

Midas

A Registered Investment Advisor

709 Westward Dr.

Verona, WI 53593

<http://midas.gold>

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Phone: (608) 212-0056

July 23, 2015

Registration does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Midas. If you have any questions about the contents of this brochure, please contact us at John@vcn.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about [Midas](#) is available on the SEC's website at www.adviserinfo.sec.gov

2. Material Changes

This is the first version of this brochure we have published.

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See Part 2B, attached, for additional information about your Financial Advisor(s)

4. ADVISORY BUSINESS

A. Our Company & Principals Midas is a federally registered investment adviser providing investment advice through an interactive website, registered with the Securities and Exchange Commission since 2015. Mr. John Wiltbank is currently the owner and President.

B. Type of Services we offer. At Midas we offer investment supervisory services primarily on a non-discretionary basis, although a Portfolio Investment Management (PIM) account can be established for you if you desire or need discretionary management. We help you develop and implement a plan to protect your savings in different economic environments, and achieve your financial goals. (see 5A below.)

C. Customization of Accounts & Restrictions on Investments Via an automated online evaluation of your financial situation and objectives, we will work with you to identify your risk tolerance and present the various investment products that we believe will help you obtain your investment goal(s).

D. Wrap Fee Programs We offer asset management through a wrap fee program. Currently that wrap fee is zero. The assets in your wrap program account may be exclusively invested in Mutual Funds, equities, ETF's (Exchange-traded funds) or any combination of those, or other investments that are allowed in the wrap program, which will depends upon the program selected by you. When you participate in a wrap program, your net fees generally include management fees, performance reporting, and transaction fees and may also include custody fees. Non-wrap programs charge these fees separately, and the net cost of a non-wrap program could be higher or lower than the cost of the combined services you receive under a wrap program. Additionally, Midas will share in a portion of the management fees that are charged to you.

E. Client Assets Managed by Us. As of July 23, 2015 our non-discretionary assets under management totaled \$0.00

5. FEES AND COMPENSATION

A. Compensation Our fees are calculated based upon your assets (i.e. the total value of securities, money market funds and cash) under management. The following are programs we offer, and fees you will pay. Your fees will include investment management, which includes portfolio monitoring and reporting, clearance, and purchase and sales transaction costs. Fees will not include things such as transaction fees (e.g. wires and transfers) other charges (e.g. FedEx.) Commissions and other fees will be charged on assets held outside of your wrap account (see “C” below.) Fees for accounts may be adjusted for multiple accounts. You should refer to the fee schedule noted in your contract to confirm the schedule applicable to your account.

Fees are negotiable.

Allocation Advisor Program Fees

Portfolios: Gold, Bitcoin, and Preferred:
Minimum Account Size is \$2,000 (unless waived)
Eligible Assets Annualized Fee
First \$250,000 0.00%
Next \$750,000 0.00%
Over \$1,000,000 0.00%

B. Deduction of our fees. You will pay fees for your account on a monthly basis, unless we agree otherwise. The fees are calculated and billed based upon the date the account agreement is accepted, based upon the initial value of the account, and covers the remainder of the calendar month. Client agreements allow the Clearing Agent to deduct fees on a quarterly basis, in advance, according to the fee schedule in your contract, unless you have made other arrangements.

C. Other Fees and Expenses In addition to the management fees described above in “A”, your account may incur the following charges: Custody, transfer fees, wire fees, priority mail or postage, mutual fund fees (management & administrative), brokerage fees and commissions, markups/down (if not in a wrap program) and margin interest (if margin account.) See Item 12 for additional information about these fees.

D. Payment of Fees In advance. Fees are charged in advance. If for any reason you decide to terminate your account, we require a written five (5) day advance notice to terminate your account. Upon receipt of your written termination notice we will pro-rate the fees charged in your account for the actual days managed and refund any unearned fees to you. Some accounts may also be charged a small start up fee.

E. Other compensation we may receive In addition to our receipt of advisory fees, we also receive additional compensation from the activity in your account in the form of marketing service fees for mutual funds (i.e. 12b-1 fees) purchased in

your account. In the event your account is a qualified ERISA account, those fees will be credited to the Plan. Our advisors may also receive compensation for transactions (brokerage fees/commissions) executed in your account IF those assets are held outside of one of the wrap accounts described above. If we are managing a Network account on your behalf we may recommend both load and no-load mutual funds. In the event these funds are recommended, we may receive sales compensation via their execution through our affiliated broker dealer. Receipt of these forms of additional compensation may be a conflict of interest in that it could be an incentive for your portfolio manager to recommend products for your account based upon the amount of additional compensation they receive. We will supervise your account to assure that any recommendations made are in accordance with your investment objectives and goals. On occasion you may receive communications from us to confirm that the activity in your account is in accordance with your instructions and that you are aware of the additional compensation being paid. We do not reduce our advisory fees in ratio to our other compensation received from commissions and/or markups or markdowns. You are not required to direct the transactions in your account to our affiliate; you may direct the transactions in your account through a broker/dealer of your choice.” For additional information please see Item 14, “Client Referrals and Other Compensation.”

6. PERFORMANCE BASED FEES and SIDE-BY-SIDE

MANAGEMENT Midas does not manage accounts for a performance based fee, or share of capital gains.

7. TYPES OF CLIENTS We manage assets for the following types of clients; individuals, charitable organizations, and corporations. We do not have any special fees or requirements for our accounts in addition to the fee schedule or minimum account size noted in item 5, above.

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES and RISK OF LOSS

We may use various methods to assist us in managing your account, including long and short term trading, the use of margin and options. We use several methods of analysis to help us manage your account. We primarily use fundamental asset analysis, which is when we are looking at the core nature and characteristics of an asset, and how it will behave under different economic environments. We may also include monetary and political policy analysis. In our opinion, there is no method or combination of methods of evaluating a stock that is fool proof, and no method that can reliably beat the market return generally available. In spite of the best analysis and strategies, a stock or other asset can move in the wrong direction, resulting in a loss of your investment.

9. DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that might be material to your evaluation of us, our integrity or that you might find important in your evaluation of us. Neither Midas nor any of its managing principals have any events or disclosure to make.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS

A. Pending and Current Registrations with broker/dealers. All of our employees and management personnel are registered as investment advisors. None of our employees nor management personnel are registered with a broker dealer. We do not allow our employees to register with an outside firm.

B. Registrations or applications of our Firm or associated person(s) with futures commission, or commodity pool operators. We are not registered with the Commodities and Futures Trading Commission.

C. Material Relationships and Conflicts of Interest

We do not pay a referral fee or share investment adviser fees with anyone who is not registered as an investment adviser. At the present time we have no current arrangements in effect

D. Recommendation and selection of other investment advisers for your account(s.)

We do not recommend other investment advisers.

11. OUR CODE OF ETHICS

Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

Our Code of Ethics covers our Firm's policies with regard to the conduct of the employees of our Firm. It requires their compliance with regulations, fiduciary duties and standards of conduct. It addresses areas such as their obligations to you, our client(s), personal securities transactions, trading and holdings, our review of the activity of access persons, and privacy and non-public information. If you would like a copy of this document please request it from the contact person shown on the top of this brochure.

B. Personal Trading

Although our Firm allows employees to trade in the same securities as for your account, at no time may they receive a better price than you receive for your account, nor may they trade for their own accounts in amounts that could affect the price of a security. Their personal trading is closely monitored to assure that they are placing your interest ahead of their own.

12. BROKERAGE PRACTICES

A. Factors in recommending or selecting brokers to execute trades

1. Research or Soft Dollar Benefits We do not receive research or soft dollar benefits for the execution of trades in your accounts.
2. Brokerage for Client Referrals. In our selection or recommendation of broker/dealers for your account we do not consider any referrals from any broker/dealer or third parties.

B. Aggregation of Trades We aggregate trades whenever possible, as aggregated trades normally result in the best execution.

13. REVIEW OF ACCOUNTS

On a monthly basis you will receive a written report that will show your investments, your rate of return and profits/losses on your position. This will be compared to the indices that best represent your stated investment objective. Your financial advisor will review this material and be available to discuss it with you if you have any questions.

14. CLIENT REFERRALS and OTHER COMPENSATION

Neither our Firm nor Financial Advisors receive any items of value, in the form of prizes, awards or items of economic benefit from non-clients. Midas may provide investment advisory services for accounts held at banks providing fiduciary or trust services. We will receive a fee based upon the value of assets held in the account(s).

15. CUSTODY

The qualified custodian for your account is The Charles Schwab Corporation. They may be sending you periodic account statements. Our Firm will send you monthly statements of your activities and your performance; you should compare our statements to the custodians' statements and report any error immediately, preferably in writing to us, as well as the custodian.

16. INVESTMENT DISCRETION

Our accounts are supervisory, generally not on a discretionary basis. Our discretion must be granted to us by you in writing. If you have limitations on the type of investments we have discretion for, you must provide us those instructions in writing. If you would like us to make withdrawals or payments from your account, that must also be authorized in writing.

17. VOTING CLIENT SECURITIES

We do not vote proxies on behalf of our clients. If you would like a copy of the proxy voting policies please ask your advisor. If you decide to retain the right to vote proxies you must provide written notice and will receive all proxies from your custodian, directly from the company, or the transfer agent. You may elect to receive these electronically as well. If you wish to discuss the matters contained in a proxy please call your financial adviser.

18. FINANCIAL INFORMATION

A. Custody We do not have custody of your assets or cash. We do however collect management fees in advance and deduct them from your account with your written permission. (See item 5D, above.)

B. Our Financial Condition We do not have any financial condition that could reasonably be expected to impair our financial commitment to our clients.

Part 2B of Form ADV:
1. Brochure Supplement

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This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact John Wiltbank (see above.)

This brochure supplement provides information about the following Financial Advisers:

John Wiltbank

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Additional information about **Midas** or your adviser is available on the SEC's website at www.adviserinfo.sec.gov

John Wiltbank

2. Educational Background and Business Experience

Mr. Wiltbank is the owner and founder of Midas, which he founded in 2015. He briefly attended Brigham Young University, but did not graduate. Born in 1981, he passed his first exam in the securities industry in 2015, the Series 65 exam, qualifying him as an investment advisor.

3. Item Disciplinary Information

Mr. Wiltbank has no reportable disciplinary events.

4. Other Business Activities

Mr. Wiltbank is a self-employed product developer, which takes approximately 160 hours of his time each month

5. Additional Compensation

Mr. Wiltbank does not receive any additional bonuses based upon his sales, referrals or new accounts.

6. Supervision

Activity in accounts managed by Mr. Wiltbank may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Mr. Wiltbank himself performs those reviews; he may be reached at 608-212-0056.