

# GOINVEST

SEC Registered Investment Advisor  
CRD # 291884

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Form ADV Part 2A  
Firm Brochure  
March 19, 2024

This brochure provides information about the qualifications and business practices of Go Invest LLC. Please contact our Compliance Department at 801-666-4373 if you have questions about the contents of this brochure.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Additional information about the firm is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as a CRD number. Our firm's CRD number is 291884.

While the firm and its associates may be registered and/or licensed within a particular jurisdiction, that registration and/or licensing in itself does not imply an endorsement by any regulatory authority, nor does it imply a certain level of skill or training on the part of the firm or its associated personnel.

The investment advisory services offered and any investment vehicles employed are (i) not deposits or other obligations of, nor are they guaranteed by, a financial institution or its affiliate; (ii) are not insured by the Federal Deposit Insurance Corporation (FDIC), National Credit Union Administration (NCUA), National Credit Union Share Insurance Fund (NCUSIF), or any other agency of the United States Government; and (iii) are subject to investment risks, including the possible loss of value. Further description with respect to investment strategies and their potential risks may be found in Item 8 of this brochure.

## **Item 2 - Material Changes**

This section provides information involving material events that have occurred involving the firm's brochure since its last annual update. There are no material changes to report.

The firm may at any time update this document and either send a copy of its updated brochure or provide a summary of material changes to its brochure and an offer to send an electronic or hard copy form of the updated brochure. Clients are also able to download this brochure from the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) or may contact our firm at 801-666-4373 to request a copy at any time.

As with all firm documents, clients and prospective clients are encouraged to review this brochure in its entirety and are encouraged to ask questions at any time prior to or throughout the engagement.

### **Item 3 - Table of Contents**

Item 1 - Cover Page.....	1
Item 2 - Material Changes .....	2
Item 3 - Table of Contents .....	3
Item 4 - Advisory Business.....	4
Item 5 - Fees and Compensation .....	5
Item 6 - Performance-Based Fees and Side-By-Side Management.....	6
Item 7 - Types of Clients .....	7
Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss .....	7
Item 9 - Disciplinary Information.....	10
Item 10 - Other Financial Industry Activities and Affiliations.....	10
Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	11
Item 12 - Brokerage Practices.....	12
Item 13 - Review of Accounts .....	14
Item 14 - Client Referrals and Other Compensation .....	15
Item 15 - Custody.....	15
Item 16 - Investment Discretion .....	16
Item 17 - Voting Client Securities .....	16
Item 18 - Financial Information .....	16

### **Important Information**

Throughout this document Go Invest LLC shall also be referred to as “the firm,” “firm,” “our,” “we” or “us.” The client or prospective client may be also referred to as “you,” “your,” etc., and refers to a client engagement involving a single *person* as well as two or more *persons*, and may refer to natural persons, legal entities and/or plan sponsors. In addition, the term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary (i.e., internet address, etc.). We attempt to avoid the permissive term “may” or “might” in this document; however, common written expression necessitates their periodic use to convey our message.

Our firm maintains a business continuity plan that is integrated within the organization to ensure it appropriately responds to events that pose a significant disruption to its operations. A statement concerning our current plan is available on our website.

### **Item 4 - Advisory Business**

Go Invest LLC is a Utah domiciled limited liability company formed in March of 2018 for general business purposes and became registered as an investment advisor with the SEC during April of 2018. Go Invest is a wholly owned subsidiary of RetireGO Inc. RetireGO Inc also maintains controlling interest of a pension consulting software firm that is described in Item 10 of this brochure.

Nathan D. Beck is the firm’s Chief Executive Officer and Chief Compliance Officer (supervisor). RetireGO Inc maintains controlling interest in the firm.

Go Invest LLC provides internet-based platform that assists the plan sponsor<sup>1</sup> in administering their retirement plan, as well as individual retirement account (IRA) services to interested parties, such as a plan participant’s rollover. Go Invest LLC may be engaged by plan sponsors pursuant to § 3(21) or 3(38) of the Employee Retirement Income Security Act of 1974 (ERISA). We do not sponsor or serve as a portfolio manager in an investment program involving wrapped fees. As of December 31, 2023, the firm has \$148,577,176 in assets under management. All the assets under management are managed on a non-discretionary basis. The firm does not manage any funds on a discretionary basis.

Interested parties access our secure website where they are offered our current firm brochure (Form ADV Part 2A) that describes our advisory firm, its services, potential fees, etc., as well as any material conflicts of interest that could be reasonably expected to impair the rendering of unbiased and objective advice, such as information found in sections (“Items”) 10 through 12 of this document. Our brochure is available in either portable document format (PDF) for download and/or may be printed on a local printer. If a prospective client wishes to engage our advisory firm for its services, they must then enter into an agreement to initiate the process.

Go Invest LLC guides the user in setting up a fully functioning account. Whether they are automatically enrolled plan participants or someone who signs up on their own, users experience our system’s simple and quick on-boarding process. Clients have access to their own dashboard where they receive

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<sup>1</sup> Throughout this brochure, the term “plan sponsor” or “sponsor” includes any person with the authority to review and implement plan investment decisions, such as executive management, investment committees, retirement plan committees, general counsel, plan advisor, etc.

summaries of their account value, investment performance, contribution data, and interactive reports. Our system reports should not be considered comprehensive financial planning, nor does it offer tax advice on holdings (i.e., tax-loss harvesting, etc.). Clients have access to complimentary, online financial wellness educational materials to assist them in making retirement decisions, introductory financial planning concepts, saving, etc. Individual retirement account (IRA) holders have access to the same tools and features when they engage the Go Invest LLC following their plan rollover.

Go Invest LLC provides a variety of investment options using indexed mutual funds and exchange-traded funds (collectively, “funds”) as the investment vehicle. Item 8 of this brochure provides additional details about our investment strategy, types of investment vehicles used, and their associated risks. We have organized the investment choices into three categories for participants to choose from:

1. **Qualified Investment Default Alternative (QDIA)** – This is the default choice for any investor who do not direct Go Invest LLC to either of the remaining two options. Go Invest LLC has selected target date funds to meet ERISA requirements and plan documents. The fund selected for the client will be the year that corresponds with their 65<sup>th</sup> birthdate.
2. **Risk Based** – Go Invest LLC will ask the user to complete a risk questionnaire, which provides the data necessary to make a recommendation for the allocation that corresponds with their risk profile. The fund options for risk-based portfolios include income, conservative, moderate, and growth strategies. The allocation will not be executed until the client selects their preferred portfolio.
3. **Custom Portfolio** – The custom portfolio allows the client to select from all available funds on the platform, which have been added based on Go Invest LLC’s investment criteria. This includes equity, bond, sector, risk-based and target date funds.

Auto-rebalancing occurs on a discretionary basis (defined in Item 16) or when directed by a client. However, the client can turn the auto-rebalancing feature off by contacting the firm. Our portfolio manager does not have the authority to override investment model allocations unless an underlying model requires modification. Go Invest LLC personnel oversee the system’s algorithm but do not monitor each client’s account. It remains the client’s responsibility to promptly update their information within our system when there is a material change to their situation and/or investment objective so that they can revise a previous recommendation.

## **Item 5 - Fees and Compensation**

### ***Firm Fees***

Terms of service, payment options, etc., will be stated in the firm’s agreement. Published fees are negotiable at the plan level. Fees are to be paid via automated clearing house (ACH) or withdrawal from plan accounts maintained at the custodian of record. Our firm does not accept checks, cash, money orders or similar forms of payment for its engagements.

Accounts are assessed an annualized asset-based fee of 0.30% (30 basis points) that will be billed monthly in arrears. The first billing cycle will begin once the engagement agreement is executed with our firm and assets have settled into the plan/client account(s) held by the custodian of record. Advisory fees are prorated for partial periods. Fee payments will generally be assessed within the first 10 days of each billing cycle. Deducted fees will also be noted on account statements received from the custodian of record.

By signing our firm's engagement agreement, as well as the selected custodian account opening documents, the plan sponsor/participant will be authorizing the withdrawal of both advisory and transactional fees (described below) from their account. The withdrawal of these fees will be accomplished by the account custodian, and our advisory fees will be remitted directly to our firm. We do not accommodate requests for direct payment in lieu of systematic fee withdrawal.

### ***Additional Fees and Charges***

Certain IRA accounts and retirement plans may necessitate the custodian assess a transactional or service fee (sometimes termed *brokerage fees*), account termination fees, etc., that will be borne by the plan participant and IRA client as stated in the current, separate fee schedule of the service provider. Fees paid by our clients to our firm for our advisory services are separate from any of these fees or other similar charges. In addition, our advisory fees are separate from any internal fees or charges an account holder pays involving mutual funds and exchange-traded funds (ETFs). Additional information about Go Invest LLC fees in relationship to its business practices are found in Item 12 of this document.

### ***External Compensation Involving Securities***

Our firm does not charge or receive a commission or mark-up on securities transactions, nor will the firm be paid a commission on the purchase of a securities holding that is recommended to a client. The firm does not receive "trailer" or SEC Rule 12b-1 fees from an investment company security (i.e., open-ended mutual fund, etc.). Fees charged by such issuers are detailed in prospectuses or product descriptions and interested investors are always encouraged to read these documents before investing. Clients retain the right to purchase recommended or similar investments through a provider of their choice via separate engagement.

### ***Termination of Services***

Go Invest LLC clients have the right to terminate the engagement without fee or penalty within five business days after entering into the agreement. If a client terminates the engagement after this five business-day rescission period, the client is assessed our fee on a prorated basis from the date of last payment to the date of termination. Our firm will return any prepaid, unearned fees within 30 days of the firm's receipt of termination notice.

### **Item 6 - Performance-Based Fees and Side-By-Side Management**

Go Invest LLC advisory fees will not be based upon a share of capital gains or capital appreciation (growth) of any portion of a client's portfolio (also known as performance-based fees). Our compensation will also not be based on side-by-side management, which refers to a firm simultaneously managing accounts that do pay performance-based fees (such as a hedge fund) and those that do not.

## **Item 7 - Types of Clients**

Go Invest LLC primarily serves retirement plan sponsors, in addition to individual and high net worth individual IRA investors. We do not require minimum income, minimum asset levels or other similar preconditions.

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

### ***Methods of Analysis***

We utilize what we believe to be an appropriate blend of fundamental and technical analyses. We evaluate various economic factors including interest rates, the current state of the economy, or the future growth of an industry sector. We then study historical market patterns and trends to assist us in determining the direction of market as well as specific securities. Our research is often drawn from sources such as financial periodicals, reports from economists and other industry professionals, in addition to regulatory filings, such as annual reports, prospectuses, etc.

### ***Investment Strategy***

Our primary investment strategy is based on Modern Portfolio Theory; oriented toward reducing risk by diversifying among an extensive range of asset classes such as domestic and international equities, fixed-income securities, and real estate. Portfolio models constructed under this theory may be tilted to have a greater exposure toward a specific market capitalization,<sup>3</sup> value stocks,<sup>4</sup> or highly profitable stocks in an effort to capture risk premiums historically associated with those asset classes. Portfolios contain widely traded indexed mutual funds and ETFs.

### ***Risk of Loss***

Our firm believes its strategies and investment recommendations are designed to produce the appropriate potential return for the given level of risk; however, there is no guarantee that an investment objective will be achieved. Investing in securities involves risk of loss that clients should be prepared to bear. We have offered examples of such risk in the following paragraphs, and we believe it is important that our clients review and consider each of them prior to investing.

### **Currency Risk**

The risk of loss from fluctuating foreign exchange rates when a portfolio has exposure to foreign currency or in foreign currency traded investments is known as currency risk.

### **Equity (Stock) Risk**

Common stocks are susceptible to general stock market fluctuations and to volatile increases or decreases in value as market confidence in and perceptions of their issuers change. If an investor held common stock or common stock equivalents of any given issuer, they may be exposed to greater risk than if they held preferred stocks and debt obligations of the issuer.

Preferred stocks can be affected by interest rate and liquidity risks (described in adjacent paragraphs), and preferred stock dividend payments are not guaranteed; some are subject to a call provision, meaning the issuer can redeem its preferred shares on demand, and usually when interest rates have fallen.

### Financial Risk

Excessive borrowing to finance a business operation increases profitability risk because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

<sup>3</sup> Market capitalization ("cap") assists investors in understanding the relative size of a company versus another. It aids in measuring the worth of a company in the open market and the market's perception of its future since it reflects what investors may be willing to pay for the company's stock. Examples include:

- **Large-Cap** – Established companies with market values of \$10 billion or more; reputations for producing quality goods and services; history of consistent dividend payments and steady growth.
- **Mid-Cap** – Companies with market values between \$2 billion and \$10 billion; established companies in industries experiencing or expected to experience rapid growth, and increasing market share and/or improving competitiveness.
- **Small-Cap** – Newer companies with market values of \$300 million to \$2 billion; typically serving niche markets or emerging industries. Aggressive risk category investment; may be impacted by economic downturn, vulnerable to competition and uncertainties of their market.

<sup>4</sup> Value investing involves buying above-average positions (holdings) at below-average prices. Conversely, when a holding is considered over-priced, it becomes a candidate to be sold.

<sup>5</sup>

### Fixed Income Risks

Various forms of fixed income instruments may be affected by risk, including:

- **Credit Risk** - The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as ETF share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (e.g., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.
- **Interest Rate Risk** - The risk that the value of the fixed income holding will decrease because of an increase in interest rates.
- **Reinvestment Risk** - With declining interest rates, investors may have to reinvest interest income or principal at a lower rate.

### Fundamental Analysis

The challenges involving fundamental analyses include situations wherein information obtained may be incorrect; the analysis may not provide an accurate estimate of earnings which may be the basis for a security's value. If a security's price adjusts rapidly to new information, a fundamental analysis may result in unfavorable performance.



### *Inflation Risk*

Also called *purchasing power risk*, is the chance that the cash flows from an investment won't be worth as much in the future because of changes in purchasing power due to inflation.

### *Liquidity Risk*

The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (e.g., bonds), there are risks which may occur such as when an issue trading in any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

### *Market Risk*

When the stock market as a whole or an industry as a whole fall in value, it can cause the prices of individual stock prices to fall indiscriminately. This is also called *systemic* or *systematic* risk.

### *Mutual Funds and ETFs*

The risk of owning mutual funds and ETFs reflect their underlying securities (e.g., stocks, bonds, derivatives, real estate, etc.). Certain ETFs and index mutual funds have the potential to be affected by "active risk;" a deviation from its stated index (e.g., S&P 500). Due to the inherent risk involved with leveraged and inverse ETFs, they will not be available within our portfolios.

While many ETFs and index mutual funds are known for their potential tax-efficiency and higher "qualified dividend income" (QDI) percentages, there are asset classes within these investment vehicles or holding periods within that may not benefit. Shorter holding periods, as well as commodities and currencies (that may be a holding within an ETF or mutual fund), may be considered "non-qualified" under certain tax code provisions. A holding's QDI should be considered by the investor when tax-efficiency is an important aspect of the client's portfolio.<sup>2</sup> These forms of securities can carry additional expenses based on their share of operating expenses and certain brokerage fees, which result in duplication of certain fees.

### *Passive Portfolio Management*

A portfolio that employs a passive, "efficient markets" approach (generally representative of index investing) has the potential risk at times to generate lower-than-expected returns.

### *Political Risk*

The risk of financial and market loss because of political decisions or disruptions in a particular country or region and may also be known as "geopolitical risk."

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<sup>2</sup> Tax declarations and calculations are responsibility of plan participants or account beneficiaries. Our firm and its associates are not accountants, an accounting firm or tax attorneys. Plan participants or the account beneficiary should review their personal situation with a tax professional for guidance.

### Research Data

When research and analyses are based on commercially available software, rating services, general market and financial information, or due diligence reviews, a firm is relying on the accuracy and validity of the information or capabilities provided by selected vendors, rating services, market data, and the issuers themselves. While our firm makes efforts to determine the accuracy of the information received, we cannot predict the outcome of events or actions taken or not taken, or the validity of all information researched or provided which may or may not affect the advice regarding or investment management of an account.

### Technical Analysis

The risk of investing based on technical analyses is that it may not consistently predict a future price movement; the current price of a security may reflect all known information. This may occur due to analyst bias or misinterpretation, a sector analysis error, late recognition of a trend, etc.

### **Item 9 - Disciplinary Information**

Neither our firm nor its management has been involved in a material criminal or civil action in a domestic, foreign or military jurisdiction, an administrative enforcement action, or self-regulatory organization proceeding that would reflect poorly upon our firm's advisory business or the integrity of our firm.

### **Item 10 - Other Financial Industry Activities and Affiliations**

Our firm and its management are not registered nor have an application pending to register as a Financial Industry Regulatory Authority (FINRA) or National Futures Association (NFA) member firm or associated person of such a firm. We are not required to be registered with such entities, nor do they supervise our firm, its activities or our associates. Neither the firm nor its management is or has a material relationship with any of the following types of entities:

- accounting firm or accountant
- bank, credit union or thrift institution, or their separately identifiable departments or divisions • lawyer or law firm
- real estate broker, dealer or advisor
- sponsor or syndicator of limited partnerships
- trust company
- an issuer of a security, to include an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)

401GO, an ERISA § 3(16) third-party administrator, is under common control along with Go Invest LLC. 401GO provides internet-based retirement plan recordkeeping and administration services, in addition to compliance and government filing support.

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

### ***Code of Ethics***

Go Invest LLC has adopted a Code of Ethics establishing policies involving the conduct of its personnel, their obligation to comply with applicable laws and regulations, and to act in an ethical and responsible manner involving its advisory services and activities. Such policies include prohibitions against insider trading, and certain political contributions, among others. Our firm periodically reviews and amends its Code of Ethics to ensure they remain current and require all personnel to annually attest to their understanding of and adherence to our Code of Ethics. A copy of the firm's Code of Ethics is made available to any client or prospective client upon request.

### ***Privacy Policy Statement***

Go Invest LLC respects the privacy of all clients and prospective clients (collectively termed "customers" per privacy regulations), both past and present. It is recognized that you have entrusted our firm with non-public personal information and it is important that both access persons and customers are aware of firm policy concerning what may be done with that information.

Our firm collects personal information about customers from the following sources:

- Information customers provide to complete their investment recommendation;
- Information customers provide in engagement agreements and other documents completed in connection with the opening and maintenance of an account;
- Information customers provide verbally; and
- Information received from service providers, such as custodians, about customer transactions.

We do not disclose non-public personal information about our customers to anyone, except in the following circumstances:

- When required to provide services our customers have requested;
- When our customers have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

To ensure security and confidentiality, our firm maintains physical, electronic, and procedural safeguards to protect the privacy of customer information. Within the firm, access to customer information is restricted to personnel that need to know that information. All access persons and service providers understand that everything handled in firm offices are confidential and they are instructed not to discuss customer information with someone else that requests information about an account unless they are specifically authorized in writing by the customer to do so. This includes providing information about a family member's account.

Our firm will provide you with its privacy policy, in advance, if our policy is expected to change.

### ***Firm Recommendations and Conflicts of Interest***

Our associates are prohibited from borrowing from or lending to a client unless the client is a financial lending institution (i.e., bank, credit union, etc.).

Neither our firm nor its associates are authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a “related person” (associates, their immediate family members, etc.) has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

Our firm and its related persons may buy or sell securities that are the same as, similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be different in nature or in timing from a recommendation made to a different client. Clients often have different objectives and risk tolerances. At no time will our firm or any related party receive preferential treatment over our clients. We mitigate this conflict by ensuring that we have policies and procedures in place to ensure that the firm or a related person will not receive preferential treatment over a client. In order to reduce or eliminate certain conflicts of interest involving personal trading (e.g., trading ahead of client recommendations or trades, etc.), firm policy requires that we restrict or prohibit certain related parties’ transactions. Any exceptions must be approved in writing by our Chief Compliance Officer, and personal trading accounts are reviewed on a quarterly or more frequent basis.

### **Item 12 - Brokerage Practices**

#### ***Factors Used to Select Broker/Dealers for Client Transactions***

We require plan accounts to be maintained by a qualified custodian (generally a broker/dealer, futures commission merchant, national bank or trust company) that is frequently reviewed for its capabilities to serve in that capacity by their respective industry regulatory authority. Go Invest LLC is not a custodian, there is not an affiliate that is a custodian, nor does a custodian supervise our firm, its activities or our associates. We do not receive referrals from a custodian, nor are client referrals a factor in our recommendation of a custodian.

Go Invest LLC has entered into an agreement with Matrix Trust Company to serve as custodian. If the client does not want to engage Matrix Trust Company as their provider, we are unable to serve their account. While we recommend Matrix Trust Company as custodian, the client will decide whether to do so and will open their account with them by entering into an account agreement directly with Matrix Trust Company. We do not open the account for a client, but we offer instructions via our website to assist the client in doing so.

Our relationship with Matrix Trust Company and its affiliates provide our firm services that include custody of client assets, trade execution, clearance and settlement, etc. Our firm receives other benefits from Matrix Trust Company that include, either without cost or at a discount:

- receipt of duplicate client statements and confirmations
- research related products and tools
- access to trading desks serving our clients

- access to block trading services
- the ability to have advisory fees deducted directly from a client's accounts (per written agreement)
- resource information related to capital markets and various investments
- access to electronic communications networks for client order entry and account information
- access to certain securities without transaction fees
- marketing, research, technology, and practice management products or services provided to our firm by the noted entities or third-party providers

Some of the noted tools and services made available by our custodian benefit our advisory firm but not directly benefit a client's account. While our firm does not think these services are considered "brokerage or research services" under Section 28(e) of the Securities Exchange Act of 1934, jurisdictions where we serve client accounts believe they fall under this definition. The availability of these services benefits our firm because we do not have to produce or purchase them as long as clients maintain assets in accounts via these providers. A conflict of interest exists since our firm has an incentive to select or recommend a custodian or other provider based on our firm's interest in receiving these benefits rather than our clients' interests in receiving favorable trade execution. It is important to mention that the benefit received by our firm through participation in any provider's program does not depend on the amount of brokerage transactions directed to that custodian. Our selection of custodian is primarily supported by the scope, quality, and cost of services provided as a whole, not just those services that benefit only our advisory firm. Further, we will act in the best interest of our clients regardless of the custodian we may select.

Our firm conducts periodic assessments of any recommended service provider which generally involves a review of the range and quality of services, reasonableness of fees, among other items, in comparison to industry peers.

### ***Best Execution***

"Best execution" means the most favorable terms for a transaction based on all relevant factors, including those listed in the paragraph titled *Factors Used to Select Broker/Dealers for Client Transactions*. We recognize our obligation in seeking best execution for our clients; however, it is our belief that the determinative factor is not always the lowest possible cost but whether the selected custodian's transactions represent the best "qualitative execution" while taking into consideration the full range of services provided. Our firm will seek services involving competitive rates, but it may not necessarily correlate into the lowest possible rate for each transaction. We have determined having our portfolio management clients' accounts trades completed through Matrix Trust Company is consistent with our obligation to seek best execution of client trades. A review is regularly conducted with regard to recommending a custodian to our clients in light of our duty to seek best execution.

### ***Directed Brokerage***

Not all investment advisors require their clients to direct brokerage. Our operational relationship with Matrix Trust Company requires client accounts custodied with them to have trades executed per their order routing requirements. We do not direct Matrix Trust Company which executing broker should be selected for trade execution; whether that is an affiliate of Matrix Trust Company or another executing broker of their choice. As a result, a client may pay higher commissions or other transaction costs,

experience greater spreads, or receive less favorable net prices on transactions than might otherwise be the case. In addition, since we require Matrix Trust Company as custodian for our clients, there is an inherent conflict of interest involving our recommendation since our advisory firm receives various services described in other parts of this section from Matrix Trust Company. Note that we are not compensated for trade routing/order flow, nor are we paid commissions on such trades. We do not receive interest on our client accounts' cash balances.

Our clients are also unable to engage in direct brokerage via our custodian. As a result, they may pay higher commissions or other transaction costs, potentially experience greater spreads, or receive less favorable net prices on transactions for their account than would otherwise be the case if they had the opportunity to direct brokerage.

### ***Aggregating Securities Transactions***

Trade aggregation involves the purchase or sale of the same security for several clients/accounts at approximately the same time. This may also be termed "blocked," "bunched" or "batched" orders. Aggregated orders are effected in an attempt to obtain better execution, negotiate favorable transaction rates, or to allocate equitably among multiple client accounts should there be differences in prices, brokerage commissions or other transactional costs that might otherwise be unobtainable through separately placed orders. Transaction charges and/or prices vary due to account size and/or method of receipt.

To the extent that we are able to aggregate client orders for the purchase or sale of securities, including securities in which a related person may invest, we will generally do so in accordance with the parameters set forth in SEC No Action Letter, *SMC Capital, Inc.* A copy of the referenced No-Action Letter is available to interested parties on the SEC's website.

When trade aggregation is not allowed or infeasible and necessitates separate transactions (e.g., withdrawal or liquidation requests, odd-lot trades, etc.), an account may experience less favorable prices than those where aggregation has occurred.

Our compliance staff review trading processes on a periodic basis to ensure they remain within stated policies and regulation. We will announce in advance via this section of Form ADV Part 2A if our trading practices change at a point in the future.

### **Item 13 - Review of Accounts**

Our firm's advice is rendered through its online delivery solution and is designed to be operated by the plan participants, who have unlimited access to employ the system's functionality and can review their account, portfolio allocation, etc., and update information as necessary. Reviews by our supervisory staff as well as the investment manager occur when triggered by material market, economic or political events.

Performance reports are available when accessed via our web-based interface, and account holders have unlimited access to the system as long as their account remains open with our firm. This access also provides the account holder the ability to generate various reports to gauge their account progress. Our online performance reports are calculated using time-weighted methodologies that are

programmed into our portfolio administration systems which are periodically back-tested by supervisory staff and/or qualified third-parties to ensure accuracy. Our reporting system compounds daily portfolio-level returns from the period the account had been originally funded until the present time. Reports are intended to inform plan participants about investment performance on both an absolute basis and as compared to a well-known benchmark. We believe these are appropriate methods to evaluate portfolio performance since not all are sensitive to the account's contributions or withdrawals. Account holders are urged to carefully review and compare statements that they have received that were prepared by their custodian of record with any performance report received from our firm's systems.

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

Please refer to Items 10 and 12 for information with respect to our offerings/services and the conflicts of interest they present. If a prospective client is introduced to our firm by an unaffiliated solicitor, our firm may pay that solicitor a referral fee. In the event a fee is paid, the terms of the arrangement, including the fee, will be disclosed to the prospective client prior to their execution of the investment management agreement in accordance with applicable law.

#### **Item 15 - Custody**

Plan assets will be maintained in accounts held at the custodian of record. Assets are not physically maintained by our advisory firm or by any related person of our advisory firm. In keeping with this policy involving client funds or securities, we:

- Restrict the firm or an associate from serving as trustee or having general power of attorney over a client account;
- Prohibit an associate from having authority to directly withdraw securities or cash assets from a client account. Advisory fees will only be withdrawn from an investment account through the engagement of a qualified custodian maintaining account assets and with prior consent (see Item 5);
- Do not accept or forward client securities (i.e., stock certificates) erroneously delivered to our advisory firm; and
- Will not collect advance fees of \$1,200 or more for services that are to be performed six months or more into the future.

Account holders are provided transaction confirmations and summary account statements on at least a quarterly basis. Go Invest LLC does not create an account statement for its clients nor serve as the sole recipient of client account statements. Account holders are reminded to review and compare their account statements that they receive from their custodian of record with any performance report they receive from any source.

#### **Item 16 - Investment Discretion**

Rebalancing of portfolios occur via our system on a discretionary basis or when directed by the plan participant to do so by a change to their allocation. Via limited power of attorney, discretion grants our firm via its platform the authority to implement investment decisions, such as the purchase or sale of a security on behalf of accounts, without requiring ongoing account holder pre-authorization for each transaction in order to meet stated investment objectives. This authority is provided via the execution of

our agreement and the account custodian's documents. Note that the custodian specifically limits our investment authority within an account to the placement of trade orders and our request for the deduction of our advisory fee.

A plan participant has the ability to turn off the auto-rebalancing feature by contacting Go Invest, which then requires their account to be served on a nondiscretionary basis. When an account is served on a nondiscretionary basis, the account holder is required to provide ongoing prior approval involving the investment and reinvestment of account assets, including portfolio rebalancing. The account holder must be alerted for and act upon, at their own discretion and risk, allocation/trading notifications. Nondiscretionary accounts are typically unable to be aggregated (see Item 12); increasing the likelihood of being assessed higher trading fees or receiving less favorable prices for their securities than those accounts where trade aggregation has occurred.

It remains each account holder's responsibility to promptly update their information within our system when there is a material change to their situation and/or investment objective for the purpose of revising a previous recommendation/allocation.

#### **Item 17 - Voting Client Securities**

Investment account holders of record periodically receive "proxies" or other similar solicitations sent directly from the custodian of record or transfer agent. Our advisory firm does not forward duplicate copies that we receive of these or other correspondence relating to the voting of securities, class action litigation, or other corporate actions.

Our firm does not vote proxies on behalf of our clients, nor do we offer specific guidance on how to vote proxies, including accounts served on a discretionary basis. While our educational materials provide general information about proxies and other similar matters, we do not provide specific guidance involving any claim or potential claim in any bankruptcy proceeding, class action securities litigation or other litigation or proceeding relating to securities held at any time in an account, including, without limitation, to file proofs of claim or other documents related to such proceeding, or to investigate, initiate, supervise or monitor class action or other litigation involving client assets.

The account holder of record maintains exclusive responsibility for directing the manner in which proxies solicited by issuers of securities that they beneficially own shall be voted, as well as making all other elections relative to mergers, acquisitions, tender offers or other legal matters or events pertaining to a client's holdings. The account holder of record should consider contacting the issuer or their legal counsel involving specific questions they may have with respect to a particular proxy solicitation or corporate action.

#### **Item 18 - Financial Information**

Go Invest LLC does not take physical custody of its client accounts.

We do not require or solicit prepayment of more than \$1,200 in advisory fees per client for services that are to be performed six months or more in advance.



Neither our firm nor any member of its management serves as general partner for a partnership or trustee for a trust in which the firm's advisory clients are either partners of the partnership or beneficiaries of the trust.

The firm and its management do not have a financial condition likely to impair the ability to meet their commitment to advisory firm clients, nor has the firm and its management been the subject of a bankruptcy petition.

Due to the nature of our advisory services, an audited balance sheet is not required nor included in this disclosure.