to notify LifeCourse of any such changes could result in investment recommendations not meeting your needs.

Item 5 - FEES AND COMPENSATION

Asset Management Services

- A. Our fees are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds in your account.

Our fees are billed as a percentage of the managed funds as follows:

Asset Allocation Models	
Billed Annually	Total Household Funds under Management
1.25%	\$0 - \$24,999
1.00%	\$25,000 - \$199,999
0.90%	\$200,000 - \$499,999
0.75%	\$500,000 - \$999,999
0.60%	\$1,000,000 - up

Bond Models	
Billed Annually	Total Household Funds under Management
1.00%	\$0 - \$199,999
0.90%	\$200,000 - \$499,999
0.75%	\$500,000 - \$999,999
0.60%	\$1,000,000 - up

All “related” fee-based accounts are added together to determine the fee breakpoints. Related accounts are accounts of an individual, his or her spouse, and their children under the age of 21. Additionally, related accounts include individually owned accounts, individual IRA’s, self directed accounts (i.e. directed by individual participants) under an employee benefit pension plan (“ERISA” plan), and ERISA plans in which an individual is the sole participant. Furthermore, accounts of the same corporation or business entity are normally deemed as “related.” For example, if ABC Manufacturing has both a profit-sharing plan and a pension plan (non-directed), these two accounts will be related. However, corporate accounts such as corporate cash would not be related to the retirement plan accounts.

LifeCourse may change the above fee schedules upon 30-days prior written notice to you.

- B. Advisory fees will generally be collected directly from your account, provided you have given LifeCourse written authorization. you will be provided with an account statement reflecting the deduction of the advisory fee direct from the account custodian. If the Account does not

LifeCourse Capital, Inc.

contain sufficient funds to pay advisory fees, LifeCourse has limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. You may reimburse the account for advisory fees paid to LifeCourse, except for ERISA and IRA accounts.

- C. In addition to the advisory fees above, you will pay transaction fees for securities transactions executed in your account in accordance with the custodian's transaction fee schedule. Additionally, you may pay fees for custodial services, account maintenance fees, transaction fees, and other fees associated with maintaining the Account. Such fees are not charged by LifeCourse and are charged by the product, broker/dealer or account custodian. Our firm does not share in any portion of such fees. Additionally, you may pay your proportionate share of the fund's management and administrative fees and sales charges as well as the mutual fund adviser's fee of any mutual fund they purchase. Such advisory fees are not shared with LifeCourse and are compensation to the fund-manager.
- D. LifeCourse's advisory fees are paid quarterly in advance. Fees are based on the account's asset value as of the last business day of the prior calendar quarter. Fees are prorated for accounts opened during the quarter. Therefore, the initial quarterly fee (if the account is established on a day other than the first day of the quarter) will be a pro-rated portion of the fee based on the number of days remaining in the quarter.
- E. You are advised that investment advisory representatives ("IARs") of LifeCourse are also registered representatives of NEXT Financial Inc. ("NEXT"), an unaffiliated registered broker/dealer that is a member of the Financial Regulatory Authority (FINRA) and SIPC. IARs of LifeCourse who are registered representatives of NEXT receive trail commissions (i.e. 12b-1 fees) for a period of time as a result of directing securities transactions through NEXT. Some load and no-load mutual funds may pay annual distribution fees, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. The 12b-1 fees come from mutual fund assets, which are charged to the investor. The 12b-1 fees are paid to NEXT, a portion of which are passed to our IARs who are registered representatives of NEXT. The receipt of such fees could represent a potential conflict of interest. As stated above, IARs of LifeCourse may recommend mutual funds that pay 12b-1 fees and no-load funds as registered representatives of NEXT.

You may purchase the securities recommended by LifeCourse directly or through other brokers or agents not affiliated with LifeCourse.

Termination Provisions

Clients will have a period of five (5) business days from the date of signing the investment advisory agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the investment advisory agreement with 30 days written notice. Upon termination, fees will be prorated to the date of termination and the unearned portion of the fee will be refunded to the client.

Financial Planning and Consulting Services

Fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or products purchased such as securities or insurance.

Hourly fees are typically charged for isolated consultation arrangements. LifeCourse will attempt to define the services and the time required to provide the requested services and quote you a fixed fee.

Fees are negotiable. Your fees will be dependent on several factors including time spent with LifeCourse, number of meetings, complexity of your situation, amount of research, services requested and staff resources.

Fee Type	Maximum Fee	Payable
Fixed Fee	\$600	Fees are due upon presentation of the plan or analysis.
Hourly Fee	\$100 per hour	Fees are due upon presentation of the plan or analysis.

In some circumstances, implementing the recommendations in financial plans may involve investment or insurance products that result in a commission or other fee being paid to a registered representative of a broker / dealer. , some of our advisors are registered insurance agents and may receive commissions for fixed and variable insurance products. In instances where a client pays a fee for financial planning advice, the client is notified in advance of any such transactions resulting in a commission being paid to an associated person of LifeCourse

Termination Provisions

You may terminate advisory services obtained from LifeCourse, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with LifeCourse. Thereafter, you may terminate advisory services upon LifeCourse's receipt of your written notice to terminate. You will be responsible for any time spent by LifeCourse.

Item 6 - PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

We do not charge any performance-based fees (fees based on a share of capital gains or on capital appreciation of your assets).

Item 7 - TYPES OF CLIENTS

LifeCourse's services are geared toward individuals both high net worth and other than high net worth individuals. Our minimum account size is \$200,000 of assets under management which may be waived by the investment advisor based on the client's needs and individual circumstances.

Item 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

- A. LifeCourse conducts fundamental analysis, technical analysis and charting analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Technical analysis generally involves studying trends and movements in a security's price, trading volume, and other market-related factors in an attempt to discern patterns. Charting is a form of technical analysis in which various factors are diagrammed in order to illustrate patterns.

We select mutual funds and exchange traded funds (ETFs) investment vehicles exclusively to represent each investment category for our model portfolios. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers, and fund straying from its objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day.

The following general criteria are used to select mutual funds for the model portfolios. Funds chosen are institutional or institutional-equivalent. The share classes are selected with the following characteristics:

- Market performance that exceed comparative indexes on a 1-year, 3-year and 5-year basis.
- High comparative correlation – the degree to which the fund matches the stated index or sector.
- Low expense ratios - percentage of funds' assets to operating costs.
- Low turnover ratios that measure efficiency and tax minimization.
- A review of the funds' largest holdings.

Our selection of ETFs complements the mutual fund selection for the investment categories. ETFs trade intraday like stocks. ETFs are non-managed portfolios that allow us to make timely and efficient changes when necessary and reduce the potential for unexpected capital gains. We emphasize the following factors in our selection of ETFs:

- High comparative correlation with an index
 - Low expense ratios
 - Largest constituent holdings of the ETFs
- B. You are advised investing in securities involves risk of loss, including the potential loss of principal. Therefore, your participation in any of the management programs offered by LifeCourse will require you to be prepared to bear the risk of loss and fluctuating performance.

LifeCourse does not represent, warrant or imply that the services or methods of analysis used by LifeCourse can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by LifeCourse will provide a better return than other investment strategies.

Item 9 - DISCIPLINARY INFORMATION

The Firm or its management persons have no legal and disciplinary events presumed to be material for this item. In May 2007, Stephen Williams, a part-owner of LifeCourse, was subject to a probationary period of twelve months by the State of Georgia.

Item 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

- A. One or more of the persons affiliated with LifeCourse are registered representatives of NEXT Financial Group, Inc. ("NEXT"). NEXT is registered as a full service, general securities broker-dealer, and as a registered investment adviser with the Securities and Exchange Commission ("SEC"). NEXT is also a member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and the Securities Investor Protection Corporation ("SIPC").

NEXT is a wholly owned subsidiary of NEXT Financial Holdings, Inc. NEXT Financial Holdings, Inc. is not a publicly traded company, however some Registered Representatives of NEXT may be individual stock holders in NEXT Financial Holdings, Inc. NEXT is not responsible for the advisory activities of its registered representatives that are conducted

LifeCourse Capital, Inc.

solely through LifeCourse and do not involve NEXT. LifeCourse is required to pay certain fees to NEXT Financial Group, Inc., for the oversight that NEXT is required to conduct. The payment of such fees may increase revenues to NEXT which may increase the value of NEXT Financial Holdings, Inc. shares Registered Representatives may hold. Clients should be aware that this is a perceived conflict of interest.

Because of the affiliation with NEXT, these persons may have two different but concurrent roles:

- As a registered person with NEXT who may receive commissions for recommending securities
- As an investment advisor representative of LifeCourse who may offer services outside of NEXT.

LifeCourse is not affiliated with NEXT. As a client of LifeCourse you should be clear which entity the services are being offered through, and that you have obtained the appropriate disclosure documents. It is also important to note that the information you provide for using the services of LifeCourse will be shared with NEXT for the purpose of surveilling transactions in your account(s) and for billing. Please also note that the fees charged by NEXT to the IAR will not increase your execution or brokerage charges or the fee that you have agreed to pay LifeCourse.

- B, C. LifeCourse is not and does not have a related person who is a: futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities. Further, LifeCourse is not and does not have a related person who is: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

Some of our IARS provide tax preparation services through LifeCourse Tax Service which is a division of LifeCourse.

Item 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Code Of Ethics

- A. We have a fiduciary duty to you to act in your best interest and always place your interests first and foremost. LifeCourse takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as LifeCourse's policies and procedures. Further, LifeCourse strives to handle your non-public information in such a way to protect information from falling into hands that have no business reason to know such

information and provides you with LifeCourse's Privacy Policy. As such, we maintain a code of ethics for our investment advisory representatives, supervised persons and staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about your transactions. Further, the firm's Code of Ethics establishes our expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

- B. Neither LifeCourse nor its associated persons recommends to clients or buys or sells for client accounts any securities in which we have a material financial interest.
- C. LifeCourse and its associated persons may buy or sell securities identical to those securities recommended to you. Therefore, LifeCourse and/or its associated persons may have an interest or position in certain securities that are also recommended and bought or sold to you. LifeCourse and its associated persons will not put their interests before your interest. LifeCourse and its associated persons may not trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.
- D. We maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

Prohibition on Use of Insider Information

LifeCourse has adopted policies and procedures to prevent the misuse of "insider" information (i.e. material non-public information). A copy of such policies and procedures is available to any person upon request.

Item 12 - BROKERAGE PRACTICES

- A. As previously stated, our investment advisory representatives are registered representatives of NEXT, an unaffiliated broker-dealer. As a result, they are subject to FINRA Rule 3280 which may restrict them from conducting securities transactions away from NEXT unless NEXT provides them with written authorization. LifeCourse is independently owned and operated and not affiliated with Schwab or NEXT.

You are advised that not all investment advisers require you to maintain accounts at a specific broker/dealer. You are advised you may maintain accounts at another broker/dealer. However, the services provided by LifeCourse will be limited to only advice and will not include implementation. If you select another brokerage firm for custodial and/or brokerage services you will not be able to receive asset management services from LifeCourse.

LifeCourse Capital, Inc.

In initially selecting NEXT, LifeCourse conducted due diligence. LifeCourse's evaluation and criteria includes:

- Ability to service you
- Staying power as a company
- Industry reputation
- Ability to report to you and to LifeCourse
- Availability of an efficient trading platform
- Products and services available
- Technology resources
- Educational resources
- Execution capability
- Financial responsibility and viability
- Confidentiality and security of your information
- Responsiveness
- Other factors that may bear on the overall evaluation of best price and execution

Additionally, periodically we review transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

Best execution does not simply mean the lowest transaction cost. Therefore, no single criteria will validate nor invalidate a custodian, but rather, all criteria taken together will be used in evaluating the currently utilized custodian.

You are advised there is an incentive for LifeCourse and the Advisory Representatives to recommend a broker/dealer over another based on the products and services that will be received rather than your best interest.

NEXT has a wide range of approved securities products for which NEXT performs due diligence prior to selection. NEXT's registered representatives are required to adhere to these products when implementing securities transactions through NEXT. Commissions charged for these products may be higher or lower than commissions you may be able to obtain if transactions were implemented through another broker/dealer.

LifeCourse's custodian, TD Ameritrade, also make available to our firm other products and services that benefit LifeCourse but may not directly benefit you. Some of these other products and services assist LifeCourse with managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmation and account statements); facilitate trade execution; provide research, pricing information and other market data; facilitate payment of LifeCourse's fees from your accounts; and assist with back-office functions; recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of LifeCourse's accounts not held through NEXT.

- B. LifeCourse may aggregate (“bunch”) transactions in the same security on behalf of more than one client in an effort to strive for best execution and to possibly reduce the price per share and/or other costs to clients. However, aggregated or bunched orders will not reduce the transaction costs to participating clients. We conduct aggregated transactions in a manner designed to ensure that no participating client is favored over another client. Participating clients will obtain the average price per share for the security executed that day. To the extent the aggregated order is not filled in its entirety and when possible, securities purchased or sold in an aggregated transaction will be allocated on a random basis. Under certain circumstances, the amount of securities maybe increased or decreased to avoid holding odd-lot or a small number of shares for particular clients.

Item 13 - REVIEW OF ACCOUNTS

- A. If you are participating in the Asset Management you will have reviews:

- every six (6) months for smaller accounts (i.e. accounts of \$100,000 or less)
- quarterly for accounts over \$100,000

You may request more frequent reviews and may set thresholds for triggering events that would cause a review to take place.

Accounts are reviewed for consistency with the investment strategy and performance. Reviews may be triggered by changes in an account holder’s personal, tax or financial status. Macroeconomic and company specific events may also trigger reviews.

If you are participating in Planning Services you will not receive regular reviews. LifeCourse recommends you have at least an annual review and update to any plans. However, the time and frequency of the reviews is solely your decision. Additionally, you will be charged review fees based on the fee schedule disclosed under the program. Other than the initial plan or analysis, there will be no other reports issued.

The following individuals conduct reviews:

Michael Jones , President, Advisory Representative
Allen Sandlin, Advisory Representative
Stephen Williams , Advisory Representative

- B. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require him review the portfolio allocation and make recommendations for changes.

Item 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Product vendors recommended by LifeCourse may provide monetary and non-monetary assistance with client events, provide educational tools and resources. As part of our fiduciary duty we endeavor at all times to put the interests of our Clients first and foremost. Clients should be aware,

however, that these benefits in and of themselves create a potential conflict of interest. LifeCourse does not directly or indirectly compensate any person who is not a supervised person of LifeCourse for referrals. Further, LifeCourse does not receive an economic benefit from a non-client for providing investment advice or advisory services to you.

Some of our IARs are registered insurance agents and may occasionally receive commissions with your advance notice on fixed and variable insurance products that are in addition to our investment management and financial planning fees. As noted above under *Item 10: "Other Industry Activities and Affiliations"*, some of our IARS provide tax preparation services through LifeCourse Tax Service which is a division of LifeCourse and may receive separate fees with advance notice for providing these services to you.

Item 15 - CUSTODY

With the exception of deduction of LifeCourse's advisory fees from your accounts, LifeCourse does not take custody of your funds or securities.

Under government regulations, we are deemed to have custody of your assets if, for example, you authorize us to instruct your account custodian to deduct our advisory fees directly from your account or if you grant us authority to move your money to another person's account. Your account custodian maintains actual custody of your assets. You will receive account statements directly from your account custodian at least quarterly. They will be sent to the email or postal mailing address you provided. You should carefully review those statements promptly when you receive them.

Item 16 - INVESTMENT DISCRETION

You may grant LifeCourse authorization to manage your account on a discretionary basis. You will grant such authority to LifeCourse by execution of the advisory agreement. You may terminate discretionary authorization at any time upon receipt of written notice by LifeCourse.

Additionally, you are advised that:

- 1) You may set parameters with respect to when account should be rebalanced and set trading restrictions or limitations;
- 2) Your written consent is required to establish any mutual fund, variable annuity, or brokerage account;
- 3) LifeCourse requires the use of the broker/dealer with which your Advisory Representative is registered for sales in commissionable mutual funds or variable annuities, if you elect to implement recommendations through your Advisory Representative;
- 4) With the exception of deduction of LifeCourse's advisory fees from the account, if you have

authorized automatic deductions, LifeCourse will not have the ability to withdraw your funds or securities from the account.

Item 17 - VOTING CLIENT SECURITIES

LifeCourse does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact LifeCourse about questions you may have an opinion on how to vote the proxies. However, the voting and how you vote the proxies is solely your decision.

Item 18 - FINANCIAL INFORMATION

- A. As stated above, LifeCourse has discretionary authority over client accounts; however that authority does not extend to the withdrawal of any client assets, with the exception of deduction of LifeCourse's advisory fees from your accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contract actual commitment to you or any other client.
- B. Neither LifeCourse nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.
- C. On April 13, 2020, due to the economic uncertainty at the time, we applied for a PPP loan (Paycheck Protection Program loan) offered through the U.S. Small Business Administration. We were granted a loan of \$ 45,000. Over the last two years due to the buoyancy of the market and the confidence of our clients, our financial position has not been significantly impacted. The loan is not reasonably likely to have a material effect on our financial condition or the results of our operations going forward.