



## Firm Brochure

March 31, 2024

This Brochure provides information about the qualifications and business practices of TRADEway. If you have any questions about the contents of this Brochure, please contact us at (877) 777-0703. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

TRADEway is a Registered Investment Adviser.

**DISCLAIMER:** The information in this brochure has neither been approved nor verified by the United States Securities and Exchange Commission, nor by any state securities authority. TRADEway's description of itself in this brochure, as a Registered Investment Advisor, does not imply a certain level of skill or training on the part of TRADEway or its representatives. Additional information about TRADEway is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### **Item 2: Material Changes**

Our Brochure may be requested by contacting us at:

2028 E. Ben White Blvd #240-7073; Austin, TX 78741.

By phone at (877) 777-0703, or *via* email at [compliance@tradeway.com](mailto:compliance@tradeway.com)

Our physical address is: 158 Private Road 5489; Mexia, TX 76667

### **Section A.**

#### **THE COMPANY**

Designer Technologies, Inc., which does business as TRADEway, was organized in 1999 as a Texas corporation under the laws of the State of Texas. Its principal owners and founders are David and Charlotte Mitchell. The company began its evolution to the current business model in 2006, and established the name TRADEway in 2016.

TRADEway's mission statement is: "To break down the confusing world of finance so that our students can understand it. We glorify God through family, money, and business." The mission of TRADEway is to build a better America for our grandchildren and future generations. We believe the first step on this path is to reinvigorate the American entrepreneurial spirit and return to the foundational principles that first made this country great. For additional information please visit: <https://www.tradeway.com/disclosures>.

The TRADEway team recognizes the valuable human factor in business from both a tactical and strategic level. Our company is premised on the idea that enduring cultural change must start with individuals. We work toward our mission by teaching business principles from the Bible, reviving the entrepreneurial spirit in America, and empowering individuals to take control of their finances. TRADEway believes in the

strength of the family-centered business providing education to individuals who want to learn how to invest and trade in the stock market. In this way, TRADEway believes that each generation can teach the next methods which can provide a competitive edge.

TRADEway offers a variety of advisory services including: live/virtual events; online education/courses; weekly online webinars; phone/email coaching; frequent email alerts; and web based tools.

## **OWNERSHIP**

TRADEway is headquartered in Mexia, Texas (approximately 2 hours south of Dallas, TX). TRADEway was founded by David and Charlotte Mitchell, who each retain a 50% ownership of the company. Mr. Mitchell is a fourth generation oil man and entrepreneur who received his BA degree in Business in 1976, and an MBA degree in 1978, from Baylor University. Mr. Mitchell and his family earned their initial success in oil. Investing was a central principle taught to him from an early age.

David has spoken to many audiences on the topic of the entrepreneurial spirit and the importance of the family business. He has presented cash flow investing events across the country. He is also the host of the popular Word on Investing podcast and TRADEway's YouTube Channel which releases new content weekly.

David has been in the ministry for over 40 years. His experience includes youth ministry, serving as Associate Pastor under three different pastors, and he has been the Sr. Pastor of Park Meadows Church in Corsicana, Texas, now for over 25 years. His gift of teaching comes out in his ministry as well as in his business endeavors.

Mrs. Charlotte Mitchell, 50% co-owner of TRADEway, earned a BBA degree in Marketing from Baylor University in 1978. Since 1995, Charlotte has served as Vice President of both Mitchell & Associates, Inc., and E. G. Hall Oil Company, Inc. Charlotte was under contract as a Certified National Trainer for a large publicly traded marketing company for four years, and has conducted instructional marketing seminars. She is a valuable source of information in product design and determining marketing strategies for TRADEway.

## **Section B.**

### **TYPES OF ADVISORY SERVICES**

TRADEway provides investment advice and education to individuals on how to invest and trade in the U.S. Stock Market. TRADEway events and online education/support cover a spectrum of trading styles and asset classes. The education normally begins with attending a two-day educational event (live or virtual) concerning stocks, or a condensed on-demand version of the course. Should the student wish to advance in the program, further live/virtual events and educational products/support can be purchased. TRADEway is different in that it does not maintain custody of any client assets, but rather we teach students how to take control of their own investments and make educated investment decisions with our support and guidance.

## Live & Virtual Education Events:

Name	Description
Live & Virtual Education Events:	
Step 1: Start Your Journey	This course teaches basic terminology and economic principles and how these principles may affect the price of a stock on the U.S. stock market. Students learn what types of investments might be better than others, how to determine for themselves if it is a good time to move on a stock and the reasoning behind such moves. Fundamental company analysis is discussed. ROI calculations are demonstrated and students are introduced to rolling stocks. Students are taught how to recognize patterns; draw trend lines; determine proper buy/sell points; learn stock market jargon; and more.
Step 2: Know Your Options	Students are introduced to purchasing put and call options. Types of Options are examined, as well as an examination of the use of leverage. Option strategies, coupled with specific rules, are discussed so that the student feels comfortable with their new skill-set.
Step 3: Run with Confidence	This course discusses strategic diversification and seeks to give students an understanding of the pitfalls of overextending. Company fundamentals are focused on again, with an introduction to ratios, review of balance sheets and income statements and guides on where to find additional research. Credit Spread strategies are discussed in detail and rules are provided so that the new investor feels confident before moving forward.
Step 4: Reach Your Destination	This course goes more in-depth on the study of spreads, including how to write covered calls. As with our other events, these new strategies are coupled with additional rules which may help students become more knowledgeable traders.

<b>Specialized Educational Programs:</b>	
Master Trader	Lifetime access to 3 Workshops; Steps 1-4; On-demand educational courses and workbooks; and 12 months access to TraderPRO which includes Charts by TRADEway.
Elite Trader	Lifetime access to Steps 1-4; On-demand educational courses and workbooks; and 9 months access to TraderPRO which includes Charts by TRADEway.
Classic Trader	Lifetime access to Steps 1-2; On-demand educational courses and workbooks; and 6 months access to TraderMAX which includes Charts by TRADEway.
Basic Trader	Lifetime access to Step 1; On-demand educational courses and workbooks; and 3 months access to TraderMAX which includes Charts by TRADEway.
Precision Step: Plan Your Path	Our team will provide students with personalized 5-year, month by-month business plans tailored specifically for their current financial situation and risk tolerance. They will also learn how to sharpen their trading skills, and will learn new trading strategies, along with Biblical business principles which help them become better stewards of their money.
Precision Step: News Moves	Our team teaches how to do news plays the right way, plus speculative strategies for the goal of creating cash flow.
Precision Step: Putting on a Play	Our team teaches this long-term buy-and-hold strategy which incorporates trailing stop losses, profit-taking stops, and pyramids. This course also includes oil field strategies that exemplify proper money management.
Precision Step: Power Spreads	This is one of David Mitchell's favorite methods. Three events must come together to create this trading opportunity. They happen frequently, and our team teaches how to find them and take advantage of the opportunities.

Precision Step: Texas Sharpshooter	Our students learn to find and take advantage of market manipulation. This is a strategy that can be used in some market scenarios.
Precision Step: Texas Outlaw	Our students learn to identify the premise of a trade, understand market symmetry, and choose the correct option using market maker expected moves.
Stock Flippers	Our students learn to set up an options trade with a high probability to “flip” their stock for profit, all while reducing the risk and applying trading mechanics.
Power Trend	We have identified specific criteria that identify the “Power Trend” pattern setup, so it makes finding trades based on the criteria easier to find. Building a rule set for the trade setup is simple and incorporates a brand new indicator we’ve never taught before! “Power Trend” creates a setup to help you not only identify a trade but create an emotionless “trigger” for entering the trade and knowing when to exit
<b>Additional Programs, Memberships and Tools</b>	
Coaching	TraderPRO members have access to investment advisor representatives for review of client-created investment strategies, discussion of current investment opportunities, and speculation on how news could affect various investments. Coaching is done through approved TRADEway communication channels, such as phone, email, and online community pages.
Weekly Webinars	We have a variety of weekly webinars available to match our client’s trading level. Whether they are a Step 1 grad looking for guidance with their newly acquired skill set, or an advanced event grad in search of a better way to trade, we provide weekly webinars that fits their needs. They can ask questions, discuss stocks, and fine-tune their trading, as well as have ongoing analysis throughout the week.
INSIDER+	This membership includes the following: “Step 1: Start Your Journey” and “Safety Step: Protect Your Future” online courses; weekly online Market Watch webinar; INSIDER+ TRADEway online Community page; weekly Stock Talk Webinar; daily market alert emails; Basic Charts by TRADEway license (watchlists/charting/research/scans/trading journal). Membership may be canceled at any time by calling or emailing.

TraderMAX	This membership includes: All INSIDER+ benefits as listed above and the following: Market Corner 2, Weekly Stock & Options Watch Webinars; TraderMAX online community; Elite Charts by TRADEway license (watchlists/charting/research/premium scans/trade staging/trading journal). Membership may be canceled at any time by calling or emailing.
TraderPRO	The most comprehensive membership, TraderPRO includes all of the benefits of the INSIDER+ and TraderMAX Memberships, as well as access to the Spread Watch Webinar, Market Corners 3 and 4, access to coaches via email/phone, Active Trader Community Page; Live Trading hour 4 days per week during trading hours; Elite Charts byTRADEway license (watchlists /charting/ research/premium scans/trade staging/trading journal). Membership may be canceled at any time by calling or emailing.
High Leverage Zone	This is a combo package which includes Putting On A Play, Stock Flippers (with a bonus of 6 months access to the Stock Flippers Community Page) and 6 months access to the TraderMAX subscription
Interactive Home Study Courses	These courses go in-depth on specific strategies in order to enhance learning from home. We have courses covering the following: Rolling Stocks, Options, Trending Stocks, Candlesticks, Bases, Stock Splits, and Indicators. Additional courses available are The Hidden Edge, The Double Edge, Simply Price, Cutting Out the Noise, Stock Flippers, Bottoms Up, Flex Options, Bear to Blessing, Mind Mold Trading, The Trader's Toolbox, Wealth is a God Idea, Take Advantage of Your Advantage, Options Flippers, and the TRADEway Journal Series.
Top Gun Elite Subscription	This advanced program is for experienced traders who trade full time using the TRADEway system, or who have been trading for one full year and have completed Steps 1-4. The program includes: TGE community page which has helpful articles, tips, and ongoing communication with members; monthly TGE webinar; personal goal setting and accountability; stock trading analysis. This membership may be canceled at any time by emailing or calling

Workshops	This is a 3-part series available to students who have completed Steps 1-4 and are ready for the next step in their trading. These are included in certain bundle packages as well (such as Master Trader). Find Your Stride, Run Your Race, and Master Your Journey are designed to help give greater knowledge and understanding of trade setups, help develop a solid trading plan that fits their style of trading, and instill greater levels of confidence in trading.
Workshop Pro Subscription	This is a support program for people who have purchased access to Workshops 1-3. Workshop Pro provides access to a designated online community page, monthly webinars, frequent email alerts, and practice assignments that are meant to strengthen what students have learned from the Workshop courses. This membership may be canceled anytime by calling or emailing.
Precision Pro Subscription	This is a support program for people who have purchased one or more of the Precision Step strategies. The program provides access to a designated online community page for each of the Precision Steps, monthly webinars, frequent email alerts, and practice assignments that are meant to strengthen what students have learned from the Precision Step classes. These memberships may be canceled at any time by emailing or calling.
Precious Metals	This educational program consists of an online course, "Safety Step Protect Your Future". After viewing the course, students can sign up for Prospector, a monthly support service.

Prospector Subscription	This is a monthly subscription that provides ongoing learning opportunities for those who are interested in precious metals investing. It includes email alerts with market and price information, and tutorials. This membership may be canceled at any time by calling or emailing.
Market Corners	The market corners are weekly online classes offered for Steps 2-4. Hosts dive deep into the specific concepts taught at Steps 2-4, answer questions, and make sure there is clear understanding from the students prior to moving forward. This allows us to spend more time covering the concepts and developing the students. Students who are in various memberships such as TraderMAX or TraderPRO have access to Market Corners.
TRADEway Community	This is an online community page, similar to a blog. Clients can interact with other students, and our team. We post thoughtful questions, tips, articles, and much more. The goal is for the clients to consider the topics we post and discuss them together, as well as get their questions answered. We have community pages for most of our programs such as Top Gun Elite, Workshops, Precision Steps, Precious Metals, Steps 2-4 and many others. This is a key way we connect with our students on a daily basis.
Topical Workshops	We offer a free monthly workshop to our students teaching various trading topics of interest. These are all available on our YouTube channel as well.



Learning Labs	These are supplemental classes meant to build on NewsMoves and/or Power Spreads. They may be purchased as “add-ons” for the classes. The Learning Labs give our clients an opportunity to dig into the concepts, ask questions, see examples of the strategies in action, and hear additional tips on how to effectively use the strategies.
The Word on Investing Summit	Once a year we bring together many of our TRADEway speakers, as well as guest speakers, to deliver 2 days of high-value content on the topics of money, mindset, wealth building, stock trading, and more. We cover a variety of topics that help our students refocus, re-engage, and rediscover ways to reach their goals.
Charts by TRADEway	We offer a Basic and Elite plan for this charting/trading platform. Students may access watchlists/scans/screeners/trade journaling, and more. A Charts by TRADEway license is included in our memberships, or offered a la carte. Cancel at any time.
Mentorship Programs	We offer three 1-on-1 Mentorship Programs whereby a Mentee is assigned to a Mentor over a period of time and given an allocated number of mentorship sessions. The sessions are conducted via Zoom for 1 hour sessions. The Mentor will dig deep into where a client currently is in their trading journey, and help them get to where they need to be by holding them accountable, giving them “homework” to complete to improve their trading habits, review trades, and find potential trade set-ups.

<p>TRADEway AMPT Portfolios</p>	<p><b>TRADEway AMPT Portfolios:</b></p> <p>This is an asset management assistance program. AMPT stands for Assisted Client-Managed Portfolios by TRADEway.</p> <p><b>AMPT-PRO Portfolio:</b></p> <p>Rather than taking your money and investing for you, you maintain control of your money. You "push the buttons" while our TRADEway Investment Advisor Reps assist you all along the way. This is an asset management assistance program with a recommended \$25,000 minimum. TRADEway does not take custody of client funds. Here are the basic steps:</p> <p>First, Clients PREPARE. They take part in our educational component of AMPT to gain a proper understanding of Long-Term buy and hold investing skill sets. It includes how to understand proper diversification and systematic risk management, the two most important aspects of wealth management. The lesson also discusses the difference in skill sets needed for long term investing versus short term trading, as well as the contrasting purposes of the two, and why both are important. The skills session will be taught via webinar.</p> <p>Second, Clients choose a MODEL. We have established four model portfolios. Clients choose one, with our help, based upon their risk tolerance, age, and financial goals. They all have diversified weighted sector-based allocations to help scale risk. We work with clients collaboratively to help them choose their risk tolerance from our models.</p> <p>Next, Clients can CUSTOMIZE. Through our vendor/partner tools, clients have the ability to customize his or her portfolio.</p> <p>Fourth, Clients ADJUST. Periodic adjustments are suggested for each portfolio based primarily upon the stage in the lifecycle of a bull market (or bear market) we are in, current market tone and world events. These suggestions for adjustments are provided through AMPT Assist for TRADEway AMPT clients. This includes information specifically concerning long-term investments, and how market conditions and news world-wide can cause a need for rebalancing one's portfolio. This information is provided via AMPT Assist emails.</p> <p>Fifth, Clients potentially SAVE MONEY.</p> <p>There are a few one-time set up fees:  Setup fees: (fee based on \$ assets under management, may be discounted) \$497</p> <p>Optional online education Simple Plan&lt; \$200,000): \$250</p> <p>\$200,000 to \$350,000: \$450  \$350,001 to \$700,000: \$1,299  If client has \$700,001 +: \$2,999</p>
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## **Section C.**

### **TAILORING OUR ADVISORY SERVICES TO CLIENTS**

The TRADEway experience provides the knowledge to help create your family legacy. The system includes a wide array of online educational courses and support. A number of them are offered through live virtual classes throughout the year and include ongoing support.

Our educational courses range from beginner (with zero trading experience) to advanced trading techniques. They also include tools such as our tradeway.com website, our Charts by TRADEway trading/charting platform, and various memberships (INSIDER+; TraderMAX; TraderPRO). We host weekly Watch Webinars and Market Corners allowing students from all over the U.S. to join us in choosing stocks, having questions answered and learning from our TRADEway Coaches.

The services TRADEway offers are conducted by a staff of professional speakers, consultants, and coaches who are Investment Advisor Representatives and supporting administrators. We offer one-on-one help by phone, email, and online community pages. Students will always be connected with a friendly, knowledgeable, professional team member who can help tailor trading strategies to match their personal financial goals. With education offered from instructors during live virtual events, from the comfort of a student's home, we have programs that fit a variety of learning styles.

### **Occasional or Rare Private Placements**

TRADEway may, on occasion, identify potential private investment opportunities. These opportunities may carry an inherent conflict of interest for TRADEway personnel and require additional disclosure and consent from TRADEway clients (see Item 10). The CCO is responsible for overseeing the analysis of the investments by meeting with investment professionals, including owners, brokers, and managers of the proposed investment.

The CCO will use several steps in his/her screening process when evaluating a potential investment, which may include, but are not limited to, the steps listed below:

- An initial comparison of investment-specific information (*e.g.*, returns, historical returns, risk involved) to competitive investments benchmarked against other information available to TRADEway;

- The past performance of a potential investment is evaluated through the review and analysis of the cash flows and operating statements of actual results for prior years. TRADEway should review the operating history of all potential investments as a critical part of its acquisition analysis;
- Forecasting of future operations and cash flows;
- Valuation of the investment through an appropriate method;
- Comprehensive due diligence of legal, economic, and market conditions.

The research and due diligence information collected will be memorialized or summarized in an investment memorandum that is presented to (an independent advisory firm) for review. Final approval will be given or denied by TRADEway's CCO.

## **Section D.**

### **WRAP FEE PROGRAMS**

TRADEway does not participate in wrap fee programs.

## **Section E.**

### **ASSETS UNDER MANAGEMENT**

As of the date of this brochure, TRADEway does not have custody of clients funds. TRADEway does have discretionary trading authority over certain assets in the AMPT AIM, SEED, and UP portfolios. Discretionary authority is granted by the client to TRADEway.

## **Item 5: Fees and Compensation**

### **Section A. Overview of Compensation Plan**

TRADEway's intention is to provide a simple pay structure for clients to be able to select the education that best fits their needs. Several of our services are subscription-based, and can be canceled at any time. Others are offered for a flat fee.

Clients pay fees in the following manner:

- **Live Events** (Steps 1-4 and Workshops 1-3), **Online Courses, and Specialized Educational Programs:** Students are charged a flat fee which varies based on the types of educational package our students select. TRADEway may choose to negotiate this and any other fee mentioned herein. Negotiation is based largely on our relationship with the student, whether they have purchased products previously and their financial status. À la carte products are available, as well as special combination pricing. We also may offer discounts on some products from time to time.
- **Coaching:** Coaching is provided as a benefit for clients who decide to pursue some of our educational programs or memberships. For example, a client who decides to move forward with Master Trader will receive 12 months of access to our Coaches. After the 12 months of included service expires, clients, if they choose, may purchase additional coaching access through one of our memberships and cancel at any time (pay monthly).
- **Watch Webinars:** We offer a variety of weekly Watch Webinars to fit the skill level of our clients. These are all included as a benefit of our memberships which are charged by the month, and students may cancel anytime.

- **Insider+, TraderMAX and TraderPRO Services:** These services are provided for a monthly fee which may be canceled at any time by the client.
- **Interactive On-Demand Courses:** On-Demand courses are offered for a flat fee and range in price depending on the course selected.
- **Top Gun Elite Program:** This service is offered at a monthly fee and to serious/committed traders only, and there are certain fundamental qualifications that must be met in order to be enrolled in this program. The subscription may be canceled at any time by the client.
- **WorkshopPro, Precision Pro, and Prospector:** These support programs are subscription-based services offered at monthly fees which the client may cancel at any time. Members of the programs must be eligible to participate. Example: to be a member of Workshop Pro, a client must have already purchased access to Workshops 1- 3.
- **Learning Labs:** These live classes are offered for a flat fee. If both learning labs are purchased at the same time, we offer a combo discount.
- **Precious Metals Online Course:** This online course is offered for a flat fee to anyone interested in pursuing education related to precious metals investing.
- **Market Corner & TRADEway Community:** These are benefits included in our memberships. Memberships may be canceled anytime.
- **Mentorship Programs:** These are offered for a flat fee.
- **Trade in 30 Day Challenge:** This is offered for a flat fee.
- **16 Day Trading Habit Challenge:** This is offered for a flat fee.
- **Jumpstart Trading Challenge:** This is offered for a flat fee.

## Section B.

How fees are paid:

Students attending events are charged a one-time fee in advance of each event, or package of events, that they elect to take through TRADEway. The client may elect to pay in full up front, or pursue funding options through a third-party provider. Clients who elect to pay their entire amount up front may receive a discount. TRADEway will consider a number of factors when giving discounts, including but not limited to whether the student has purchased other products, if they are purchasing up front, and the student's financial standing. All monthly subscription based services are billed in advance, but may be canceled at any time by calling or emailing. Please refer to Section A for a description of each product/service offered.

TRADEway charges a one-time fee for our educational products and services. Therefore, clients can purchase information one time, and have the knowledge for the rest of their lives and for future generations within their family! For our live events and bundles, one "tuition" is good for the household (both spouses, children 25 years of age and younger, and elderly living in the same household ages 60+). The fees that we charge are comparable to other financial educational systems, and yet affordable to most clients due to funding options with our third-party provider. However, please note that clients who elect to pay the entire cost up front may receive a discount based on this and a number of factors, including whether they purchased other TRADEway products, or are an employee, and the student's financial standing. We accept all major credit cards, as well as checks, ACH, or cash, for methods of payment. Students may incur other fees when engaging other service providers to implement the training they receive through TRADEway, such as brokerage, administrative, loan fees, or custodial fees. TRADEway does not select these service providers on behalf of any student and does not negotiate fees.

## **Section C.**

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

Students may incur other fees when engaging other service providers to implement the training they receive through TRADEway, such as brokerage, administrative or custodial fees. TRADEway does not select these service providers on behalf of any student.

## **Section D.**

Students must pay for the Live Events and Specialized Educational Programs in advance.

For all of our flat rate products as described above, we offer a 3-business day window in which the client may cancel their purchase without penalty; for our on-going monthly subscription a monthly payment is collected, however clients may cancel at any time with a simple phone call or email. In addition, our foundational Step 1 event provides a full money back guarantee--if someone attends the 2-day event and decides it is not for them, they may turn in their workbook and receive a full refund on their ticket purchase (they have 30 days to do this).

## **Section E.**

Neither TRADEway nor its officers or employees receive compensation for the sale of securities. We pay our team a sales commission on products/services that are sold at live events, or remotely *via* phone/email. While TRADEway's method of teaching students is proprietary, other institutions also teach fundamentals of investing, and students always have a choice. TRADEway does not offset fees against each other.

### **Item 6: Performance-Based Fees and Side-by-Side Management**

TRADEway does not take performance based fees.

### **Item 7: Types of Clients**

TRADEway endeavors to provide investment advice to individuals who will utilize the information to trade privately with the intention to generate a degree of personal income. These individuals come from all walks of life, all levels of income, all classes of society, and a variety of experience levels of trading.

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

#### **Section A.**

#### **Methods of Analysis and Investment Strategies:**

TRADEway will assist its clients in selecting stocks by providing them with live events, weekly webinars and other educational opportunities to assist with selecting stocks that may meet a client's investment needs. It is the sole discretion of the client to elect which stock to purchase.

TRADEway provides educational opportunities which teach its clients how to properly select stocks, and make their own informed investment decisions. We do this through a series of live events, weekly webinars, on-demand courses, coaching, market corners, and web tools. The TRADEway education is based on David Mitchell's proprietary "3-legged table" trading system. The 3 legs of the trading table consist of: fundamental analysis (corporate financial analysis); technical analysis (price and volume trends in stocks and indices); and market tone (news and world events). When these three things come together, trading becomes much more reliable, whereas when one leg is missing, the



trading becomes sporadic and unpredictable. TRADEway teaches its clients how to do their own analysis, but assists them in this process through coaching, our membership programs, and other methods listed above. At our live/virtual events, we teach strategies for short-term trading and long-term investing which include topics covering: rolling stocks, trending stocks, rolling options, trending options, debit spreads, credit spreads, call writing, and speculative plays which have to do with combining methods of trading along with market conditions.

## **Section B.**

### **Risks Involved With Our Methods of Analysis:**

There are certain risks associated with being a TRADEway client, including but not limited to:

**Risk of Loss:** Investing in securities involves risk of the complete loss of the investments that clients must be prepared to bear. All investments carry the risk of loss and there is no guarantee that any investment strategy will succeed. The advice received from any TRADEway staff or personnel does not alter in any way the client's sole responsibility for selecting which stock they will purchase.

As with any entity that stores data, especially financial data, TRADEway faces cybersecurity risks. While it may take steps for protecting the data in its trust, the threat is ever-evolving and an unauthorized party may gain access to customer data or proprietary information, or cause such a party to suffer data loss, corruption or lose operational functionality. We take precautions and have systems in place to keep our client's information secure, while realizing that this risk is inevitable.

### **Item 9: Disciplinary Information**

While TRADEway has no disciplinary actions to disclose, the company did participate in an SEC inquiry. During our discussions with the SEC, TRADEway discussed plans to register as an investment adviser which it completed in 2016 with no further action taken on the part of the SEC.

## **Section A.**

Broker Dealer

Not applicable.

## **Section B.**

Commodity Pool Operator and Commodity Trading Adviser

Not applicable.

## **Section C.**

Other Relationships and/or Arrangements Material to Advisory

Business:

### **Tastyworks Brokerage Accounts:**

TRADEway receives compensation for sending customers to tastyworks. The Mitchell family, and our team, have used tastyworks brokerage services. However, any brokerage firm should be able to provide the services needed for stock trading/investing. Clients are encouraged to do their own research and find a trading software that best fits their needs.

We encourage them to consider tastyworks as we have found it to meet or exceed expectations.

Tastyworks, Inc. (“tastyworks”) has entered into a Marketing Agreement with Marketing Agent (“TRADEway”) whereby tastyworks pays compensation to TRADEway to recommend tastyworks’ brokerage services. The existence of this Marketing Agreement should not be deemed as an endorsement or recommendation of TRADEway by tastyworks and/or any of its affiliated companies. Neither tastyworks nor any of its affiliated companies is responsible for the privacy practices of TRADEway or its website. Tastyworks does not warrant the accuracy or content of the products or services offered by TRADEway or this website. TRADEway is independent and is not an affiliate of tastyworks.

### **Tradier Brokerage Firm:**

TRADEway receives compensation for sending customers to Tradier Brokerage. The Mitchell family, and our team, have used Tradier brokerage services. However, any brokerage firm should be able to provide you the services needed for stock trading/investing. Clients are encouraged to do their own research and find a trading software that best fits their needs. We encourage you to consider Tradier Brokerage as we have found it to meet or exceed expectations.

Tradier Brokerage has entered into a Marketing Agreement with Marketing Agent (“TRADEway”) whereby Tradier Brokerage pays compensation to TRADEway to recommend Tradier’s brokerage services. The existence of this Marketing Agreement should not be deemed as an endorsement or recommendation of TRADEway by Tradier Brokerage and/or any of its affiliated companies. Neither Tradier Brokerage nor any of its affiliated companies is responsible for the privacy practices of TRADEway or its website. Tradier Brokerage does not warrant the accuracy or content of the products or services offered by TRADEway or this website. TRADEway is independent and is not an affiliate of Tradier Brokerage.

### **LIFE SURGE, LLC**

Life Surge LLC (“Life Surge”) has entered into a Participation Agreement with TRADEway whereby TRADEway pays compensation to Life Surge to recommend TRADEway’s products/services at specific live events (Trade Surge Events, which are owned and operated by Life Surge, LLC). TRADEway and Life Surge/Trade Surge are independent and are not affiliated beyond the Participation Agreement. Life Surge receives compensation for sending clients to TRADEway. The TRADEway Team will use Life Surge (via Trade Surge Live Events) to help match clients with TRADEway’s education and support.

### **iVest**

Creator of “Charts by TRADEway” has entered into a marketing agreement with TRADEway whereby TRADEway pays compensation to iVest for the creation and maintenance of our charting system. However, any charting software firm should be able to provide the services needed for stock trading/investing. Clients are encouraged to do their own research and find a charting software that best fits their needs. We encourage them to consider Charts by TRADEway as we have found it to meet or exceed expectations.

## **Companies in which David Mitchell owns majority shares:**

### **Exos Aerospace Systems and Technologies, Inc.**

David Mitchell has an ownership interest in TRADEway and is an Investment Advisor. He also has an ownership interest in EXOS Aerospace Systems and Technologies, Inc., an aerospace company seeking to build reusable rockets. The two companies have common ownership and control.

Clients of TRADEway have been offered the opportunity to invest in EXOS stock. Because of the above described roles of Mr. Mitchell there is an inherent conflict of interest in his recommendation to purchase EXOS stock. As a current owner and officer of EXOS, Mr. Mitchell is motivated to increase the funding of EXOS.\* You should carefully consider this in your evaluation of EXOS. Mr. Mitchell is a control person of TRADEway and any purchase of EXOS stock benefits Mr. Mitchell.

**E.G. Hall Oil Company Inc.** (Oil and Gas Production Co.) and **Petracorp LLC** (Oil and Gas) Exploration Co.

The four companies have common ownership and control, in that all are owned by Mr. Mitchell. Because of the above described roles of Mr. Mitchell, there is an inherent conflict of interest in his recommendation to purchase stock in any company that he has ownership in.

Note:

Section 206(3) of the Advisers Act prohibits TRADEway and any Employee or other affiliate from trading with any client on a principal basis, or from recommending an agency cross trade to both participants, unless TRADEway discloses the capacity in which it is acting to each participating Client in writing before completion of the transaction, and obtains each participating Client's consent to the transaction.

The CCO must be notified of any proposed principal transaction involving a Client and must provide approval before the principal transaction is affected. Prior to the settlement of any principal transaction, the CCO is responsible for obtaining any affected Client's informed written consent to the transaction. Any such consent should be retained by the CCO.

Mr. Mitchell only offers Private offering Stock in these companies to qualified, sophisticated investors. Investing in these companies is a high-risk proposition. One should be willing to lose his/her entire investment in these companies in order to be a purchaser of said stock.

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

### **Section A.**

#### **Code of Ethics**

TRADEway has adopted a written Code of Ethics in accordance with Rule 204A-1 under the Advisers Act that sets forth ethical standards of business conduct, including compliance with applicable federal securities laws, which TRADEway requires its supervised persons to uphold. This Code of Ethics is intended to reflect fiduciary principles that govern the conduct of TRADEway's employees and its supervised persons in those situations where TRADEway acts as an investment adviser (as defined under the

Advisers Act) by providing investment advice to clients. It consists of an outline of policies regarding several key areas: standards of conduct and compliance with laws, rules and regulations, protection of material non-public information and guidance that is provided in firm-wide policies and procedures. All employees are required to review the Code of Ethics annually and to sign an acknowledgement of such review. Violations of the Code of Ethics may result in disciplinary action or dismissal. TRADEway will provide a copy of its Code of Ethics to any client or prospective client upon request.

## **Section B.**

### **Participation or Interest in Client Transactions**

Not applicable.

### **Restrictions on Personal Securities Transactions**

TRADEway's Code of Ethics prohibits certain types of personal securities transactions in accordance with Rule 204A-1. This policy specifies certain permitted personal investments and intends to establish reporting and preclearance requirements and enforcement procedures. Certain types of security, such as those offered in initial public offerings and private placements, are subject to a preclearance requirement. The Code of Ethics also includes guidelines relating to insider trading and gifts. TRADEway personnel may not receive gifts and gratuities from persons with whom TRADEway does business in excess of \$250 in fair value from one particular source during the calendar year. Receipt of such gifts and gratuities might be viewed as causing a conflict of interest for TRADEway in selecting brokers and other service providers. TRADEway personnel may attend events such as sporting events or the theater, meals with clients, educational, training, or informational events in the company of and at the expense of a giver, as long as the expense is reasonable and not lavish or extravagant in nature. Associate persons are directed to contact the CCO regarding these areas.

Access Persons must submit their brokerage statements quarterly to the Compliance Officer for review and archiving. Employees may purchase and sell securities for their own accounts that have also been recommended to clients. The Code of Ethics will be designed to ensure that the personal securities transactions and interests of the employees will not interfere with their ability to make decisions that are in the best interests of clients. Nonetheless, because the Code of Ethics permits employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client. We have procedures in place to protect the client and make them aware of any possible issue that may arise.

### **Disclosure of Personal Investments**

TRADEway officers and employees may maintain personal investments. They may also maintain personal brokerage accounts subject to the firm's Code of Ethics.

Access Persons will be required to provide quarterly reports to the Chief Compliance Officer or other designated person showing transactions in their personal accounts, and will be required to disclose annually all securities held on their behalf. Certain securities are exempt from reporting based upon a determination by the Chief Compliance Officer or other designated person that such securities do not pose any material conflicts. These reports will be monitored regularly to reasonably prevent conflicts of interest between TRADEway and its clients. While it is unlikely to occur, there is an inherent conflict of interest between our fiduciary duty of best execution for our clients and the apparent self-interest of employees trading in the same securities contemporaneously.

## **Insider Trading Policy**

TRADEway may, from time to time, come into possession of material nonpublic or confidential information which, if disclosed, might affect an investor's decision to buy, sell, or hold a security. Under applicable law, TRADEway may be prohibited from disclosing or using such information for its personal benefit or for the benefit of any other person, regardless of whether that person is a client. Accordingly, should employees of TRADEway come into possession of material nonpublic or other confidential information with respect to any company, they may be prohibited from communicating such information to, or using such information for the benefit of, clients and have no obligation or responsibility to disclose such information to, nor responsibility to use such information for the benefit of, clients.

The Code of Ethics has adopted a policy in accordance with Advisers Act Section 204A, which establishes procedures to prevent the misuse of material nonpublic information by supervised persons. Supervised persons are prohibited from trading, either personally or on behalf of others, while in possession of material nonpublic information in violation of the law. Any supervised person who fails to observe the aforementioned policies risks serious sanctions, including dismissal and personal liability.

### **Item 12: Broker Practices**

Neither TRADEway nor any of its supervised persons accept compensation for the sale of securities.

If TRADEway were to engage a broker-dealer, TRADEway would disclose such engagement as required, clients may independently engage their own broker-dealer.

### **Item 13: Review of Accounts**

TRADEway does not take/have custody of client assets. However, TRADEway does review personal finances for our Plan Your Path clients. Clients for this event disclose some of their financial information ahead of time in order for TRADEway to build a personal 5-year business plan to be presented to the client. The plan provides a projection of monthly milestones catered to the client's specific needs and goals.

TRADEway also reviews personal financials for AMPT clients to help them find the portfolio that best meets their needs based on risk tolerance, age, and a number of other factors. TRADEway assists the client and provides advice, but does not have custody of client assets. TRADEway does have discretionary trading authority granted by the client to TRADEway for the AMPT AIM, SEED, and UP portfolios.

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

TRADEway does not intend to receive any economic benefits other than the fees paid to the Firm by its clients, as described in Items 5 and 6. TRADEway and its representatives do not intend to receive any economic benefits from any third parties with respect to the advisory services offered to clients.

In compliance with applicable law, TRADEway may from time to time pay event attendance or participation or other fees, underwrite charitable or industry events, or provide gifts of value to, or at the request of, an organization or individual (including TRADEway affiliates) that, among other things: (i) offers or includes products or services of TRADEway or an affiliate in a particular program; (ii) permits TRADEway or an affiliate access to their financial advisors, brokers, employees, or other affiliated persons

to provide training, marketing support, and educational presentations on products or services affiliated with TRADEway or an affiliate; and/or (iii) refers or has referred a client to TRADEway. TRADEway may obtain products and/or services from consulting firms separate and apart from any recommendations made to clients for TRADEway investment services. Additionally, certain affiliated or third-party institutions may provide financial support on a voluntary basis for marketing, educational, and sales meetings of TRADEway or affiliates.

#### **Item 15: Custody**

TRADEway is not a qualified custodian and does not intend to provide custodial services to its clients.

#### **Item 16: Investment Discretion**

TRADEway does have discretionary authority granted by the client for the management of the AMPT AIM, SEED, and UP portfolios.

#### **Item 17: Voting Client Securities**

Not Applicable.

#### **Item 18: Financial Information**

Not applicable.

#### **Item 19: Requirements for State-Registered Advisers**

Not applicable.

#### **Item 20: Biography of Key Officers**

TRADEway is a family owned and operated business. David Mitchell and his wife, Charlotte, are the co-owners and founders of TRADEway, but each of their grown children play a key role in the company as well. David's daughter, Katie Huber, is the Chief Operating Officer; his son-in-law, David Huber, is the Chief Brand Officer and the Executive Vice President; his son-in-law, Colin Calvert is the Chief Technical Officer and Chief Financial Officer; his son, Paul Mitchell, is the Podcast Production Manager; his son, Benjamin Mitchell, is the Precious Metals Operations Manager and Team Manager; and his youngest son, Matthew Mitchell, is the Media Production Manager. Together, the TRADEway team provides financial education and support to thousands of families across America each year.

#### **David Mitchell**

Founder, President, and Chief Executive Officer; Investment Advisor Representative

Mr. Mitchell earned a BA degree in Business in 1976 and an MBA degree in 1978 from Baylor University. He currently is President of his fifty-year-old oil and gas drilling and production company with interests in the Permian Basin of West Texas. Even though David has been with this company since 1978, he also has experience in manufacturing. He founded and managed, with his father, the Van Zoeren Pipe Organ Company, of Portland, Oregon, which manufactured and installed influential pipe organs including the Crystal Cathedral, and 2nd Baptist Church, Houston, Texas. After financing and building the company from start-up to maturity, he and his father sold the Van Zoeren Pipe Organ Company to the Columbia Broadcasting System (CBS) television network in 1984.

David is also founder and C.E.O. of TRADEway. Mr. Mitchell and his family earned their initial success in oil. Investing in the stock market was a central principle taught to him from an early age by his grandfather. David has spoken at university business schools, to

both faculty and students, on the topic of the entrepreneurial spirit and the importance of the family business. He has presented cash flow investing events across the country through his TRADEway live event system. Although David is not always actively trading securities in his personal account, when he is trading, he utilizes the TRADEway methods as well as other investing strategies. He loves sharing his trading and investing knowledge and experience with families across the country.

David has been in the ministry for over 35 years. His experience includes youth ministry, serving as Associate Pastor under three different pastors, and he has been the Sr. Pastor of Park Meadows Church in Corsicana, Texas, for over 25 years. David loves studying and teaching the Word of God, and he loves the Lord who wrote it. He has never taken a salary from a church due to God's blessings. David especially enjoys finding principles in the Bible that relate to business, and sharing them in entrepreneurial events.

This combination of business education and experience, together with the teaching skills which come from years in the ministry, make David's events a truly unique and life changing experience for the whole family.

## **Katie Huber**

Chief Operating Officer

Mrs. Huber earned a Bachelor's degree in Marketing from LeTourneau University, graduating Magna Cum Laude in 2006. While attending LeTourneau, Katie served as Vice President of Communication, and the next year served as Executive Vice President of the LETU Marketing Club. During her senior year, Katie founded and became President of the LETU Photography Club, which became the largest student-led organization on campus. She was also instrumental in organizing large events on campus. Upon graduation, Katie received the highly sought after Excellence in Marketing award.

In 2001, Katie received her Texas Professional Photographer's Degree in Senior Portraiture, and in 2002, she received her Texas Professional Photographer's Degree in Wedding Photojournalism from Texas A&M University. She still enjoys photography.

Katie began working with TRADEway in 2006. Her two-fold strength in management and marketing bring important leadership and breadth to the leadership team of TRADEway. Katie currently serves as Chief Operating Officer. She manages the corporate team in all areas, as well as plans, prepares, and implements short-term and long-term goals that the company has set. During her first year as Chief Operating Officer, Katie was instrumental in exceeding the company's growth and sales goals; each year since then she helped TRADEway surpass its growth projections in all areas making it a sought-after company in the realm of investment education in the United States. Katie has led the TRADEway team successfully for nearly two decades.

## **David Huber II**

Executive Vice President; Chief Brand Officer; Investment Advisor Representative

David received his Bachelor's Degree in Marketing from LeTourneau in May, 2005. Dave was the President of the LeTourneau University Marketing Club. During his term, the Club won first place in the American Marketing Association's National Booth-Exhibit Competition. Dave played a key role in organizing a globally broadcasted competition sponsored by Patterson Nissan in Longview, Texas. Upon graduation, Dave received the highly esteemed Leadership Award, as well as the top Sales Management Award.

Dave began working with TRADEway in 2005. He currently serves as the company's Chief Brand Officer, overseeing the company's brand imaging, and the overall customer experience. He works side by side with David Mitchell and Katie Huber to ensure the corporate goals are being reached. He also serves as an Investment Advisor and speaker, working with clients to help them achieve their trading goals.

### **Marion A. Keyes, J.D., LL.M., ACAMS**

Chief Compliance Officer and General Counsel

In addition to being the CCO for TRADEway, Marion is also a Tax Attorney and Entrepreneur. He primarily focuses on companies that are in their first decade of existence, particularly in the financial services industry.

Marion is a lawyer and a member of the Bar in both Texas and Colorado. He attended universities in both the People's Republic of China and here in the United States. Marion then attended classes and graduated from the School of Law at the University of Washington in St. Louis (2000) where he earned his Juris Doctorate degree (J.D.). After practicing law for almost a decade, he then attended post-doctoral studies at the University of Denver, Graduate Tax Program where he earned the LL.M. degree in Tax Law (2012).

In addition to the above formal education programs, in 2014, Marion also studied for and received the "CAMS" designation ("Certified Anti-Money-Laundering Specialist") from ACAMS, the Association of Certified Anti-Money Laundering Specialists. Marion then pursued and received (in 2015) the advanced CAMS-Audit certification, which indicates that he is competent to audit any type of financial institution for its KYC/AML compliance procedures.

Marion has been an Estate Planning Attorney, Tax Attorney, Trial Attorney, and Entrepreneur for over 35 years. In general, he has focused the majority of his efforts on financial service companies and technology-focused startup projects/businesses.

Marion is the Founder and Chief Counsel for Rivflow, a Hong Kong-based digital currency services company. He is also the Chief Counsel for Exos Aerospace.

### **Charlotte Mitchell**

Vice President

Mrs. Mitchell earned a BBA degree in Marketing from Baylor University in 1978. Since 1995, Charlotte has served as Vice President of Mitchell & Associates, Inc., and E. G. Hall Oil Company, Inc. Charlotte was under contract as a Certified National Trainer for a large publicly traded marketing company for four years, and has conducted large marketing seminars. She is a valuable source of information in product design and determining marketing strategies for TRADEway.

### **Colin Calvert**

Chief Technology Officer & Chief Financial Officer

Mr. Calvert helped TRADEway create customized software and platforms to fit its unique business model and meet goals. He has been instrumental in not only the development of the systems, but in the maintenance of them as well. Colin's strengths in the area of finance helped TRADEway achieve financial stability and security. He has truly been a



game-changer for the leadership team of TRADEway.

## **Bio of Investment Advisor Representatives:**

### **David Mitchell**

#### **Bio:**

David is President of E.G. Hall Oil Company, Inc.; President and C.E.O. of TRADEway; President, Exos Aerospace Systems & Technologies, Inc.; Managing Partner, Petracorp; Sr. Pastor, Park Meadows Church; Host of “The Word on Investing” podcast & host of TRADEway’s YouTube Channel. He has written sermons, booklets, gospel tracts and Bible studies, and twenty-two work books and study courses on investing in the U.S. stock and options markets. He has been married 46 years, has five children and thirteen grandchildren.

#### **Educational Background:**

BA 1976; MBA 1978, Baylor University

#### **Business Experience:**

Fourth generation entrepreneur and family businessman. Over thirty-five years’ experience in the oil industry, manufacturing, marketing, and investments.

#### **Other Business Activities:**

Sr. Pastor, Park Meadows Church

#### **Disciplinary History:**

None

### **Dave Huber II**

#### **Bio:**

Dave lives in Mexia, TX with his wife Katie, and three children. He has been an active stocks and options trader since 2006 and has been teaching others how to trade since 2010. He enjoys family time, traveling, sports, marketing, and the outdoors.

#### **Educational Background:**

BA in Business Marketing from LeTourneau University in Longview, TX.

#### **Business Experience:**

Has worked for TRADEway since 2005 and is currently serving as the Chief Brand Officer and as a corporate speaker and Investment Advisor Rep.

#### **Other Business Activities:**

Currently owns his own marketing, sales, consulting, and graphic design company called Public Ruckus, Inc. Dave is also Vice President of Marketing for Exos Aerospace.

#### **Disciplinary History:**

None

### **David Huber (Sr.)**

#### **Bio:**

David was raised in a military family spending the majority of his childhood in Taiwan.

He moved to Texas in 1977 where he met and married the love of his life. They raised 3 children together. David and his wife have 5 grandchildren that are a large part of their lives now.

**Educational Background:**

Graduated High School from TaiPei American School

David did his undergraduate studies at Oklahoma State University.

**Business Experience:**

David spent 31 years working with Radio Shack in many different levels of management. He also has two years of restaurant management.

**Other Business Activities:**

David has been investing since 2008, and teaching others to trade since 2012. He also manages a tree farm and is working to open a wedding venue.

**Disciplinary History:**

None

**Geoffrey Nance**

**Bio:**

Geoffrey Nance has been in the ministry for over two decades and served in several churches during that span. He enjoys teaching and trading. He is married and has four children.

**Educational Background:**

BA in Religion from Baylor University

MDIV w languages from Southwestern Baptist Theological Seminary Business

**Experience:**

For nearly a decade, Geoffrey has been a speaker, coach, and helped in various support roles for TRADEway and its clients. He currently serves as the Lead Investment Advisor Rep, as Director of Top Gun Elite, and leads two of the Precision Pro programs.

**Disciplinary History:**

None

**Ben Russell**

**Bio:**

Ben Russell is an active trader who enjoys following the market and constantly learning about how the market behaves. He is a technologist as well, and enjoys being able to apply his passion for finance with technology as a trader. Ben has been married for over 20 years and enjoys spending time with his family camping and enjoying the incredible creation God has made in the Pacific Northwest. Ben currently serves as the Director of Market Corners for TRADEway, Sr. Analyst of AMPT, and Director of Precision Pro Programs for TRADEway.

**Educational Background:**

Bachelors of Business Administration in Information Decision Sciences from the University of Texas El Paso

**Business Experience:**

Ben has over 20 years in the technology industry focused on storage, data recovery and cloud architectures. He has been an active trader since 2011 and enjoys sharing his trading expertise as part of TRADEway.

**Other Business Activities:**

Technology Architecture & Business Process Consulting

Marketing and Webinar Consulting

Technology Automation Sales & Integration Consulting

**Disciplinary History:**

None

**Jared Russell**

**Bio:**

Jared Russell has been actively trading in the stock market for over 8 years. He focuses on simple price action to make his trading decisions. He lives in Texas with his wife and family. Outside of trading, he enjoys playing golf and is having a blast raising his two young sons. Jared serves as a Coach and as the Director of Watch Webinars, as well as Director of Workshop Pro support program for TRADEway.

**Educational Background:**

2 years at the University of Texas at San Antonio studying architecture Business

**Experience:**

Owner/operator of a Christmas lighting and decor business since 2003

Operator of a retail fireworks warehouse since 2003

Active trader

**Other Business Activities:**

Owner/Operator of Christmas Lighting and décor business, as well as a fireworks warehouse.

**Disciplinary History:**

None

**Jenny Taylor**

**Bio:**

Jenny is an active trader. She enjoys studying the financial markets and economics, while continually honing her craft of trading and investing. Jenny has been married for more than 15 years and has four wonderful boys. She enjoys her family, studying God's word, reading and listening to sermons, and cooking and baking. Jenny has been an Investment Advisor Representative since 2017 and currently serves as such in the AMPT Division of TRADEway.

**Educational Background:**

Bachelor of Science - Business Administration - Crown College - St. Bonifacius, MN

**Business Experience:**

TRADEway Coach- 2010-2013

Senior Administrative Assistant to CEO of TRADEway- 2013-2017

Event Speaker TRADEway- 2011-2017

Investment Advisor Representative - 2017-current

AMPT Investment Advisor Analyst- 2019-current

**Other Business Activities:**

None

**Disciplinary History:**

None

**Pete Breidt**

**Bio:**

Pete Breidt is a full time active stock trader. Since 2012 he has evolved from being indifferent toward the markets to understanding and applying fundamental, technical, and market tone analysis on a daily basis. He is fascinated at how knowing just a little about the market changes perspectives on world news and events. Pete served in the US Air Force for 22 years specializing in space operations and requirements for new systems. He then supported both the National and Air Force space communities as a consultant until retiring from the workforce in 2014. Aside from trading, he and his wife stay busy maintaining and operating their secluded horse ranch near the wet mountains of Colorado.

**Educational Background:**

Bachelor of Science in Basic Sciences from USAF Academy

Master of Science in Administration from Central Michigan University Business

Experience:

3+ Years in Corporate Engineering Positions

**Other Business Activities:**

Freelance web developer

Small Business Owner

Active Trader

**Disciplinary History:**

None

**Ross Query**

**Bio:**

Ross is an active trader who has been able to integrate the TRADEway system with his full time job as a university professor and healthcare professional. Ross advanced his trading education first as a TRADEway student 13 years ago, and as a trainer/educator for the last 10 years. Ross has a passion for applying the skills he uses in educating students in the complex world of rehabilitation science to help TRADEway students understand how to trade in the ever-changing markets and strive to become successful in their own financial goals. Ross has been married for 20 years, and he and his family share in a diversity of mission support opportunities for children in underserved areas of the world.

**Educational Background:**

Bachelors of Science in Exercise Science from the University of Texas at Arlington,

Masters of Science in Physical Therapy from Texas Woman's University, Doctorate of

Philosophy in Biomedical Science from the University of North Texas Health Science Center.

**Business Experience:**

Owned his own business for 5 years; TRADEway corporate speaker and Investment Advisor Rep.

**Other Business Activities:**

Director of Outpatient Clinical Services

**Disciplinary History:**

None

**Blair Nightingale**

**Bio:**

Blair Nightingale is currently enjoying learning as much about trading and finance as he can while applying his skills in the markets. He has had the opportunity to serve on extensive overseas missions, many arenas of domestic ministry and now is thrilled to be imparting to others all over the country the knowledge base that helps one to take control of their financial future. He and his wife currently live in California, where Blair enjoys writing and producing original music, as well as being an integral member of the TRADEway corporate team.

**Educational Background:**

Studied Music for 2 years at RDC; completed a 3 year ministry certificate program at the Bethel School of Ministry.

**Business Experience:**

Coordinating, booking, managing and performing in a full time national level band. Blair currently serves as a TRADEway Investment Advisor Rep as well as helping students all over the country explore and understand how money can work better for them through the TRADEway community.

**Other Business Activities:**

None

**Disciplinary History:**

None

**David Verbruggen**

**Bio:**

David is an active trader who lives in Portland, OR. He was born in Baltimore, MD but grew up mostly in Belgium and Portland. David worked as a corporate/charter pilot and also owned his own small flight school. After flying, David had various jobs in real estate, ministry, airline customer service, and sales. He loves traveling, playing team sports, and is also an accomplished trumpet player. David met his wife, Christy, while attending LeTourneau University in Longview, TX, and their first child, Katelyn, was born in August 2020, they welcomed their second daughter in 2023. David became a TRADEway student in 2019 and joined the TRADEway team in 2021, where he is currently the Director of Charts by TRADEway and an Investment Advisory Representative for the AMPT Division.

**Educational Background:**

Bachelor of Science in Aeronautical Science with Concentration in Professional Flight from LeTourneau University in 2011.

**Business Experience:**

Owner of DJV Aviation LLC where he provided flight instruction to students  
First Officer/Pilot In Command on multiple types of business jets and other aircraft  
Director of Sports and Recreation Ministry  
Customer Service Supervisor for Southwest Airlines

**Other Business Activities:**

Real Estate Agent (2014)  
Freelance Trumpet Player

**Disciplinary History:**

None

**Caleb Pritchett****Bio:**

Caleb joined TRADEway as a student in 2013 when he and his father attended a Step 1 taught by David Mitchell. After Caleb graduated high school, he attended Oklahoma Baptist University for a full year, pursuing a degree in history, before he felt called to do something different. He returned home, took the fall semester of 2016 off, and by January 1st of 2017, decided to pursue trading as a career. Caleb has been trading in the markets actively for over 7 years. He lives in Fort Worth, TX, and is looking forward to starting a family and passing on his knowledge to the next generation to establish his legacy. He enjoys gaming, reading, cooking, and creative writing in his spare time, and is hoping to become a published author soon.

**Educational Background:**

1 year at Oklahoma Baptist University studying history and philosophy.

**Business Experience:**

Caleb has worked in several high stress jobs, including in a 5-star catering company, and even as a ball boy in the NBA. Outside of his coaching position as an Investment Advisor Representative at TRADEway, Caleb co-owns a corporation with his father through which they trade and plan to pursue other business ventures.

**Disciplinary History:**

None

**Casin South****Bio:**

Casin attended his first TRADEway class at 18 years of age, and has been a part of TRADEway ever since. He completed Steps 1-4 within a year, and began actively trading. He is a registered investment advisor and coach for TRADEway and enjoys working with students one on one to help them better understand the system. Casin enjoys studying the markets and playing golf.

**Business Experience:**

Three professional securities licenses  
Investment Consultant Assistant

**Disciplinary History:**

None

**Denny Foster****Bio:**

Denny started actively trading in 2017 after selling a business. He currently owns a lighting showroom and a painting supply company. He has over 25 years of collective experience in entrepreneurship, operations management, and sales leadership. Throughout his career, he has demonstrated excellence in the areas of leadership, strategic execution, and relationship building.

**Business Experience:**

Denny left direct sales as a top sales leader in Telecom, founded and built several businesses. He built and scaled his businesses on the principles of integrity, accountability, self-motivation, collaboration, hard work, and continuous learning. His entrepreneurial years continue to be profitable, and he has achieved the business goals he set for himself. He maintains a respected reputation for world-class client experience, sales team leadership, and business development. His experience translates well across multiple industries and positions. He thrives on challenges and targeting opportunities that will allow him to continue to introduce proactive ideas and create and execute innovative strategies.

Denny has served on several boards, including the Chamber of Commerce Board of Directors, Rotary Club, Community Foundation and received the Chamber of Commerce Business Person of the Year award.

**Disciplinary History:**

None

**David Turner****Bio:**

David grew up in the hotbed of technology known as the Silicon Valley, and became involved in the ministry in the Tenderloin district of San Francisco in 2000. He met his wife there, and shortly after, they moved to the Fiji Islands, where they raised four kids and lived for seven years.

**Educational Background:**

B.A. in Music from San Francisco State University  
M.A. in Theology from Fuller Seminary

**Business Background:**

David has been trading full-time since 2020. He currently serves as a Coach and Mentor

at TRADEway.

**Disciplinary History:**

None

**Item 22: ADV Part 3 Form CRS**

**FORM CRS/ ADV PART 3**

**1. Introduction:**

Designer Technologies, Inc., doing business as TRADEway, is an Investment Advisor registered with the Securities and Exchange Commission (SEC). We are NOT a Broker-Dealer.

Free and simple tools are available to research firms and financial professionals at: [Investors.gov/CRS](https://www.investors.gov/crs). They provide Educational materials about broker-dealers, investment advisors and investing.

**2. Relationships and Services:**

**“What investment services and advice can you provide me?”**

TRADEway offers education/support to teach individuals how to do short-term trading and long-term investing in the U.S. Stock Market. We offer a variety of training options including subscription-based memberships which may be canceled at any time, plus a la carte options such as on-demand courses, live/virtual event, weekly webinars, and much more. We teach students who have little to no experience, all the way up to advanced level, with strategies and techniques to match the student’s level. One of the benefits of membership includes interactive, live/weekly webinars to discuss stocks and analyze them throughout the week. We also provide coaching to support students and answer questions during business hours. Additionally, we have long term strategies taught in our AMPT program (Assisted Client Managed Portfolios by TRADEway) for those who wish to learn how to manage their long-term retirement funds, as well as Precious Metals investment education and support.

**(i). Monitoring:**

We do not monitor the retail investors' investments, rather we monitor the market movement and advise actions that our retail investor (students) may decide to take/make in their brokerage account to achieve potential profit and limit potential losses. We are not a broker dealer.

**(ii). Investment Authority:**

We do not have custody of our retail investor (student) accounts. Our students independently trade and manage their own accounts.

If you are looking for management assistance with your long-term accounts and inquiring about our AMPT program, you might ask this question:

**“Given my current financial situation should I choose an investment advisory service?”**

To answer your question, we must first assess your current financial situation and identify your current goals via an application. Upon completion of the application we can



discuss, and you can make the decision if we are a good fit for you or not.

**“How will you choose investments to recommend to me?”**

We do this based on the information you provided in your application regarding your risk tolerance, your goals, and length of time you have to reach your goal. We make the recommendation; you make the decision.

**“What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”**

TRADEway is owned and managed by the Mitchell family. David Mitchell holds a BA and an MBA in business from Baylor University. He is also an Investment Advisor Representative. Our teachers/speakers/coaches are also Investment Advisor Representatives, and many of them hold degrees and licenses for various skill-sets (see bios in our Form ADV for full details).

You must be a Registered Investment Advisory firm to offer investment advice. You must be an Investment Advisor Representative as an individual offering investment advice and have a Series 65 license. This means you obtained the education and had the ability to pass the Series 65 Uniform Investment Advisor Law Exam. For further information regarding the education and qualifications of TRADEway’s owner, management and staff, please visit our website: [www.tradeway.com](http://www.tradeway.com) and download our ADV (firm brochure).

**(iii). Limited Investment Offerings:**

Not applicable to our business. We are not a broker dealer selling securities; and do not offer proprietary products other than our educational products; Our advice is limited to the education that we offer.

**(iv). Account Minimums and Other Requirements:**

TRADEway AMPT program requires a minimum account size of \$5,000.00. For additional information regarding our products and services, please visit our website at [www.tradeway.com](http://www.tradeway.com) and access our firm brochure (ADV).

**3. Fees, Costs, Conflicts, and Standard of Conduct:**

**“What fees will I pay?”**

Our educational products/services vary in price from \$9.97 - \$66,000 with discounts and funding options available. We have ongoing memberships which are billed monthly and you may cancel at any time, as well as ala carte programs/courses which you pay for one-time and have lifetime access.

AMPT fees range from \$99-\$2999 and education fees for AMPT range from \$997 to \$1938, with discounts available.

AMPT management fees based on portfolio size are from 0.85% to 1.85% annually.

**Additional Information:**

You will pay fees and costs for our education/support whether you make or lose money on your investments. Fees and costs will reduce the amount of money you make over time. Please make sure that you understand what fees and costs you are paying. TRADEway does not participate in wrap fee programs.

**“What are your legal obligations to me when acting as my investment advisor?” How else does your firm make money and what conflicts of interest do you have?”**

We must fulfill our “fiduciary obligation” to you, which simply means we must put your interests ahead of our own. We have a Code of Ethics which outlines our policies and procedures for avoiding conflicts of interest as well as how we address them should they occur. Additional income is earned through educational products/ services offered via subscriptions and ala carte, as well as marketing agreements for referrals.

**Standard of Conduct:** When we act as your investment adviser, we must act in your best interest and not put our interest ahead of your interest. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. TRADEway is paid a fee in addition to those listed above through marketing arrangements. We currently have agreements with Tradier and Tastyworks Brokerage Services which compensate us for referrals.

**“How do your financial professionals make money?”**

Our Investment Advisor Reps and employees have the opportunity to earn commissions above their normal salaries for the sale of products and services.

#### **4. Disciplinary History:**

***“Do you or your financial professionals have legal or disciplinary history?”*** No one at TRADEway has any legal or disciplinary history. There is a helpful search tool at [Investor.gov/CRS](https://www.investor.gov/crs) to research your financial professional.



### The Echo Principle

Finding Business in the Bible!

\$49.95



### The Truth will Set You Free

Authoritative Debt Reduction

\$29.95



### Financial Fables

Three Beliefs that Stifle Growth Investing

\$49.95



### Manage Your Financial Advisor

When NOT to Use Cruise Control in Your Investments!

\$49.95



### Trade the Roll

Adapt Your Trading to a Sideways Market  
(NOTE: This is not the same as attending a Step 1: Start Your Journey Event and should not be used in place of Step 1 event training.)

\$285.00



### Rule the Roll

Advanced Level Rolling Stocks



### Trade the Trend

Short-Term Leverage from Long-Term Trends



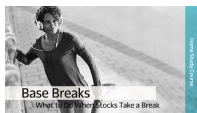
### Leverage Your Options

Prepare for Options Trading



### Lighting the Way

Finding Opportunities with Candlesticks



### Base Breaks

What To Do When Stocks Take a Break



### Fill in the Gaps

Take Shortcuts by Trading Gaps



### Turn Signals

Safer Decisions Through Indicators



### Splits & Crossroads

Six Ways to Trade Stock Splits



### Wealth is a God Idea

Learn Biblical Keys to Creating Wealth



### Take Advantage of Your Advantage

How to Do Well with the Skills God Gave You

\$850.00 each

**Breakthrough**

Need a Breakthrough in Your Trading Journey? That's what this course is all about!

**\$250****Stock Flippers**

Risk-Managed Strategy with an Intro to Options Trading

**\$297****Journal Series**

A Glimpse into the Trader Mindset While Trading

**\$840****Jumpstart**

How to overcome technical difficulties, personal roadblocks, uncertainty about your skillset and even a lack of motivation!

**\$1,000****Trader's Toolbox**

An In-Depth Training on Using the Think-or-Swim Platform (TOS)

**\$1,000****Cutting Out the Noise**

Narrowing Down Trades & Knowing When to Enter Trades

**\$1,000****Bottoms Up**

A Powerful Bullish Trade Setup and How to Find and Use It

**\$1,000****Flex Option Spreads**

Learn Advanced Spread Strategies with Neutral Setups

**\$2,099****Simply Price**

Learn the power of understanding price action and how it effects your trades

**\$2,500****Hidden Edge**

Finding an edge in trading can seem tough. But if you know what to look for, your option trading can take on a whole new light!

**\$2,500****Double Edge**

Take the hidden edge to a whole new level!

**\$4,500**



TRADEway

**Prospector's Membership****\$25**<sub>/mo</sub>

- Weekly Alerts and Closing Spot Prices on Precious Metals
- Junk Silver Alerts
- Special Member-Only Pricing on Metals Educational Products
- Fun & Informational Articles
- Coin Blog
- Unlimited Access to "Safety Step: Protect Your Future"



TRADEway

**Precision Pro Membership****\$49.95**<sub>/mo</sub>

- Precision Study Group (Online)
- Frequent Email Alerts
- Access to Precision Pro Community
- Access to Chat
- Practice Assignments



TRADEway

**Top Gun Elite Membership****\$89.95**<sub>/mo</sub>

- Tight-Knit Community of Dedicated Traders
- Exclusive TGE TRADEway Community
- Priority Coaching Access
- Follow-up Contact / Quarterly Updates
- Advanced Goals
- Additional Insight into Successful Trading
- Monthly In-Depth Stock Analysis



TRADEway

**Insider +****\$77**<sub>/mo</sub>

- Access to Stock Watchlists via Charts by TRADEway
- Access to Tutorials & Customer Support
- Daily Market Alerts (M-F)
- Access to Online Community
- Access to Market Watch Weekly Webinar
- (1) Charts by TRADEway Basic License

**TraderMax**

- Everything in Insider+ and...
- Access to Market Corner 2
- Access to Stock & Options Watch Webinars
- Email Updates on Watch Webinar Picks
- Access to TraderMax Community Pages
- Access to Coaches through Community Pages

**\$497** <sup>1x</sup>  
Setup  
& **\$197** /mo

**TraderPro**

- Everything in TraderMax and...
- Access to Spreads Watch Webinar
- Access to Market Corners 3 & 4
- Emails Updates on Watch Webinar Picks
- Access to TraderPro Community Pages
- Access to Live Trade Hour (Live Stock Analysis)
- Access to Active Trader Community Page
- Access to Coaches through Email and Community

**\$497** <sup>1x</sup>  
Setup  
& **\$397** /mo

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**Stock & Options Watch Webinar**

Practice current stock & options trades with TRADEway's team and students across the country. Ask questions, vote on your favorite plays, learn to keep the rules, and receive frequent email updates on the groups plays throughout the week, in this fun and interactive study group!

Included in  
TraderMAX &  
TraderPRO  
Memberships

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**Spreads Watch Webinar**

Practice current stock trades with TRADEway's team and students across the country. Ask questions, vote on your favorite plays, learn to keep the rules, and receive frequent email updates on the groups plays throughout the week, in this fun and interactive study group!

Included in  
TraderPRO  
Membership

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**Market Watch**

Fine-tune your stock trading knowledge and get answers to your trading questions while gleaning from the questions of other students from across the country. Get focused on the basic principles that TRADEway students must know, with the goal of being successful and increasing profits.

Included in  
Insider+,  
TraderMAX &  
TraderPRO  
Memberships

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**Market Corner 2**

Fine-tune your options trading knowledge and get answers to your trading questions while gleaning from the questions of other students from across the country. Get focused on the basic principles that TRADEway students must know, with the goal of being successful and increasing profits.

Included in  
TraderMAX &  
TraderPRO  
Memberships

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**Market Corner 3**

Fine-tune your credit spread trading knowledge and get answers to your trading questions while gleaning from the questions of other students from across the country. Get focused on the basic principles that TRADEway students must know, with the goal of being successful and increasing profits.

Included in  
TraderPRO  
Membership

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**Market Corner 4**

Fine-tune your debit spread & covered call trading knowledge and get answers to your trading questions while gleaning from the questions of other students from across the country. Get focused on the basic principles that TRADEway students must know, with the goal of being successful and increasing profits.

Included in  
TraderPRO  
Membership

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**Step 1: Start Your Journey**

The 2-day event that will radically change the way you look at investing! Learn your first professional stock trading strategy and everything you need to know to begin using it. Then, get a gameplan for what to do when the class is over.

**\$4,500**

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**Step 2: Know Your Options**

Learn different trading strategies, using options, that can present new opportunities in a changing market and provide higher return potential. Learn a method designed to profit when the market is crashing and how to recognize opportunities in the market.

**\$9,500**

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**Step 3: Run With Confidence**

Learn new strategies with built-in escape plans in case something goes wrong, so you can have more confidence in your trading. Discover the risk-managing strategies of credit spreads and the potential they can have to transform your trading!

**\$12,500**

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**Step 4: Reach Your Destination**

Your new skillset is ready to be tweaked. This course teaches you a way to trade that requires strong skills in choosing stocks and equips you to do so! Learn the high-return potential of debit spreads and the cash-flow strategy of covered calls.

**\$14,500**

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**Safety Step: Protect Your Future**

When it comes to learning the basics of precious metals investing, it can be hard to find an avenue that you can trust. That's why TRADEway provides a simple layout that breaks down the reasons why precious metals could protect your future. Learn a concise history of money and how you can use that to understand the cycles we are going through right now. Learn about the various kinds of investments out there and how you can know what is best for your personal goals.

**\$150**

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**Precision Step: Putting on a Play**

Often, regardless of your trading style, there are times when you wish you had chosen "that other trade" and missed a great opportunity. In this course you'll learn a professional strategy for testing out the waters in many opportunities at once. You'll learn methods for quickly identifying your favorite without exposing yourself to excessive risk.

**\$15,000**

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**Precision Step: News Moves**

You may have noticed, world news and events can mess up your investment strategies. This course teaches you how to use the news to your advantage as you find investment opportunities the news creates and learn the strategies TRADEway calls, "News Moves"

**\$17,500**

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### **Precision Step: Power Spreads**

You won't find this play anywhere else, because David Mitchell invented it. There are three components that must come together to make it work. The trade can go in any direction (Up, Down, Sideways) and you still have an opportunity to profit. When it works correctly, your money is only at risk for about 4 days.

**\$12,000**

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### **Precision Step: Plan Your Path**

- Create a 5-yr month-to-month personalized business plan.
- Set financial goals and objectives
- Make and implement weekly plans
- Learn special strategies only taught at this event.
- Learn new lessons every day to sharpen your skills.
- Learn biblical business principles taught by David Mitchell
- David Mitchell will personally teach concepts and answer questions.

**\$17,500**

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### **Precision Step: Sharpshooter**

Take advantage of market manipulation by "The Big Boys"  
Learn 6 keys to unlocking your vision for finding market manipulation  
Learn new concepts for incredible potential in your trading accounts.  
Learn 3 different strategies for finding the sharpshooter that works for you.  
This strategy can be used in any market scenario.

**\$17,500**

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### **Precision Step: Outlaw**

Using time decay and multiple sets to your advantage.  
Learn to identify the premise of a trade.  
Learn to understand market symmetry using historic lines and timing.  
Choosing the correct option using market maker expected moves  
Low volatility – Understanding and using Vega and Theta

**\$15,000**

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### **Precision Step (Add-On): Learning Labs**

Get to work and begin gaining practical understanding of your new precision step strategies. You'll receive a focused hands-on learning experience that dives into the specifics of placing these special trades.

**\$850**

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### **Workshop 1: Find Your Stride**

Perfect your entry points using multiple time-frame  
Learn how to analyze a trade's risk profile.  
How to manage the trades that work.  
Learn the "shielded covered calls" strategy & new trade setups.

**\$5,000**

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### **Workshop 2: Run Your Race**

Understand the premise of the trade & pattern setup.  
Start a personalized trading plan that best fits you.  
Increase profit potential with 2 new strategies.

**\$6,390**

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### Workshop 3: Master Your Journey

Learn new prediction indicators.

Learn ways to defend yourself in a trade gone wrong.

Know how to stay open to large gains when locking in your profits.

Learn about market manipulation & how to take advantage of it.

Learn new strategies!

**\$7,780**

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### Mentorship Programs

1-on-1, hourly, Mentorship Sessions hosted on Zoom with a Licensed Coach. Some packages come with a Custom Trading Plan.

**From  
\$8,000 to  
\$20,500**

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### The Word on Investing Summit

The annual culmination of TRADEway's "Word on Investing" podcast with David Mitchell and special guests. Topics include the market, entrepreneurialism, and more!

**\$297**

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### Trade in 30 Days Challenge

Learn and implement your first professional trading strategy in this 30-day online course. Includes thought provoking videos, daily tasks, and connection with our TRADEway coaching team through an exclusive coaching group!

**\$97**

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### Jumpstart Challenge

Finding yourself in an action rut? Being in a pitstop can be discouraging, so we've created a 5-day Jumpstart challenge to help you get "unstuck" and increase your potential for success!

**\$97**

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**A.M.P.T.**

TRADEway's most innovative program. **A**ssisted client-**M**anaged **P**ortfolios by **T**RADEway allows students to manage their entire portfolios with long-term & short-term investments. Start by learning how to manage your investments in a way that will not require all of your time and attention. Then choose from TRADEway's investment models with varying investment tolerances to best fit your investment objectives. TRADEway's investment advisor representatives will help you customize your investments for a portfolio that is truly tailored for you. Get guidance on when to rebalance your portfolio, free yourself from a financial advisor and save on costly management fees!

1-Time Fees:		Asset Management Assistant Fees:	(AMA)
Initial Consultation Fee:	\$99	Assets ≤ \$400	1.25%/yr of total assets
≤ \$200,000	\$250	Assets = \$400,001 - \$700K	1.20%/yr of total assets
> \$200,000	\$450	Assets = \$700,001 - \$1.5MM	1.15%/yr of total assets
> \$350,000	\$1,299	Assets > \$1.5MM < \$10MM	0.95%/yr of total assets
> \$700,000	\$2,999	Assets > \$10MM	0.85%/yr of total assets
Complex Plan	\$395/hr		
AMPT! Prep Fee (online course)	\$1,938		
Monthly Fee:			
AMPT ASSIST	\$45/month	AMA fees are divided into quarterly payments. For Prep class graduates who are AMPT Assist members...After the 3rd year, AMA fees half. Then after 3 more years, they drop by 0.035% every 3rd year until they reach a 0.43% minimum.	
Client Requested Portfolio Consultations	\$120/hr		