

Item 1: Cover Page

Midwest Heritage Financial Advisors
(A Separately Identifiable Department of Midwest Heritage Bank, FSB)
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Telephone: 515-246-8378
website: N/A

IARD/CRD Number: 306308

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This brochure provides information about the qualifications and business practices of Midwest Heritage Financial Advisors. If you have any questions about the contents of this brochure, please contact us at 515-246-8378 or mwatters@mhbank.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.

Midwest Heritage Financial Advisors is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Midwest Heritage Financial Advisors is also available on the SEC's website at www.adviserinfo.sec.gov. Midwest Heritage Financial Advisors' CRD number is 306308.

Item 2: Summary of Material Changes

There have been no material changes since the November 10, 2020 Form ADV filed on the IARD system.

Item 3: Table of Contents

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

ITEM 4 – ADVISORY BUSINESS

Midwest Heritage Bank, FSB dba Midwest Heritage Financial Advisors (“We”, “Us”, or “Midwest Heritage”) is registered as an investment adviser. Midwest Heritage Bank, FSB is the sole owner of Midwest Heritage Financial Advisors, which is a division of Midwest Heritage Bank, FSB. We provide investment advice to individuals, trusts, estates, charitable organizations, corporations and other business entities. We also provide advice to clients on financial planning, estate planning, tax planning which may include mortgages, automobiles, 529 plans, and other similar financial matters. Advice may be provided on matters that include, but are not limited to, life insurance, property and casualty insurance, and long-term care insurance. Midwest Heritage is a fiduciary and is required to act in a client’s best interest at all times. Midwest Heritage has an alternative office to meet with clients at 1025 Braden, Avenue, Chariton, Iowa 50049.

Investment Management

We use a time-tested, disciplined approach to investing. We are a “total portfolio” manager using an active, diversified investment approach. We believe that a portfolio should be diversified, and excess returns can be achieved by overweighting undervalued asset classes and investment styles. Typically, we tailor our portfolios to the individual needs of our clients by evaluating the client’s investment guidelines and objectives which we use to guide us in making investment decisions for each client. If you desire, you may impose restrictions on the securities or types of securities you would like us to invest in.

Financial Planning

Sound financial planning services can help clients identify the strengths and weaknesses of their long-term financial health. We have years of experience in this area and sophisticated software tools available to assist our clients in developing comprehensive financial plans that guide them toward the accomplishment of their goals.

Retirement Planning

Retirement planning and financial planning are not one and the same. We have worked with many clients through their earning years and into the distribution phase of their lives. We assist clients with the management of their portfolios to ensure longevity through retirement while at the same time providing needed income. We have experience working with clients on a range of retirement planning issues, including rollover of 401(k) plans, level of income needed for retirement and tax-efficient distribution of after-tax and before-tax assets.

Tax Planning

Whether it’s the sale of a security, the exercise of a stock option, the transfer of real estate or the gifting of appreciated securities, advanced planning regarding the tax impact of a transaction is critical. Our team has many years of experience in assisting clients with tax issues. Our goal is to help our clients minimize their lifetime tax liability so they can hold onto the hard-earned dollars they work their entire careers to amass.

Assets under Management

As of September 30, 2020, we were actively managing \$100,240,805 of clients' assets on a discretionary basis.

ITEM 5 – FEES AND COMPENSATION

We offer our services on a fee basis, which may include hourly and assets under management

fees. Additionally, certain of our employees, in their individual capacities, may offer securities brokerage services and insurance products under a commission arrangement. We reserve the right, in our sole discretion, to negotiate, reduce or waive the advisory fee for certain client accounts and for any period of time as determined by us.

Advice offered may involve investments in mutual funds. Clients are hereby advised that all fees paid for asset management services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees are described in each mutual fund's prospectus. Clients whose assets are invested in the shares of mutual funds pay with a direct management fee to the investment adviser and an indirect management fee to the mutual fund.

Financial Planning Services Fees

We may charge an hourly fee for financial planning services. These fees are negotiable, depending upon the level and scope of the services and the professional rendering the financial planning services. The fees generally range from \$100 to \$300 per hour.

Prior to engaging us to provide financial planning consulting services, the client and firm are required to enter into a written agreement setting forth the terms and conditions of the engagement, including the amount of the fee. The balance is generally due upon delivery of the financial plan or completion of the agreed upon services as financial plans are typically completed within six months. We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

The agreement for financial planning services terminates upon delivery of the analysis or review. Upon termination, any prepaid, unearned fees will be returned to the client, based upon the time and effort completed prior to termination of the agreement. Any fees owed to the firm upon termination will be billed to the client at that time. No refunds will be made after delivery of the services. The client will receive full disclosure and details of all arrangements in the agreement.

Fixed Fees

The Adviser also offers a flat fee program for certain clients that they buy/sell only equities.

Investment Management Fee for Individual Investors

We provide investment management services for an annual fee based upon a percentage of the market value of the assets being managed. Our annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. We do not, however, receive any portion of these commissions, fees, and costs. Our annual fee is prorated and charged monthly, in arrears, based on the average daily balance from the previous month. The annual fee is negotiable and varies between 0.00% and 1.50%. The client will receive full disclosure and details of all arrangements in the agreement.

Although the Adviser believes its management fee is competitive, clients may be able to find similar services at higher or lower costs. Also, there can be no assurance that transactions effected through us result in the lowest per transaction cost possible to a client.

Fees payable to the Adviser for investment management services are, with the client's prior permission, automatically deducted from the client's account when due. The client will receive an invoice from the Adviser, as well as reports from the account's custodian, showing the fee calculation and fee amounts debited. The Adviser will liquidate money market shares to pay the fee and, if money market shares or cash value are not available, other investments will be liquidated. Authorization for the

deduction of fees from the managed account is contained in the Agreement. The client may terminate the authorization for automatic deduction at any time by notifying the Adviser in writing.

In the event of trading errors caused by the Adviser employees, it is the Adviser's policy to make its clients whole and to document errors in its trade error file. Any Adviser created trade errors that result in a net credit will be donated to a charity of Adviser's choice or, if not selected, then a charity of TD Ameritrade Inc.'s ("TD Ameritrade") choice. Any Adviser created trade errors that result in a net debit to client accounts will be debited against Firm's TD Ameritrade Error Account and the client made whole.

Investment Management Fee for Institutional Investors

We also provide investment management services to institutional investors, primarily foundations, non-profit organizations, pension and qualified plans, for an annual fee based upon a percentage of the market value of the assets being managed by us. Our annual fee is exclusive of, and in addition to brokerage commissions, transaction fees, and other related costs and expenses which are incurred by the client. We do not receive any portion of these commissions, fees, and costs. This annual fee is prorated and charged monthly, in arrears, based on the average daily balance from the previous month. The annual fee is negotiable and varies between 0.00% and 1.50%. The client will receive full disclosure and details of all arrangements in the agreement.

Fees for Management during Partial Periods of Service

For the initial period of investment management services, the fees are calculated on a pro rata basis. The Agreement will continue in effect until terminated by either party pursuant to the terms of the Agreement. Our fees are prorated through the date of termination and any remaining balance is charged or refunded to the client, as appropriate. If assets are deposited into or withdrawn from an account after the inception of a month, the fee payable with respect to such assets will be adjusted or prorated based on the number of days remaining in the month.

Commissions or Sales Charges for Recommendations of Securities

Clients can engage certain persons associated with the firm (but not the firm itself) to render securities brokerage services under a commission arrangement. Clients are under no obligation to engage such persons and may choose brokers or agents not affiliated with this firm. Under this arrangement, clients may implement securities transactions through certain of our employees in their respective individual capacities as Registered Representatives of Securities America, an SEC registered broker-dealer and member of FINRA. Securities America may charge brokerage commissions to effect these securities transactions and thereafter, a portion of these commissions may be paid by Securities America to such employees. Prior to effecting any transactions clients are required to enter into a new account agreement with Securities America. The brokerage commissions charged by Securities America may be higher or lower than those charged by other broker-dealers. We do not charge an advisory fee on the same assets for which our certain employees receive commissions.

First and foremost, our objective as a firm is to place nothing before the best interests of our clients. However, a conflict of interest exists to the extent that certain employees can recommend the purchase of securities where they receive commissions or other additional compensation as a result. The receipt of commissions provides an incentive for our certain employees to recommend investment products based on compensation they will receive from selling such products, rather than on the client's needs.

We take the following steps to mitigate the possibility that our certain employees will recommend an investment product based on potential commission rather than on the client's needs: we address the inherent conflicts as noted in the paragraph above, by disclosing them to

you in this Brochure and disclosure is made to the client at the time a brokerage account is opened through Securities America, identifying the nature of the transaction or relationship, the role to be played by Securities America and our certain employees, individually, and any compensation (e.g. commissions) to be paid by the client.

We use TD Ameritrade as our primary custodian. Through our use of custodial services, you may incur certain trading costs in addition to our fees which are further explained below in Item 12.

ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge performance-based fees nor do we engage in side-by-side management.

ITEM 7 – TYPES OF CLIENTS

We provide investment advice to individuals, trusts, estates, charitable organizations, corporations, and other business entities.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

We determine the investment strategies to follow when managing client accounts. The following provides information regarding the methods of analysis and investment strategies that may be used by our advisory representatives.

Methods of Analysis

Fundamental analysis involves the fundamental financial condition and competitive position of a company. We will analyze the financial condition, capabilities of management, earnings, new products and services, as well as the company's markets and position amongst its competitors in order to determine the recommendations made to clients. The primary risk in using fundamental analysis is that while the overall health and position of a company may be good, market conditions may negatively impact the security.

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

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

Investment Strategies

Our philosophy represents an evolution of investment thought that moves beyond simple "Buy and Hold" and basic Asset Allocation to that of Strategy Diversification. It focuses more directly on how investments interact and relate to each other, looking closely at how investments are managed, how they seek to gain their returns, how they address risk exposures, and perhaps most importantly, what their correlations are to one another.

We believe that Strategy Diversification can more effectively address portfolio volatility than basic Asset Allocation across stock and bond asset classes by utilizing strategies with defensive mechanisms, and low or uncorrelated strategies that have return characteristics unrelated to the stock and bond markets. Strategy Diversification is designed to recognize that investments have different characteristics to achieve return and address risk. By diversifying and actively allocating across

these various strategies, we strive to build portfolios to address each client's long-term financial plan with more consistent returns and lower portfolio volatility.

Risk of Loss

Mutual Funds and Exchange Traded Funds (ETFs)

An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Shares of mutual funds are generally distributed and redeemed on an ongoing basis by the fund itself or a broker acting on its behalf. The trading price at which a share is transacted is equal to a fund's stated daily per share net asset value ("NAV"). The per-share NAV of a mutual fund is calculated at the end of each business day, although the actual NAV fluctuates with intraday changes to the market value of the fund's holdings. The trading prices of a mutual fund's shares may differ significantly from the NAV during periods of market volatility, which may, among other factors, lead to the mutual fund's shares trading at a premium or discount to NAV.

Shares of ETFs are listed on securities exchanges and transacted at negotiated prices in the secondary market. Generally, ETF shares trade at or near their most recent NAV, which is generally calculated at least once daily for indexed-based ETFs and more frequently for actively managed ETFs. However, certain inefficiencies may cause the shares to trade at a premium or discount to their pro rata NAV. There is also no guarantee that an active secondary market for such shares will develop or continue to exist. Generally, an ETF only redeems shares when aggregated as creation units (usually 50,000 shares or more). Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to dispose of such shares.

Market Risks

The profitability of a significant portion of our recommendations or selections may depend to a great extent upon correctly assessing the future course of price movements of various securities in which it invests. There can be no assurance that we will be able to predict those price movements accurately.

Management through Similarly Managed Accounts

For most clients, we generally manage portfolios by allocating portfolio assets among various mutual funds/ securities on a discretionary basis using one or more of its proprietary investment strategies (collectively referred to as "investment strategy"). In so doing, we buy, sell, exchange and/or transfer shares of mutual funds, ETFs and other securities based upon the investment strategy.

Our management using the investment strategy complies with the requirements of Rule 3a-4 of the Investment Company Act of 1940, as amended. Rule 3a-4 provides similarly managed accounts, such as the investment strategy, with a safe harbor from the definition of an investment company.

The investment strategy may involve an above-average portfolio turnover that could negatively impact the net after-tax gain experienced by an individual client. Securities in the investment strategy are usually exchanged and/or transferred without regard to a client's individual tax ramifications. Certain investment opportunities that become available to clients may be limited. As further discussed in response to Item 12B (below), we allocate investment opportunities among clients on a fair and equitable basis.

Options

Options allow investors to buy or sell a security at a contracted “strike” price (not necessarily the current market price) at or within a specific period of time. Clients may pay or collect a premium for buying or selling an option. Investors transact in options to either hedge (limit) losses in an attempt to reduce risk or to speculate on the performance of the underlying securities. Options transactions contain a number of inherent risks, including the partial or total loss of principal in the event that the value of the underlying security or index does not increase/decrease to the level of the respective strike price. Holders of options contracts are also subject to default by the option writer which may be unwilling or unable to perform its contractual obligations.

Structured Notes

A structured note is a debt security issued by financial institutions, the return of which, is linked to the performance of an underlying asset, group of assets, or index. Structured notes may be used to reduce risk exposure in a client’s portfolio based on current market trends.

General Risk of Loss

Investing in securities involves the risk of loss. Clients should be prepared to bear such loss. This is not intended to be an all inclusive list. Each client should review the mutual fund prospectus for the specific risks related to each fund that is held in the client’s account.

ITEM 9 – DISCIPLINARY INFORMATION

We, nor anyone on our management team, have been, or is currently, subject to any criminal, civil or disciplinary action.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Receipt of Securities Commission

We participate in Securities America hybrid RIA program. As such, certain employees are also Registered Representatives of Securities America. In such capacity, certain employees receive commissions for recommending the purchase or sale of securities. As a result of this relationship, Securities America has access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about our clients, even if the client does not establish any account through Securities America. Any client who would like a copy of the Securities America privacy policy may contact us. Please see Item 5 for a discussion of the conflicts.

Receipt of Insurance Commission

Certain of the firm’s advisory representatives, in their individual capacities, are also licensed insurance agents with various insurance companies, and in such capacity, may recommend, on a fully-disclosed commission basis, the purchase of certain insurance products. We permit the advisory representatives certain employees, in their individual capacities as licensed insurance agents, to sell insurance products to our investment advisory clients. A conflict of interest exists to the extent that the advisory representatives recommend the purchase of insurance products and receive insurance commissions or other additional compensation.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Our employees may buy and sell securities that they recommend to advisory clients for purchase and sale. To the extent possible, the firm and its employees will process securities transactions for client accounts ahead of similar transactions contemplated for their own accounts. The Adviser and its employees do not recommend to clients or buy or sell for clients’ accounts investments in which the

Adviser or its employees have a material financial interest. To ensure employee transactions are supervised, we have established a Code of Ethics designed to prevent conflicts of interest. Under the requirements of the Code, each Adviser employee is required to file personal transaction reports regularly for transactions in accounts in which they have a beneficial interest. In addition, certain types of transactions for employee personal accounts require preapproval and certain types of transactions are prohibited. A complete copy of our Code of Ethics is available upon request.

ITEM 12 – BROKERAGE PRACTICES

We do not maintain physical custody of the assets we manage on your behalf. Your assets must be maintained in an account at a “qualified custodian,” generally defined as a broker-dealer or bank. At the current time we require clients to select and direct either Securities America or TD Ameritrade as the sole and exclusive broker/dealer and custodian to execute transactions for investment management accounts. All investment management transactions will be processed without commissions. While we believe that these custodians have execution procedures that are designed to obtain the best execution possible, there can be no assurance that best execution will be obtained. Clients should understand that not all advisors require their clients to direct brokerage to a specific firm. By directing brokerage to Securities America and TD Ameritrade, clients may be unable to achieve the most favorable execution for client transactions. Therefore, directed brokerage may cost clients more money.

The Adviser participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC, an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. The Adviser receives some benefits from TD Ameritrade through its participation in the program.

When placing orders for more than one client account, the Adviser portfolio manager may decide to aggregate similar purchase or sale orders in the same security for several accounts resulting in an average price being applied to each client account participating in the aggregate order.

The Adviser representatives will not generally exercise discretion to evaluate the commissions and services of other broker-dealers unless unusual conditions exist. Selection of one broker-dealer for executing orders may not allow the Adviser to receive research from other broker-dealers in return for commission business, to batch transaction orders with those of other clients for volume commission discounts (unless batched with orders of other the Adviser clients) or allow the Adviser to evaluate the quality of execution services and commissions of other broker-dealers. Thus, selecting a single broker-dealer may not result in best price or execution of a client's transactions.

As disclosed above, the Adviser participates in TD Ameritrade’s institutional customer program and the Adviser may require clients to maintain accounts with TD Ameritrade for custody and brokerage services. There is no direct link between the Adviser’s participation in the program and the investment advice it gives to its clients, although the Adviser receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk servicing advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have

advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Adviser by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Adviser's related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for the Adviser's personnel to attend conferences or meetings generally relating to the program or to TD Ameritrade's advisor custody and brokerage services. Some of the products and services made available by TD Ameritrade through the program may benefit the Adviser but may not benefit its client accounts. These products or services may assist the Adviser in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Adviser manage and further develop its business enterprise. The benefits received by the Adviser through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by the Adviser or its related persons in and of itself creates a conflict of interest and may influence the Adviser's recommendation of TD Ameritrade for custody and brokerage services.

Factors which we consider in recommending Securities America or any other broker-dealer to clients include their respective financial strength, reputation, execution, pricing, research and service. The commissions and/or transaction fees charged by Securities America and TD Ameritrade may be higher or lower than those charged by other financial institutions.

We receive support services and/or products from Securities America and TD Ameritrade, many of which assist us to better monitor and service accounts. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related programs and publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- transition assistance for new advisory representatives
- electronic communication network
- duplicate client confirmations and statements
- computer hardware and/or software
- other products and services used by us in the furtherance of its investment advisory business

These support services noted above are provided to the firm based on the overall relationship between our firm and Securities America and TD Ameritrade. It is not the result of soft dollar arrangements or any other express arrangements that involves the execution of client transactions as a condition to the receipt of services. We will continue to receive the above services regardless of the volume of client transaction executed with Securities America and TD Ameritrade. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by our firm to Securities America and TD Ameritrade or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the above.

The commissions paid by brokerage clients comply with our duty to obtain “best execution.” Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where we determine that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a financial institution’s services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. We seek competitive rates but may not necessarily obtain the lowest possible commission rates for client transactions.

We periodically and systematically review our policies and procedures regarding the recommendation of Securities America and TD Ameritrade in light of our duty to obtain best execution.

Commissions or Sales Charges for Recommendations of Securities

As discussed above, certain employees in their respective individual capacities are Registered Representatives of Securities America. These certain employees are subject to FINRA Rules which restricts Registered Representatives from conducting securities transactions away from their broker-dealer unless Securities America provides written consent. Therefore, clients are advised that certain employees may be restricted to conducting securities transactions through Securities America unless they first secure written consent from Securities America to execute securities transactions through a different broker-dealer. Absent such written consent or separation from Securities America, these certain employees are prohibited from executing securities transactions through any broker-dealer other than Securities America under Securities America internal supervisory policies.

We are also cognizant of our duty to obtain best execution from all execution sources and have implemented policies and procedures reasonably designed in such pursuit.

ITEM 13 – REVIEW OF ACCOUNTS

Your accounts are under continuous review by our investment professionals. Portfolio reviews are conducted frequently to judge the appropriateness of securities held in your account. Accounts are reviewed if there is an extraordinary event such as abnormal performance of a mutual fund or individual equity, if there is a change in a mutual fund manager or if there is a significant market swing. Matthew Watters reviews all accounts and each Investment Adviser Representative is assigned his/her respective accounts under management. In addition to the monthly written statements that our clients receive from TD Ameritrade through the mail or via email our clients receive quarterly, semiannual, or annual reviews that include, but are not limited to, evaluation and review of securities currently held in an account, performance review, and review of activity in the account since the last review.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

We are required to disclose any relationship or arrangement where we receive an economic benefit from a third party (non-client) for providing advisory services. In addition, we are required to disclose any direct or indirect compensation that we provide for client referrals. At this time, we do not use the services of solicitors, affiliated or non-affiliated.

As a result of our relationship with Securities America, we may receive production bonuses, stock or stock options to purchase shares of Securities America’s parent company, and other things of value such as free or reduced-cost attendance at Securities America’s national sales conference or top producer forums and events. Such compensation may be based on overall business produced and/or the amount of assets serviced through Securities America. Thus, there is a financial incentive for us to recommend that you select Securities America as the custodian for your investment management

account so that we will be compensated. We take our responsibilities to clients very seriously and we will only recommend that clients hire us for management services if we believe it is appropriate and in the client's best interests.

We receive an economic benefit from TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12- Brokerage Practices). The availability to us of TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients.

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving these services, we may have an incentive to continue to use or expand the use of TD Ameritrade services. Our firm examined this conflict of interest when we chose to enter into the relationship with TD Ameritrade and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

TD Ameritrade charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). TD Ameritrade enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. TD Ameritrade commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by TD Ameritrade may be higher or lower than those charged by other custodians and broker-dealers.

ITEM 15 – CUSTODY

We do not have physical custody of client funds or securities. If there is any activity in a client account, clients receive monthly statements from the account custodian. If there is no activity in a client account, clients receive quarterly statements from the account custodian. Clients may request an updated position report from their advisor at any time. Clients should carefully review those statements. Clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

ITEM 16 – INVESTMENT DISCRETION

Typically, we manage accounts on a discretionary basis. This means that you give us full and complete discretion and authority with respect to the management of your assets, including the authority to purchase, sell, exchange, convert and trade your assets, to choose broker-dealers and to subcontract and use sub-advisers. If you desire, you may impose restrictions on the securities or types of securities you would like us to invest in.

ITEM 17 – VOTING CLIENT SECURITIES

We will not vote proxies on behalf of client accounts. Although we may, on rare occasions and only at the client's request, offer clients advice regarding corporate actions and the exercise of proxy voting rights.

ITEM 18 – FINANCIAL INFORMATION

We do not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance. As an advisory firm that maintains discretionary authority for client accounts and is deemed to have custody of some assets, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. We have no additional financial circumstances to report.

Confidentiality

Protecting client privacy is very important to us. We view protecting its clients' private information as a top priority. Pursuant to the requirements of the Gramm-Leach-Bliley Act, we have instituted policies and procedures to ensure that customer information is kept private and secure. We do not disclose any non-public personal information about its clients or former clients to any nonaffiliated third parties, except as permitted by law. In the course of servicing a client account, we may share some information with its service providers, such as, but not limited to, transfer agents, custodians, broker/dealers, accountants, and lawyers.

We restrict internal access to non-public personal information about its clients to those employees who need to know that information in order to provide products or services to the client. We maintain physical and procedural safeguards that comply with federal standards to guard a client's non-public personal information and ensure its integrity and confidentiality. As emphasized above, it has always been and will always be our policy never to sell information about current or former customers or their accounts to anyone. It is also our policy not to share information unless required to process a transaction, at the request of our customer, or as required by law.

A copy of our privacy policy notice will be provided to each client prior to, or contemporaneously with, the execution of the advisory agreement. Thereafter, we will deliver a copy of the current privacy policy notice to its clients prior to changing its sharing practices.

BROCHURE SUPPLEMENTS – PART 2B OF FORM ADV

**Matthew Graham Watters
Midwest Heritage Financial Advisors**

**3580 EP True Parkway
West Des Moines, Iowa 50265
515-246-8378
website: N/A**

IARD/CRD Number: 2669304

December 21, 2020

This brochure supplement provides information about Matthew Watters that supplements the Midwest Heritage Financial Advisors brochure. You should have received a copy of that brochure. Please contact Matthew Watters, Chief Compliance Officer, at 515-246-8378 if you did not receive Midwest Heritage Financial Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Watters also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Matthew Watters

Born 1974

Post-Secondary Education:

Iowa State University, Ames, Iowa, BS, Business Administration, 08/1992-05/1995

Life Underwriter Training Council Fellow (LUTCF), June 1998, Requirements are:

- Be a member of a local association of the National Association of Insurance and Financial Advisors (NAIFA)
- Complete 6 courses (1 required and 5 elective)
- Successfully complete a proctored, online examination
- Complete 3 hours of ethics-related continuing education every two years (for designees earning credentials on/after 1/1/10)

He has passed Series 6 (12/1995), Series 7 (03/1999), Series 24 (10/1999), Series 63 (10/1995), Series 65 (01/2001), and the Securities Industry Essentials (SIE, 10/2018) Examinations.

Recent Business Background:

- Midwest Heritage Financial Advisors, West Des Moines, Iowa, President, Investment Adviser Representative, and Chief Compliance Officer, 11/2019 – Present
- Securities America, Inc., West Des Moines, Iowa, Registered Representative, 01/2006 – Present
- Midwest Heritage Financial Services, West Des Moines, Iowa, Insurance Agent, President, 01/2006 - Present
- Securities America Advisors, Inc., West Des Moines, Iowa, Investment Adviser Representative, 03/2006 to 11/2019

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Matthew Watters does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

Registered Representative of a Broker-Dealer

Matthew Watters is a Registered Representative with Securities America, Inc., a full service broker/dealer, member FINRA/SIPC. Securities America, Inc. and Securities America Advisors, Inc. are affiliated entities. In this capacity, Matthew may provide securities brokerage services and implement securities transactions under a commission-based arrangement. Matthew may be entitled to a portion of the brokerage commissions paid to Securities America, Inc. He may also be entitled to a portion of any ongoing distribution or service ("trail") fees from the sale of mutual funds.

A conflict of interest exists to the extent that Matthew can recommend the purchase of securities where he receives commissions or other additional compensation as a result. The receipt of commissions provides an incentive for Matthew to recommend investment products based on compensation he might receive from selling such products. However, Midwest Heritage does not allow advisors to earn commission on products that are included within advisory accounts.

Matthew is President of Midwest Heritage Financial Services and is also a licensed insurance agent. In this capacity, Matthew can sell insurance products such as fixed and variable life insurance products to clients and receive normal and customary commission compensation. You are under no obligation to purchase insurance products through Matthew on a commissionable basis. Matthew may receive other compensation such as fixed or variable life trails. The receipt of commissions and other compensation gives Matthew an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this conflict, clients purchasing insurance from Matthew will receive certain disclosure documents and complete additional documentation to complete the transaction. All insurance activity is supervised directly by the Midwest Heritage CCO. Matthew devotes approximately 25% of his time to commission securities business and approximately 25% of his time to insurance activities.

Matthew is also a FINRA Arbitrator and has served in that role since July 2003. He does not spend 10% of his time or earn 10% of his revenue in this role. Matthew is required to disclose information regarding any investment-related business or occupation in which Matthew is actively engaged and Matthew has no disclosures other than those listed in the Item 2 Recent Business Background Section.

Other Outside Business Activity

None of Matthew's other outside business activities are 10% of his time or revenue.

ITEM 5 Additional Compensation

Midwest Heritage's Supervised Persons do not receive additional compensation for advisory services.

ITEM 6 Supervision

Matthew Watters, Chief Compliance Officer, is responsible for monitoring the activities of Midwest Heritage's supervised persons. Matthew Watters' telephone number is 515-246-8378. Mr. Watters supervises the firm personnel and the investments made in client accounts. Mr. Watters monitors the investments recommended by the supervised persons to ensure those investments are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Mr. Watters periodically reviews the advisory activities of each supervised person, which may include reviewing individual client accounts and correspondence (including e-mails) sent to and received by the supervised persons. All of Midwest Heritage's supervised persons receive the Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material.

Ryan Patrick Mehalovich
Midwest Heritage Financial Advisors

3580 EP True Parkway
West Des Moines, Iowa 50265
515-246-8378
website: N/A

IARD/CRD Number: 5272363

December 21, 2020

This brochure supplement provides information about Ryan Mehalovich that supplements the Midwest Heritage Financial Advisors brochure. You should have received a copy of that brochure. Please contact Matthew Watters, Chief Compliance Officer, at 515-246-8378 if you did not receive Midwest Heritage Financial Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Ryan Mehalovich also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Ryan Mehalovich

Born 1981

Post-Secondary Education:

University of Iowa, Iowa City, Iowa, BBA, Marketing, 05/2005

Ryan has earned the Qualified Plan Financial Consultant, July 2012

He has passed Series 7 (05/2018), Series 63 (5/2018), Series 66 (03/2007), and the Securities Industry Essentials (SIE, 10/2018) Examinations.

The Qualified Plan Financial Consultant ("QPFC") is issued by the National Association of Plan Advisors (NAPA). NAPA members that have earned the QPFC designation have demonstrated the knowledge and skill required to support defined contribution plans subject to ERISA. NAPA QPFC designation holders have committed to adhere to the principles and rules of the NAPA code of conduct. QPFC designation holders also commit to an annual continuing education requirement designed to ensure that as a QPFC, they continue to develop the knowledge and skill required to serve as competent and ethical professionals.

Continuing Education Requirements

Annual Continuing Education Requirement

QPFC designation holders must complete ten (10) hours of Continuing Education ("CE") each calendar year following the calendar year the QPFC designation is earned. CE hours must meet the Continuing Education Content Standards outline below.

Each calendar year a minimum of four (4) hours of the annual ten (10) hour CE requirement must cover retirement plan ("Relevant Topics") identified in this continuing education policy statement. In addition, a minimum of one (1) hour of CE credit earned annually must address professional ethics and the ARA's Code of Professional Conduct.

Continuing Education Content Standards

Reported CE must meet the following standards qualify for continuing education credit:

- Content must be developed by person(s) qualified in the subject matter.
- Total CE credits reported or recorded each year must be no less than ten (10) CE credit hours.
- CE hours reported shall match the actual time on task rounded down to the nearest five (5) minute increment.
- One (1.0) hour of CE is equivalent to 50 minutes of instruction or study time on task

o After the first 50 minutes, CE hours may be accrued 5-minute increments where 5 minutes is equal to one tenth (0.1) CE credits.

o CE will not be accepted for any event less than 45 minutes time on task. This is equivalent to a nine-tenths (0.9) CE threshold.

- One (1) hour of ethics related CE must be earned and recorded each calendar year.
- Four (4) hours of retirement plan related Relevant Topics must be earned and recorded each calendar year.
- CE credits must be earned and reported for the current calendar year. CE credits may not be carried over from one calendar year to the next.

Recent Business Background:

- Midwest Heritage Financial Advisors, West Des Moines, Iowa, Investment Adviser Representative, 11/2019 – Present
- Securities America, Inc., West Des Moines, Iowa, Registered Representative, 05/2018 – Present
- Midwest Heritage Financial Services, West Des Moines, Iowa, Insurance Agent, 05/2018 - Present
- Securities America Advisors, Inc., West Des Moines, Iowa, Investment Adviser Representative, 05/2018 to 11/2019
- Northwest Wealth Management, LLC, Spirit Lake, Iowa, Investment Adviser Representative, 01/2012-04/2018

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

Ryan Mehalovich does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

Registered Representative of a Broker-Dealer

Ryan Mehalovich is a Registered Representative with Securities America, Inc., a full service broker/dealer, member FINRA/SIPC. Securities America, Inc. and Securities America Advisors, Inc. are affiliated entities. In this capacity, Ryan may provide securities brokerage services and implement securities transactions under a commission-based arrangement. Ryan may be entitled to a portion of the brokerage commissions paid to Securities America, Inc. He may also be entitled to a portion of any ongoing distribution or service ("trail") fees from the sale of mutual funds.

A conflict of interest exists to the extent that Ryan can recommend the purchase of securities where he receives commissions or other additional compensation as a result. The receipt of commissions provides an incentive for Ryan to recommend investment products based on compensation he might receive from selling such products. However, Midwest Heritage does not allow advisors to earn commission on products that are included within advisory accounts.

Ryan is also a licensed insurance agent. In this capacity, Ryan can sell insurance products such as fixed and variable life insurance products to clients and receive normal and customary commission compensation. You are under no obligation to purchase insurance products through Ryan on a commissionable basis. Ryan may receive other compensation such as fixed or variable life trails. The receipt of commissions and other compensation gives Ryan an incentive to recommend insurance products based on the compensation received, rather than on the client's needs. To address this conflict, clients purchasing insurance from Ryan will receive certain disclosure documents and complete additional documentation to complete the transaction. All insurance activity is supervised directly by the Midwest Heritage CCO. Ryan devotes approximately 25% of his time to commission securities business and approximately 10% of his time to insurance activities.

Ryan is required to disclose information regarding any investment-related business or occupation in which Ryan is actively engaged and Ryan has no disclosures other than those listed in the Item 2 Recent Business Background Section.

Other Outside Business Activity

None of Ryan's other outside business activities are 10% of his time or revenue.

ITEM 5 Additional Compensation

Midwest Heritage's Supervised Persons do not receive additional compensation for advisory services.

ITEM 6 Supervision

Matthew Watters, Chief Compliance Officer, is responsible for monitoring the activities of Midwest Heritage's supervised persons. Matthew Watters' telephone number is 515-246-8378. Mr. Watters supervises the firm personnel and the investments made in client accounts. Mr. Watters monitors the investments recommended by the supervised persons to ensure those investments are suitable for the particular client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. Mr. Watters periodically reviews the advisory activities of each supervised person, which may include reviewing individual client accounts and correspondence

(including e-mails) sent to and received by the supervised persons. All of Midwest Heritage's supervised persons receive the Investment Adviser Supervisory Manual and Code of Ethics and are asked to annually certify to their understanding of the material.