

Authentic Counsel, LLC

dba WealthBuilders Investments

Form ADV Part 2A – Disclosure Brochure

Effective: March 28, 2024

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Authentic Counsel, LLC (“WealthBuilders Investments” or the “Advisor”). The Advisor conducts business WealthBuilders Investments. If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (972) 719-2557.

WealthBuilders Investments is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about WealthBuilders Investments to assist you in determining whether to retain the Advisor.

Additional information about WealthBuilders Investments and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 173306.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of WealthBuilders Investments. For convenience, the Advisor has combined these documents into a single disclosure document.

WealthBuilders Investments believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. WealthBuilders Investments encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor now serves as the Investment Manager to an affiliated Private Fund. Please See Item 4, Item 5, Item 10, and Item 15.
- The Advisor has amended Item 12 and Item 14 to reflect that TD Ameritrade will no longer be recommended as a Custodian.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 173306. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (972) 719-2557.

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Item 4 – Advisory Services

A. Firm Information

Authentic Counsel, LLC (“WealthBuilders Investments ” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Limited Liability Company (LLC) in March 2011 under the laws of the State of Colorado. WealthBuilders Investments became a registered investment advisor in January 2015 and is owned by CK Venture Holdings, LLC and WealthBuilders Holdings Corp. The Advisor is operated by Chad Frantzen (Founder and Chief Compliance Officer). The Advisor conducts business under WealthBuilders Investments. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Authentic Counsel, LLC.

B. Advisory Services Offered

Authentic Counsel, LLC offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and charitable organizations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. WealthBuilders Investments’ fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

WealthBuilders Investments provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and related advisory services. WealthBuilders Investments works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. WealthBuilders Investments will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, REITs or alternative investments to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

WealthBuilders Investments’ investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. WealthBuilders Investments will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

WealthBuilders Investments evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. WealthBuilders Investments may recommend, on occasion, redistributing investment allocations to diversify the portfolio. WealthBuilders Investments may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. WealthBuilders Investments may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

Use of Independent Managers

WealthBuilders Investments will recommend that Clients utilize one or more unaffiliated investment managers or investment platforms (collectively “Independent Managers”) for all or a portion of a Client’s investment portfolio, based on the Client’s needs and objectives. The Advisor will perform initial and ongoing oversight and due diligence over each Independent Manager to ensure the strategy remains aligned with Client’s investment objectives and overall best interests. The Advisor will also assist the Client in the development of the initial policy

recommendations and managing the ongoing Client relationship. The Client will be provided with the Independent Manager's Form ADV Part 2A - Disclosure Brochure (or a brochure that makes the appropriate disclosures).

For certain accounts, WealthBuilders Investments may recommend that all or a portion of a Client's investment portfolio be established through an online investment management program offered by WealthBuilders Investments and the Custodian, Charles Schwab, Inc or LPL Financial. Under this service, Clients will engage WealthBuilders Investments through an investment management agreement for these advisory services and then establish an online account through Schwab Wealth Investment Advisory, Inc. ("SWII"), a subsidiary of Charles Schwab, Inc. SWII is what is often termed a "robo-advisor", an online wealth management service that provides automated, algorithm-based portfolio management advice. Robo-advisors use technology to deliver similar services as traditional advisors, but generally only offer portfolio management and do not get involved in a Client's personal situation, such as taxes and retirement or estate planning. WealthBuilders Investments chose to affiliate with SWII due to the Investment Platform's customized portfolio allocations, automated rebalancing, and competitive fees. WealthBuilders Investments utilizes SWII to provide additional diversity, continuous rebalancing, and a rational and balanced approach to the management of smaller accounts, generally lower than the Advisor's required relationship size.

WealthBuilders Investments will have the discretionary authority to instruct SWII with respect to portfolio construction, asset allocation and other investment decisions, subject to the limitations described herein. SWII will implement the portfolio and be responsible for the discretionary trading of the ETFs in the Client's portfolio, including the purchase and sale of investments and the automatic rebalancing back to targets.

SWII utilizes ETF's, representing various asset classes for the construction of investment portfolios. As discussed above, WealthBuilders Investments will work with each Client to select/construct a portfolio to meets the needs of the Client. The Client has limited ability to put restrictions on its accounts. The account[s] cannot contain investments that are not included in the SWII universe of ETFs and cash equivalents.

WealthBuilders Investments will delegate limited investment discretion to SWII to implement trading and rebalancing within the parameters of the Advisor's investment strategies. The Advisor's investment philosophy is long-term, but the Advisor may make such tactical overrides to take advantage of market pricing anomalies or strong market sectors. The Advisor will not actively trade in the Client's account[s]. Client accounts must maintain a minimum balance of \$5,000 to be eligible for automatic rebalancing.

For its services, SWII will charge an asset-based fee that is in addition to the Advisor's fee. SWII's fee includes the securities transaction fees for all trades. The Advisor will only receive its investment advisory fees as detailed in Item 5.A. below and does not share in any fees earned by SWII.

The Advisor will provide the Client with SWII's current Form ADV2A – Disclosure Brochure (or a brochure that contains all required disclosures). The Advisor's investment advisory fee is added to the SWII platform fee, which also includes securities transaction fees. The Advisor does not share in any fees charged by SWII. The Advisor shall only earn its fees as described in Item 5 below. For additional information regarding the brokerage practices for SWII accounts, please see Item 12.

Retirement Accounts – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will WealthBuilders Investments accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Private Fund Management Services

WealthBuilders Investments serves as investment adviser to Solomon Fund I, LP (the "Fund") an exempt-from-registration pooled investment vehicle.

Solomon Fund I GP, LLC, an affiliated entity, will serve as the general partner of the Fund. Thus, WealthBuilders Investments will not be independent of the Fund. Also refer to Item 5 – Fees and Compensation, Item 10 – Other Financial Industry Activities and Affiliations, and Item 16 – Custody of this Disclosure Brochure for more information.

The service is detailed in the offering document of the Fund, which include as applicable, operating agreements, private placement memorandum and/or term sheets, subscription agreements, separate disclosure documents, and all amendments thereto ("Offering Document").

The Advisor manages the Fund based on the investment objectives, policies and guidelines as set forth in the respective Offering Document and not in accordance with the individual needs or objectives of any particular investor therein. Each prospective investor interested in investing in a Fund is required to complete a subscription agreement in which the prospective investor attests as to whether or not such prospective investor meets the qualifications to invest in the Fund and further acknowledges and accepts the various risk factors associated with such an investment. In general, investors in the Funds are not permitted to impose restrictions or limitations.

The Advisor will recommend that certain Clients invest in the Fund. The recommendation to invest in the Fund poses a conflict between the interests of the Advisor and the interests of the Client, as the Advisor is incentivized to increase the amount of assets in the Fund, not already managed by the Advisor, in order to increase the revenue generated to the Advisor. This conflict is mitigated as Clients will only pay the asset-based fee as described in the Offering Document. The Advisor will not receive investment advisory fees for its management of assets invested in the Fund. Clients of the Advisor are under no obligation to invest in the Fund.

For more detailed information on investment objectives, policies and guidelines, please refer to the Fund's Offering Document.

Financial Planning Services

WealthBuilders Investments will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a Client's financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

WealthBuilders Investments may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging WealthBuilders Investments to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – WealthBuilders Investments, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – WealthBuilders Investments will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – WealthBuilders Investments will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – WealthBuilders Investments will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

WealthBuilders Investments includes, in addition to administrative fees (herein "Covered Costs together with its investment advisory fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program". The Advisor customizes its investment management services for its Clients. The Advisor sponsors the WealthBuilders Investments Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

E. Assets Under Management

As of December 31, 2023, WealthBuilders Investments manages \$121,666,733 in Client assets, \$120,722,855 of which are managed on a discretionary basis and \$943,878 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one more written agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. The Advisor has two tiered fee schedules for equity and fixed income portfolios.

Equity Portfolio Tiered Fee Schedule:

Assets Under Management (\$)	Annual Rate (%)
\$0 to \$250,000	1.50%
\$250,001 to \$500,000	1.25%
\$500,001 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.90%
\$2,000,001 to \$5,000,000	0.80%
\$5,000,001 to \$10,000,000	0.70%
\$10,000,001 to above	negotiable

*The Advisor charges a minimum fee of \$500 for investment management services

Fixed Income Portfolio Tiered Fee Schedule:

Assets Under Management (\$)	Annual Rate (%)
\$0 to \$500,000	0.80%
\$500,001 to \$2,000,000	0.70%
\$2,000,001 to \$5,000,000	0.60%
\$5,000,001 to above	negotiable

Wrap Fee Schedule:

Assets Under Management (\$)	Annual Rate (%)
\$0 to \$250,000	1.55%
\$250,001 to \$500,000	1.30%
\$500,001 to \$1,000,000	1.05%
\$1,000,001 to \$2,000,000	0.95%
\$2,000,001 to \$5,000,000	0.85%
\$5,000,001 to \$10,000,000	0.75%
\$10,000,001 to above	negotiable

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by WealthBuilders Investments will be independently valued by the Custodian. The Advisor will conduct periodic reviews of the Custodian's valuations.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described above. The Advisor will allocate a portion of the advisory fee collected to the Independent Manager pursuant to the terms of the executed agreement between the Advisor and the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

Private Fund Management Services

The fee for private fund management services is 2.00% annually. Private fund management fees during the Subscription Period and Investment Period, as defined in the Offering Document, are based on the aggregate capital committed and contributed to the Fund during the Subscription Period and Investment Period. Subsequent to the expiration of the Investment Period, the fee will be based on the aggregate cost basis of assets held by the Fund, based on the good faith determination of the General Partner.

Private fund management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the Investment Management Agreement between the Advisor and the Fund. The Advisor will not receive investment advisory fees for its management of Client assets invested in the Fund. Investors should refer to the Fund's Offering Document for more detailed information on fees and compensation.

Financial Planning Services

WealthBuilders Investments offers financial planning services either on an hourly basis or a fixed engagement fee. Hourly fees are billed at \$350 per hour. Fixed fees range from \$750 to \$10,000. The Advisor may also be engaged for ongoing financial planning services payable through an annual retainer fee. Annual retainer fees are at a fixed annual rate of \$1,995. The Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services.

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with WealthBuilders Investments at the end of the prior quarter. The Advisor typically deducts the advisory fee two weeks after the beginning of the new quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. Clients are urged to also review and compare the statement provided by the Advisor to the brokerage statement from the Custodian, as the Custodian does not perform a verification of fees. Clients provide written authorization permitting advisory fees to be deducted by WealthBuilders Investments to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

For Client accounts implemented through an Independent Manager, the Client's overall fees will include WealthBuilders Investments' investment advisory fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. WealthBuilders Investments includes Covered Costs as part of its overall investment advisory fee through the WealthBuilders Investments Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to WealthBuilders Investments for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of WealthBuilders Investments, but would not receive the services provided by WealthBuilders Investments which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by WealthBuilders Investments to fully understand the total

fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

WealthBuilders Investments may be compensated for its investment management services in advance of the quarter in which services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

In the event that the Advisor has determined that an Independent Manager is no longer in the Client's best interest, or a Client should wish to terminate their relationship with the Independent Manager, the terms for termination are set forth in the respective agreements between the Client, the Advisor and the Independent Managers. WealthBuilders Investments will assist the Client with the termination and transition as appropriate.

Private Fund Management Services

Investors should refer to the Fund's Limited Partnership Agreement for information regarding withdrawals.

Financial Planning Services

WealthBuilders Investments requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee and annual retainer engagements, the percentage of the engagement scope completed by the Advisor. Upon termination, the Advisor will refund any unearned, prepaid planning fees from the effective date of termination to the end of the quarter. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

WealthBuilders Investments does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Chad Frantzen is also a registered representative of Cabin Securities, Inc. ("Cabin Securities"). Cabin Securities is a registered broker-dealer (CRD No. 137608) member FINRA, SIPC. In his separate capacity as a registered representative of Cabin Securities, Mr. Frantzen will implement securities transactions under Cabin Securities and not through WealthBuilders Investments. In such instances, he will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by Mr. Frantzen in his capacity as a registered representative is separate and in addition to the Advisor's fees. This practice presents a conflict of interest because Mr. Frantzen who is a registered representative has an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. Clients are not obligated to implement any recommendation provided by the Advisor nor Mr. Frantzen. Neither the Advisor nor Mr. Frantzen will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Frantzen's separate capacity as a registered representative. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Mr. Frantzen also licensed as an independent insurance professional. He will earn commission-based compensation for selling insurance products, including insurance products he sells to Clients. Insurance commissions earned by Mr. Frantzen are separate and in addition to advisory fees. This practice presents a conflict of interest because Mr. Frantzen providing investment advice on behalf of the Advisor who is an insurance agent

has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Frantzen's affiliation with the Advisor. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

WealthBuilders Investments does not charge performance-based fees for its investment advisory services. The fees charged by WealthBuilders Investments are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Item 7 – Types of Clients

WealthBuilders Investments offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and, charitable organizations. The amount of each type of Client is available on WealthBuilders Investments' Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. WealthBuilders Investments generally does not impose a minimum relationship size.

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

A. Methods of Analysis

WealthBuilders Investments primarily employs fundamental, technical, cyclical, methods in developing investment strategies for its Clients. In addition, WealthBuilders Investments will screen potential investments for social impact and alignment with Christian values. In doing so, WealthBuilders Investments follows the principals of both Biblically Responsible Investing and Socially Responsible Investing practices.

Research and analysis from WealthBuilders Investments are derived from numerous sources, including but not limited to ChurchillManagement Group, Mauldin Research, Clearnomics, Hedgeye, and WealthShield.

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

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

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

Biblically Responsible Investing is an investment decision making process that applies Christian values regarding moral and social principles to help an Advisor determine which securities to invest in.

Socially Responsible Investing an investment decision making process that identifies securities considered to be positive sustainable or societal impact.

As noted above, WealthBuilders Investments generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. WealthBuilders Investments will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, WealthBuilders Investments may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. WealthBuilders Investments will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Gains and losses of alternative investments are passed through investors

and if invested in Individual Retirement Accounts (“IRAs”) these products may carry taxable income that investors should be informed about and prepared to bear. Client should only have a portion of their assets in these investments.

Real Estate Investment Trusts (“REITs”)

Investing in Real Estate Investment Trusts (“REITs”) involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Oil and Gas Interests

Investing oil and gas interest whether directly or as part of a fund/ETF involves distinct risks. The price of oil and gas interests may fluctuate to a greater degree than other securities and contain additional risks based on the supply and demand for oil and gas. Some of these additional risks include, the ability to obtain reliable oil and gas supply, oil and gas reserve estimates, the ability to locate markets for oil and gas, fluctuations in prices. The values of oil and gas interests are subject to market risk by a range of variables that could cause trends to differ materially.

Digital Assets Risks

Digital assets are highly speculative and volatile investments that may become illiquid at any time. Digital assets are loosely regulated. A Client could lose the entire value of their investment in digital assets and is only suitable for Clients with a high risk tolerance. The Advisor only uses Digital Assets through Independent Managers.

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

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving WealthBuilders Investments or its owners.

WealthBuilders Investments values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 173306.

Item 10 – Other Financial Industry Activities and Affiliations

Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its investment advisory fee as described in Item 5.A. However, the Independent Manager will calculate and deduct a single, overall fee from the Client's account[s] at the Custodian and remit the appropriate amount to the Advisor. All fees will be fully disclosed to the Client.

Insurance Agency Affiliations

As noted in Item 5, Mr. Frantzen is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with WealthBuilders Investments. As an insurance professional, Mr. Frantzen will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Frantzen is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Frantzen or the Advisor.

Broker-Dealer Affiliation

As noted in Item 5, certain Mr. Frantzen is also a registered representative of Cabin Securities. Cabin Securities is a registered broker-dealer, member FINRA, SIPC. In his separate capacity as a registered representative, Mr. Frantzen will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Frantzen. Neither the Advisor nor Mr. Frantzen will earn ongoing investment advisory fees in connection with any services implemented in Mr. Frantzen's separate capacity as a registered representative.

Solomon Fund I GP, LLC

The Advisor is affiliated and under common control and ownership with Solomon Fund I GP, LLC ("Solomon Fund GP"). Solomon Fund GP serves as the General Partner to the Fund managed by the Advisor. The General Partner offers to third-party investors and Clients of WealthBuilders Investments (collectively "Investors") direct access to the Fund.

Due to the affiliation between the General Partner and WealthBuilders Investments, management persons have a financial incentive to recommend that Clients invest in the Fund. WealthBuilders Investments will charge a management fee on any assets invested into the Fund. To address this conflict, WealthBuilders Investments will not receive any investment advisory fees on assets invested by Clients into the fund.

Prior to recommending an investment into the Fund, WealthBuilders Investments will conduct appropriate due diligence to ensure the recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, WealthBuilders Investments will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation as it relates to the Fund. Finally, there is no requirement for WealthBuilders Investments to recommend the Fund to Clients, nor are Clients obligated to invest in the Funds.

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

A. Code of Ethics

WealthBuilders Investments has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with WealthBuilders Investments ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. WealthBuilders Investments and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of WealthBuilders Investments' Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (972) 719-2557.

B. Personal Trading with Material Interest

WealthBuilders Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. WealthBuilders Investments does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. WealthBuilders Investments does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

WealthBuilders Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by WealthBuilders Investments requiring reporting of personal securities trades by its

Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While WealthBuilders Investments allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will WealthBuilders Investments, or any Supervised Person of WealthBuilders Investments, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

WealthBuilders Investments does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize WealthBuilders Investments to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, WealthBuilders Investments does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where WealthBuilders Investments does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by WealthBuilders Investments. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. WealthBuilders Investments may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian’s offices.

WealthBuilders Investments will generally recommend that Clients establish their account[s] at either LPL Financial LLC (“LPL Financial”), or Charles Schwab & Co., Inc. (“Schwab”), a FINRA-registered broker-dealer and member SIPC. Schwab or LPL Financial will serve as the Client’s “qualified custodian”. Authentic maintains an institutional relationship with both Schwab and LPL Financial whereby the Advisor receives economic benefits from Schwab and LPL Financial. Please see Item 14 below.

Given Mr. Frantzen’s affiliation with Cabin Securities as a registered representative, the Advisor may be limited in using other broker-dealers/custodians as Cabin Securities must approve the use of any outside broker-dealer/custodian.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **WealthBuilders Investments does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

2. Brokerage Referrals - WealthBuilders Investments does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a “directed brokerage basis”, where WealthBuilders Investments will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). WealthBuilders Investments will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. WealthBuilders Investments will execute its transactions through the Custodian as authorized by the Client. WealthBuilders Investments may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Chad Frantzen, Chief Compliance Officer of WealthBuilders Investments. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify WealthBuilders Investments if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by WealthBuilders Investments

WealthBuilders Investments may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, WealthBuilders Investments may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform (Schwab)

WealthBuilders Investments has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like WealthBuilders Investments. As a registered investment advisor participating on the Schwab Advisor Services platform, WealthBuilders Investments receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services WealthBuilders Investments that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. WealthBuilders Investments believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platform (LPL Financial)

WealthBuilders Investments has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Compensation for Client Referrals

Certain Clients may be referred to the Advisor by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, the Advisor will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor, and shall not result in any additional charge to the Client.

Item 15 – Custody

All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct WealthBuilders Investments to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by WealthBuilders Investments to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Private Fund Management Services

As the Manager to the Fund, WealthBuilders Investments is deemed to have custody over the assets of the Fund. WealthBuilders Investments complies with Rule 206(4)-2(b) by having the Fund audited at least annually by a

PCAOB organized and inspected accountant, and distributing audited financial statements, which are prepared in accordance with generally accepted accounting principles, to limited partners within 120 days of the end of the fiscal year of the Fund.

Item 16 – Investment Discretion

WealthBuilders Investments generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by WealthBuilders Investments. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by WealthBuilders Investments will be in accordance with each Client's investment objectives and goals. When WealthBuilders Investments does not have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior approval from the Client. The Advisor will contact the Client and obtain approval prior to executing trades or allocating investment assets.

Item 17 – Voting Client Securities

WealthBuilders Investments does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither WealthBuilders Investments, nor its management, have any adverse financial situations that would reasonably impair the ability of WealthBuilders Investments to meet all obligations to its Clients. Neither WealthBuilders Investments, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. WealthBuilders Investments is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

Authentic Counsel, LLC

Form ADV Part 2A – Appendix 1 ("Wrap Fee Program Brochure")

Effective: March 28, 2024

This Form ADV2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for Authentic Counsel, LLC ("WealthBuilders Investments" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the Authentic Counsel, LLC Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete WealthBuilders Investments Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the WealthBuilders Investments Disclosure Brochure, please contact the Advisor at (972) 719-2557.

Authentic Counsel, LLC is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information about WealthBuilders Investments to assist you in determining whether to retain the Advisor.

Additional information about WealthBuilders Investments and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov by searching the Advisor's firm name or CRD# 173306.

Item 2 – Material Changes

Form ADV 2A - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses the Wrap Fee Program offered by the Advisor.

Material Changes

This is a brand new service offering. There are no material changes to disclose

Future Changes

From time to time, the Advisor may amend this Wrap Fee Program Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete WealthBuilders Investments Disclosure Brochure) or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of WealthBuilders Investments.

At any time, you may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for the Advisor's firm name or CRD# 173306. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (972) 719-2557.

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Item 4 – Services Fees and Compensation

A. Services

WealthBuilders Investments provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the WealthBuilders Investments Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting WealthBuilders Investments as your investment advisor.

As part of the investment advisory fees noted in Item 5 of the Disclosure Brochure, WealthBuilders Investments includes, in addition to securities transaction fees and administrative fees (herein “Covered Costs”) as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”. The Advisor’s recommended Custodian does not charge securities transaction fees for exchange-traded fund (“ETF”) and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. The Advisor sponsors the WealthBuilders Investments Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of Covered Costs into a single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the WealthBuilders Investments Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on WealthBuilders Investments’ investment philosophy and related services.**

B. Program Costs

Advisory services provided by WealthBuilders Investments are offered in a wrap fee structure whereby Covered Costs are included in the overall investment advisory fee paid to WealthBuilders Investments. As the level of activity in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the Covered Costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity or other Covered Costs. A Wrap Fee structure presents a conflict of interest as the Advisor is incentivized to limit the number of trades placed in the Client’s account[s] or to utilize securities that do not have transaction fees. As noted above, the Advisor’s recommended Custodian does not charge securities transaction fees for ETF and equity trades in Client accounts, but typically charges for mutual funds and other types of investments. As such, the Advisor is incentivized to utilize ETFs and other equity securities to limit the overall cost to the Advisor. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client’s best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

C. Fees

As noted above, the Wrap Fee Program includes Covered Costs incurred in connection with the discretionary investment management services provided by WealthBuilders Investments, as part of its overall investment advisory fee.

In addition, all fees paid to WealthBuilders Investments for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund’s prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Securities transaction fees for Client-directed trades will be charged back to the Client. In connection with the discretionary investment management services provided by WealthBuilders Investments, the Client will incur other costs assessed by the Custodian or other third parties, other than the Covered Costs noted above, such as administrative fees. The Advisor does not control nor share in these fees. The Client should review both the fees charged by the fund[s] and the fees charged by WealthBuilders Investments to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

D. Compensation

WealthBuilders Investments is the sponsor and portfolio manager of this Wrap Fee Program. WealthBuilders Investments receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Covered Costs associated with the management of the Client's account[s].

Item 5 – Account Requirements and Types of Clients

WealthBuilders Investments offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses, and charitable organizations. WealthBuilders Investments generally does not impose a minimum account size for establishing a relationship. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

Item 6 – Portfolio Manager Selection and Evaluation

Portfolio Manager Selection

WealthBuilders Investments serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

Related Persons

WealthBuilders Investments personnel serve as portfolio managers for this Wrap Fee Program.

Performance-Based Fees

WealthBuilders Investments does not charge performance-based fees for its investment advisory services. The fees charged by WealthBuilders Investments are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Supervised Persons

WealthBuilders Investments Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

Methods of Analysis

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. WealthBuilders Investments will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B. for risks associated with the Advisor's investment strategies as well as general risks of investing.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided

information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Alternative Investments (Limited Partnerships)

The performance of alternative investments (limited partnerships) can be volatile and may have limited liquidity. An investor could lose all or a portion of their investment. Such investments often have concentrated positions and investments that may carry higher risks. Gains and losses of alternative investments are passed through investors and if invested in Individual Retirement Accounts ("IRAs") these products may carry taxable income that investors should be informed about and prepared to bear. Client should only have a portion of their assets in these investments.

Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. For Example, equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

Oil and Gas Interests

Investing oil and gas interest whether directly or as part of a fund/ETF involves distinct risks. The price of oil and gas interests may fluctuate to a greater degree than other securities and contain additional risks based on the supply and demand for oil and gas. Some of these additional risks include, the ability to obtain reliable oil and gas supply, oil and gas reserve estimates, the ability to locate markets for oil and gas, fluctuations in prices. The values of oil and gas interests are subject to market risk by a range of variables that could cause trends to differ materially.

Digital Assets Risks

Digital assets are highly speculative and volatile investments that may become illiquid at any time. Digital assets are loosely regulated. A Client could lose the entire value of their investment in digital assets and is only suitable for Clients with a high risk tolerance. The Advisor only uses Digital Assets through Independent Managers.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.

Proxy Voting

WealthBuilders Investments does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 7 – Client Information Provided to Portfolio Managers

WealthBuilders Investments is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the WealthBuilders Investments Privacy Policy (included after this Wrap Fee Program Brochure).

Item 8 – Client Contact with Portfolio Managers

WealthBuilders Investments is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at WealthBuilders Investments.

Item 9 – Additional Information

A. Disciplinary Information and Other Financial Industry Activities and Affiliations

There are no legal, regulatory or disciplinary events involving WealthBuilders Investments or its owners.

WealthBuilders Investments values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor or Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 173306.

Please see Item 9 of the WealthBuilders Investments Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

Other Financial Activities and Affiliations

Please see Item 10 – Other Financial Activities and Affiliation and Item 14 – Client Referrals and Other Compensation of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure).

B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

WealthBuilders Investments has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to WealthBuilders Investments' compliance program (our "Supervised Persons"). Complete details on the WealthBuilders Investments Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

Review of Accounts

Client accounts are monitored on a regular and continuous basis by Advisory Persons of WealthBuilders Investments under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

Other Compensation

Participation in Institutional Advisor Platform (Schwab)

WealthBuilders Investments has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like WealthBuilders Investments. As a registered investment advisor participating on the Schwab Advisor Services platform,

WealthBuilders Investments receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services WealthBuilders Investments that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. WealthBuilders Investments believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platform (LPL Financial)

WealthBuilders Investments has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on additional compensation that may be received by WealthBuilders Investments or its Advisory Persons. Each Advisory Person's Brochure Supplement (also included with this Wrap Fee Program Brochure) provides details on any outside business activities and the associated compensation.

Compensation for Client Referrals

Certain Clients may be referred to the Advisor by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, the Advisor will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by the Advisor, and shall not result in any additional charge to the Client.

Financial Information

Neither WealthBuilders Investments, nor its management, have any adverse financial situations that would reasonably impair the ability of WealthBuilders Investments to meet all obligations to its Clients. Neither

WealthBuilders Investments, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. WealthBuilders Investments is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

Form ADV Part 2B – Brochure Supplement

for

**Chad R. Frantzen
Founder and Chief Compliance Officer**

Effective: March 28, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Chad R. Frantzen (CRD# 4210741) in addition to the information contained in the Authentic Counsel, LLC (“WealthBuilders Investments” or the “Advisor”, CRD# 173306) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the WealthBuilders Investments Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (972) 719-2557.

Additional information about Mr. Frantzen is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4210741.

Item 2 – Educational Background and Business Experience

Chad R. Frantzen, born in 1977, is dedicated to advising Clients of WealthBuilders Investments as the Founder and Chief Compliance Officer. Mr. Frantzen earned a Masters of Divinity from Global Awakening Theological Seminary in 2019. Mr. Frantzen also earned a B.S. Business Management from Texas A&M University in 2000. Additional information regarding Mr. Frantzen's employment history is included below.

Employment History:

Founder and Chief Compliance Officer, Authentic Counsel, LLC	11/2014 to Present
Registered Representative, Cabin Securities, Inc.	11/2021 to Present
Registered Representative, Center Street Securities, Inc.	08/2021 to 11/2021
Registered Representative, Great Point Capital, LLC	02/2021 to 08/2021
Registered Representative, Mutual Securities Inc	02/2105 to 02/2021
Financial Advisor, LPL Financial	08/2008 to 01/2015

Certified Financial Planner™ (“CFP®”)

The Certified Financial Planner™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner™ Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP®

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Frantzen. Mr. Frantzen has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Frantzen.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Frantzen.***

However, we do encourage you to independently view the background of Mr. Frantzen on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4210741.

Item 4 – Other Business Activities

Broker-Dealer Affiliation

Mr. Frantzen is also a registered representative of Cabin Securities, Inc. ("Cabin Securities"). Cabin Securities is a registered broker-dealer (CRD# 26898), member FINRA, SIPC. In Mr. Frantzen's separate capacity as a registered representative, Mr. Frantzen will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Frantzen. Neither the Advisor nor Mr. Frantzen will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Frantzen's separate capacity as a registered representative. Mr. Frantzen spends approximately 10% of his time per month in his role as a registered representative of Cabin Securities.

Insurance Agency Affiliations

Mr. Frantzen is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Frantzen's role with WealthBuilders Investments. As an insurance professional, Mr. Frantzen will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Frantzen is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Frantzen or the Advisor. Mr. Frantzen spends approximately 5% of his time per month in this capacity.

Solomon Fund I GP, LLC

Mr. Frantzen serves as the managing member to Solomon Fund I GP, LLC ("Solomon Fund I GP"), an affiliated entity with the Advisor through common control and ownership. Solomon Fund I GP serves as the general partner (the "General Partner") to a pooled investment vehicle ("Fund"). The General Partner offers investors with access to the private equity fund, including Clients of WealthBuilders Investments. Investors in the Fund are subject to management fees to WealthBuilders Investments. Additionally, Investors are charged a carried interest which is paid to the General Partner. Carried interest allocations are typically deducted from investment proceeds that would otherwise be distributable to the investors in the Fund. The manner of calculation and application of the management fee and the carried interest allocations are disclosed in the offering documents for the Fund.

Due to the affiliation between the General Partner and the Advisor and the receipt of a management fee and carried interest, Mr. Frantzen has a financial incentive to recommend that Clients invest into the Fund. Prior to recommending an investment into a Fund, the Advisor will conduct appropriate due diligence to ensure the recommendation to a Client to invest aligns with the Client's investment needs and objectives. In addition, the Advisor will provide additional disclosure information to each Client, which will include relevant details regarding material financial interests and compensation as it relates to the Private Fund. Finally, there is no requirement for the Advisor to recommend this product to Clients, nor are Clients obligated to invest into the Fund.

Item 5 – Additional Compensation

Mr. Frantzen has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Frantzen serves as the Founder and Chief Compliance Officer of WealthBuilders Investments. Mr. Frantzen can be reached at (972) 719-2557.

WealthBuilders Investments has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of WealthBuilders Investments. Further, WealthBuilders Investments is subject to regulatory oversight by various agencies. These agencies require registration by WealthBuilders Investments and its Supervised Persons. As a registered entity, WealthBuilders Investments is subject to examinations by regulators, which may be announced or unannounced. WealthBuilders Investments is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Jose Salcedo Jr.
Portfolio Manager**

Effective: March 28, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jose Salcedo Jr. (CRD# 2413388) in addition to the information contained in the Authentic Counsel, LLC (“WealthBuilders Investments” or the “Advisor”, CRD# 173306) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the WealthBuilders Investments Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (972) 719-2557.

Additional information about Mr. Salcedo is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2413388.

Item 2 – Educational Background and Business Experience

Jose Salcedo Jr, born in 1968, is dedicated to advising Clients of WealthBuilders Investments as Portfolio Manager. Mr. Salcedo earned Bachelor's degree in Sociology from the University of California, Santa Barbara Seminary in 1993. Additional information regarding Mr. Salcedo's employment history is included below.

Employment History:

Portfolio Manager, Authentic Counsel, LLC	07/2019 to Present
Managing Member and Chief Compliance Officer, Cathedral Wealth Management	02/2019 to 02/2019
Managing Member and Chief compliance Officer, Biltmore Wealth Management	10/2017 to 09/2019
Portfolio Manager, JS Strategic Advisors	01/2012 to 10/2017

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Salcedo. Mr. Salcedo has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Salcedo.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Salcedo.***

However, we do encourage you to independently view the background of Mr. Salcedo on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2413388.

Item 4 – Other Business Activities

Mr. Salcedo is dedicated to the investment advisory activities of WealthBuilders Investments' Clients. Mr. Salcedo does not have any other business activities.

Item 5 – Additional Compensation

Mr. Salcedo is dedicated to the investment advisory activities of WealthBuilders Investments' Clients. Mr. Salcedo does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Salcedo serves as a Portfolio Manager of WealthBuilders Investments and is supervised by Chad Frantzen, the Chief Compliance Officer. Mr. Frantzen can be reached at (972) 719-2557.

WealthBuilders Investments has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of WealthBuilders Investments. Further, WealthBuilders Investments is subject to regulatory oversight by various agencies. These agencies require registration by WealthBuilders Investments and its Supervised Persons. As a registered entity, WealthBuilders Investments is subject to examinations by regulators, which may be announced or unannounced. WealthBuilders Investments is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Otis C. Barnard
Investment Advisor Representative**

Effective: March 28, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Otis C. Barnard (CRD# 7340096) in addition to the information contained in the Authentic Counsel, LLC (“WealthBuilders Investments” or the “Advisor”, CRD# 173306) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the WealthBuilders Investments Disclosure Brochure or this Brochure Supplement, please contact us at (972) 719-2557.

Additional information about Mr. Barnard is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7340096.

Item 2 – Educational Background and Business Experience

Otis C. Barnard, born in 1992, is dedicated to advising Clients of WealthBuilders Investments as an Investment Advisor Representative. Mr. Barnard earned a B.S. in Accounting; BBA from Colorado Christian University in 2014. Mr. Barnard also earned a BBA in Business in Administration from Colorado Christian University. Additional information regarding Mr. Barnard's employment history is included below.

Employment History:

Investment Advisor Representative, Authentic Counsel, LLC	03/2021 to Present
Financial Analyst, Andrew Wommack Ministries	02/2020 to 02/2021
Financial Manager, BAI Management	12/2016 to 10/2019
Assistant Controller, Scott Brown Properties	08/2014 to 11/2016

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Barnard. Mr. Barnard has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Barnard.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Barnard.***

However, we do encourage you to independently view the background of Mr. Barnard on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 7340096.

Item 4 – Other Business Activities

Non-Profit Entity Affiliation

Mr. Barnard works for WealthBuilders, a 501c3 non profit organization based in Denver, Colorado.

Item 5 – Additional Compensation

Mr. Barnard has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Barnard serves as an Investment Advisor Representative of WealthBuilders Investments and is supervised by Chad Frantzen, the Chief Compliance Officer. Mr. Frantzen can be reached at (972) 719-2557.

WealthBuilders Investments has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of WealthBuilders Investments. Further, WealthBuilders Investments is subject to regulatory oversight by various agencies. These agencies require registration by WealthBuilders Investments and its Supervised Persons. As a registered entity, WealthBuilders Investments is subject to examinations by regulators, which may be announced or unannounced. WealthBuilders Investments is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: March 28, 2024

Our Commitment to You

Authentic Counsel, LLC ("WealthBuilders Investments" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy"). The Advisor conducts business under WealthBuilders Investments.

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. WealthBuilders Investments (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

WealthBuilders Investments does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

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

Why you need to know?

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

What information do we collect from you?

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

What Information do we collect from other sources?

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

How do we protect your information?

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

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

How do we share your information?

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

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. WealthBuilders Investments shares Client information with Cabin Securities, Inc. This sharing is due to the oversight Cabin Securities has over Chad Frantzen as a Supervised Persons of the Advisor. You may also contact us at any time for a copy of the Cabin Securities Privacy Policy.	Yes	No
Marketing Purposes WealthBuilders Investments does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where WealthBuilders Investments or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients WealthBuilders Investments does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

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

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting the Advisor at (972) 719-2557.