DISCLOSURE BROCHURE (Form ADV Part 2A)

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This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Grand Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 616.451.4228 or by email at info@grandwealth.com.

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 Grand Wealth Management and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 132137.

March 26, 2020

GWM GRAND WEALTH MANAGEMENT

MATERIAL CHANGES

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

Grand Wealth Management believes that communication and transparency are the foundation of our relationship, and we continually strive to provide our clients with complete and accurate information. We encourage all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Summary of Material Changes

There have been changes to this Disclosure Brochure that we are required to disclose to clients. These material changes include:

- Grand Wealth Management has designated Janelle Anderson as the new Chief Compliance Office (CCO). The change in CCO from Jeff Williams to Janelle Anderson is effective immediately.
- Grand Wealth Management has amended its minimum fee for wealth management services. Please see Fees and Compensation for additional details.
- Grand Wealth Management moved their office location. The new office location is: 333 Bridge Street NW, Suite 800, Grand Rapids, MI 49504.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to each client annually and upon any material change in our business practices.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 132137.

You may also request a copy of this Disclosure Brochure at any time by contacting us at 616.451.4228 or by email at info@grandwealth.com.

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ADVISORY BUSINESS

Grand Wealth Management, LLC (also referred to as “we” and “our”) is an independent investment advisory and financial planning firm that serves select individuals, families and institutions. We provide the following services, described in further detail below:

- Wealth Management Services
- Institutional Investment Management Services
- Retirement Plan Advisory Services
- Portfolio Management Services
- Financial Planning and Consulting Services

We are a fee-only firm, which means our only compensation comes from our clients and not from any other individual or entity. We do not sell any commissioned products such as annuities and insurance, nor do we accept commissions in any form, including fees from mutual fund companies whose funds we recommend to clients.

Grand Wealth Management serves as a fiduciary to clients, as defined under the applicable laws and regulations. As a fiduciary, we uphold a duty of loyalty, fairness and good faith towards each client and seek to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Grand Wealth Management was founded in 2004 and is 100% owned by Jeffrey S. Williams, Steven A. Starnes and Janelle N. Anderson.

As of December 31, 2019, Grand Wealth Management manages $404,205,689 for 142 clients. Of this amount, $370,322,028 is managed on a discretionary basis, and $33,883,661 is managed on a non-discretionary basis.

Wealth Management Services

Grand Wealth Management offers wealth management services to individuals, including business owners, professionals, executives, retirees and their family members. Wealth management combines discretionary investment management with financial planning to deliver a personalized experience for each client.

We use a systematic wealth management process to determine and implement a plan that is best suited to each client. This process is designed to enable us to:

1. Understand each client’s true goals, needs, concerns and opportunities;
2. Create the best possible plan for achieving those goals; and
3. Keep track at each step of the process.

The result of the process is a written wealth management plan, which includes an assessment of the client’s current situation as well as recommendations for repositioning the client’s portfolio. Recommendations take into account portfolio costs as well as the potential tax impact of the restructuring.

We may offer an initial complimentary consultation to review the client’s needs and objectives, and may provide a written plan describing our recommendations at no cost. However, wealth

management services are initiated only with the execution of an investment management agreement and investment policy statement.

Regular progress meetings are scheduled to discuss any new developments in the client's personal or financial situation and to review the client's investments. Investment reviews entail analyzing client portfolios to help ensure the investment strategy and expectations are structured to continue to meet the client's stated needs and objectives. While we encourage quarterly client contact, the frequency and timing may vary depending upon the client's situation or desires, but will typically occur no less than annually.

Based on the client's situation, needs and objectives, wealth management services also include financial assessment and planning. Financial planning may address specific client needs such as retirement planning, tax planning, charitable planning, succession planning, risk management, education funding, major purchases, business planning and estate planning. We may provide comprehensive planning services or the client may desire advice on certain planning components.

Institutional Investment Management Services

Grand Wealth Management offers institutional investment management services for foundations and endowments, corporations and other business entities. Institutional investment management involves developing, implementing and monitoring investment programs for institutional funds. We structure a prudent investment approach designed to meet the client's legal responsibilities and fiduciary standards of care. A data gathering process is completed in an effort to determine the client's needs, goals, objectives, time horizons and any other relevant information.

Based upon information provided by the client, and with the client's input, we prepare an investment policy statement, including a target asset allocation. With the approval of the client, the recommended investment policy statement is implemented and managed in an effort to help achieve the client's goals.

Retirement Plan Advisory Services

Grand Wealth Management delivers investment advisory and management solutions to employer-sponsored retirement plans. Specifically, our services include: (1) discretionary investment management services, (2) nondiscretionary investment advisory services, and/or (3) consulting services. Depending on the type of the plan and the specific arrangement with the client, we may provide one or more of these services.

When providing investment advisory and/or management services to retirement plans covered under the Employee Retirement Income Security Act ("ERISA"), we acknowledge our status as a "fiduciary" under Section 3(21) with respect to the investment-related services described in our investment fiduciary and retirement plan consulting agreement. We may also exercise discretion over select plan investments and serve as an "investment manager" as defined under ERISA Section 3(38). As a fiduciary under ERISA, we will act solely in the interests of plan participants and beneficiaries with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. Grand Wealth Management provides the following retirement plan advisory services:

1. Discretionary Investment Management Services

These services are designed to allow the plan fiduciary to delegate responsibility for managing, acquiring and disposing of plan assets that meet the requirements of ERISA. Grand Wealth Management will perform these investment management services and may charge an asset-based or flat fee for services, as described in this Form ADV and the agreement. Grand Wealth Management will deliver these services to the plan as a fiduciary under ERISA Section 3(21) and will act solely in the interests of plan participants and beneficiaries with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. When providing the following investment management services, Grand Wealth Management will exercise discretionary authority or control over assets of the plan, and if applicable, may serve as investment manager to the plan under ERISA Section 3(38):

- **Selection, Monitoring and Replacement of Designated Investment Alternatives ("DIAs")**: Grand Wealth Management will review with the client the investment objectives, risk tolerance and goals of the plan and provide to client an Investment Policy Statement ("IPS") that contains criteria from which we will select, monitor and replace the plan's DIAs. Once approved by the client, we will review the investment options available to the plan and will select the plan's DIAs in accordance with the criteria set forth in the IPS. On a periodic basis, Grand Wealth Management will monitor and evaluate the DIAs and replace any DIA(s) that no longer meet the IPS criteria.
- **Creation and Maintenance of Model Asset Allocation Portfolios ("Models")**: Grand Wealth Management will review with client the investment objectives, risk tolerance and goals of the plan and provide to client an IPS or other documentation that contains criteria from which we will select, monitor and replace the plan's Models. We will create a series of risk-based Models comprised solely among the plan's DIAs; and, on a periodic basis and/or upon reasonable request, we will reallocate and rebalance the Models in accordance with the IPS or other guidelines approved by the client.
- **Selection, Monitoring and Replacement of Qualified Default Investment Alternatives ("QDIA(s)")**: Grand Wealth Management will review with the client the investment objectives, risk tolerance and goals of the plan and provide to the client an IPS or other guidelines that contains criteria from which we will select, monitor and replace the plan's QDIA(s). Once the client confirms the plan's desired QDIA type, we will select, monitor and replace the QDIA(s) in accordance with the IPS or other guidelines approved by the client.

2. Nondiscretionary Investment Advisory Services

These services are designed to allow the client to retain full discretionary authority and control over assets of the plan, and Grand Wealth Management will solely be making recommendations to the client. We may charge an asset-based or flat fee for the services, as described in this Form ADV and the agreement. We will perform these investment advisory services to the plan as a fiduciary under ERISA Section 3(21) and will act with the degree of diligence, care and skill that a prudent person rendering similar services would exercise under similar circumstances. The client may engage us to perform one or more of the following nondiscretionary investment advisory services:

- **Advice Regarding Establishing or Revising the Investment Policy Statement (IPS):** Grand Wealth Management will review with the client the investment objectives, risk tolerance and goals of the plan. If the plan does not have an IPS, we will provide recommendations to the client to assist in establishing an IPS. If the plan has an existing

IPS, we will review it for consistency with the plan's objectives. If the IPS does not represent the objectives of the plan, we will recommend to the client revisions that will establish investment policies that are congruent with the plan's objectives.

- **Advice Regarding DIAs:** Based on the plan's IPS, Grand Wealth Management will review the investment options available to the plan and will make recommendations to assist the client in selecting DIAs to be offered to plan participants. Once the client selects the DIAs, we will, on a periodic basis and/or upon reasonable request, provide reports and information to assist the client in monitoring the DIAs. If the IPS criteria require any DIA(s) to be replaced, we will provide recommendations to assist the client in replacing the DIA(s).
- **Advice Regarding Models:** Based on the plan's IPS or other investment guidelines established by the plan, Grand Wealth Management will review the investment options available to the plan and will make recommendations to assist the client to create and maintain Model Portfolios. Once the Sponsor approves the Models, we will provide reports, information and recommendations, on a periodic basis, designed to assist the client to monitor the plan's investments. If the IPS criteria require any DIA(s) to be removed, we will provide recommendations to assist the client to evaluate replacement DIA(s) to be included in the Models. Upon reasonable request, we will make recommendations to the client to rebalance the Models to maintain their desired allocations.
- **Advice Regarding QDIAs:** Based on the plan's IPS or other guidelines established by the plan, Grand Wealth Management will review the investment options available to the plan and will make recommendations to assist the client in selecting the plan's QDIA(s) for plan participants that are automatically enrolled in the plan and/or who fail to direct the investment of their individual accounts. Once the client selects the plan's QDIA(s), we will provide reports and information, on a periodic basis and/or upon reasonable request, to assist the client in monitoring the QDIA(s). If the IPS criteria require a QDIA to be replaced, we will provide recommendations to assist the client in evaluating the QDIA(s).

3. Consulting Services

Consulting services are designed to allow us to assist our clients in meeting their fiduciary duties to manage and administer the plan prudently. The client may elect for Grand Wealth Management to provide assistance with plan governance in any of the following areas:

- **Administrative Support, including:**
  - Assist plan sponsor in reviewing objectives and options available through the plan
  - Review plan committee structure and administrative policies/procedures
  - Recommend participant education and communication policies under ERISA 404(c)
  - Assist with development/maintenance of fiduciary audit file and document retention policies
  - Deliver Fiduciary training as deemed necessary
  - Provide periodic review of plan design
  - Provide periodic review of participant demographics

- **Oversight of Relationship with Service Providers, including:**
  - Deliver service specific to selection, monitoring and replacement of Covered Service Providers (CSP)
  - Coordinate process for reviewing CSP disclosures under ERISA 408(b)(2)
  - Review CSP performance and assist with fee/service benchmarking periodically and/or upon request
  - Assist with preparation and review of Requests for Proposals (RFPs) and/or Information (RFI)
  - Coordinate and assist with CSP replacement and conversion

- **Investments, including:**
  - Periodic review of investment policy in the context of plan objectives
  - Assist the plan committee with monitoring investment performance
  - Provide analysis of investment managers and model portfolios
  - Review and recommend Designated Investment Managers (DIMs) and/or third-party advice providers as necessary
  - Educate plan committee members, as needed, regarding replacement of DIA(s) and/or QDIA(s)

- **Participant Services, including:**
  - Help plan sponsor develop and implement an overall strategy for delivery of participant services
  - Facilitate group enrollment meetings
  - Coordinate employee education regarding plan investments and fees
  - Assist plan participants in understanding plan benefits, evaluating retirement readiness and impact of increasing deferrals
  - Assist plan sponsor in establishing success metrics

Portfolio Management Services

At our discretion, we may offer portfolio management services for those who would not otherwise meet the minimum criteria for wealth management services. Portfolio management utilizes the same discretionary investment management approach provided to wealth management clients, but does not include comprehensive financial planning. Our recommendations are presented to each client based on their circumstances. As with wealth management services, portfolio management services are initiated only with the execution of an investment management agreement and investment policy statement.

Financial Planning and Consulting Services

At our discretion, we may offer financial planning and consulting services at an hourly rate or at a fixed fee project rate for those who do not desire comprehensive wealth management or other ongoing investment management services. Financial planning and consulting services may address general financial matters or be focused on particular issues, depending upon the client's needs. Topics may range from overall investment advisory questions, research and analysis, discussions pertaining to the financial impact of a life event, assistance with goals and objectives, or various issues as may be requested by the client.

FEES AND COMPENSATION

Except as indicated, fees are calculated as a percentage of assets under management and billed quarterly in advance of services. Fees are based on the billable balance on the last trading day of the preceding calendar quarter. Fees are prorated for significant deposits and withdrawals or where services are initiated at any time other than the beginning of a calendar quarter.

Wealth Management Fees

Wealth management services are designed for those with $1 million or more of investment assets. The annual wealth management fee is as follows, subject to a minimum quarterly fee of $2,500:

First $1,000,000 of assets	1.00%
Next $2,000,000 of assets	0.75%
Next $3,000,000 of assets	0.50%
Additional assets	0.25%

At our discretion, we may extend wealth management services to those who have less than $1 million of investment assets but who are on a path to reach $2 million or more at their targeted retirement date. For these “emerging” wealth management clients, a lower minimum quarterly fee of $1,200 will apply.

In certain other cases, the wealth management fee may be modified and based on the nature of services to be provided, types of investments, portfolio makeup, and/or the complexity of the client’s situation. Wealth management fees are determined at the time of engagement at our discretion and are specifically outlined in the client’s investment management agreement.

Institutional Investment Management Fees

The annual institutional investment management fee is as follows, subject to a minimum quarterly fee of $1,875:

First $1,000,000 of assets	0.75%
Next $2,000,000 of assets	0.50%
Additional assets	0.25%

In certain cases, the institutional investment management fee may be modified and based on the nature of services to be provided, types of investments, portfolio makeup, and/or the complexity of the client’s situation. Institutional investment management fees are determined at the time of engagement at our discretion and fees are specifically outlined in the client’s investment management agreement.

Retirement Plan Advisory Fees

Retirement plan advisory fees are negotiable and based on the nature and scope of services to be provided, the level of fiduciary responsibility assumed, the complexity and size of the plan, and/or other unique characteristics of the engagement. Our annual retirement plan advisory fees generally range from 0.10% to 0.75% of assets. In certain cases, we may impose a minimum quarterly fee or provide the services on a flat fee basis. Retirement plan advisory fees are

determined at the time of engagement at our discretion and are specifically outlined in the client's investment fiduciary and retirement plan consulting agreement.

Portfolio Management Fees

The annual portfolio management fee is 1.00% of assets, subject to a minimum quarterly fee of $1,250. In certain cases, the portfolio management fee may be modified and based on the nature of services to be provided, types of investments, portfolio makeup, and/or the complexity of the client's situation. Portfolio management fees are determined at the time of engagement at our discretion and fees are specifically outlined in the client's investment management agreement. If a portfolio management client's assets increase to a level above $1,000,000, the wealth management fee schedule and service offering will apply.

Financial Planning and Consulting Fees

Fees for financial planning and consulting are calculated at a maximum hourly rate of $500, depending upon the complexity, nature of services or expertise required. An estimate is provided before services are performed, and we may require a retainer equal to one-half of the projected fee in order to schedule projects. Fees or project balances for financial planning and consulting are due and payable upon delivery of the services. We generally require a minimum engagement fee of $2,500.

Collection of Fees and Termination of Services

Payment of investment advisory fees is typically made through a debit directly to the client's account by the "qualified custodian" holding the client's funds.

Investment management services are ongoing but clients can terminate the investment management agreement at any time with written notice. In such cases, we will promptly return a pro-rata refund of any unearned advisory fees. The client will be responsible for advisory fees up to and including the effective date of termination. The client's agreement with Grand Wealth Management is non-transferable without the client's prior consent.

Other Fees

In addition to the advisory fees paid to us, clients pay transaction fees to the custodian of their account, as applicable. Our recommended custodian does not charge securities transaction fees for ETF and equity trades in a client's account, provided that the account meets the terms and conditions of the custodian's brokerage requirements. However, the custodian typically charges for mutual funds and other types of investments.

All fees paid to Grand Wealth Management for investment management services are separate from the fees and expenses charged to shareholders of mutual fund shares by the fund companies, or by the investment manager of the fund. Complete explanations of the expenses charged by mutual funds are contained in each fund's prospectus. Investors are encouraged to read any offering document or prospectus before investing funds. We receive no portion of these fees.

PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Grand Wealth Management does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

We do not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk to the client.

TYPES OF CLIENTS

Grand Wealth Management provides advisory services to individuals, families and institutions. Wealth management and portfolio management services are provided to individuals, including business owners, professionals, executives, retirees and their family members. Institutional investment management and retirement plan advisory services are provided to foundations and endowments, qualified retirement plans, corporations and other business entities.

As described in Fees and Compensation above, we require minimum fees and/or asset levels for each of our services. We reserve the right to decline services to any person or firm for any reason at our discretion. We also reserve the right to reduce or waive minimum conditions based upon special client circumstances, a pre-existing relationship (e.g., family or client), the ability to achieve a portfolio size that supports the minimum fee within a short period of time, or other conditions.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis and Investment Strategies

The basis for our investment recommendations is the Nobel Prize recognized investment strategy known as Modern Portfolio Theory. We also respect the well-publicized studies revolving around efficient markets, the long-term performance histories of value stocks versus growth stocks, small capitalization stocks versus large capitalization stocks, and passive versus active management. We objectively apply this historical and ongoing research to construct portfolios for relative and absolute performance. More importantly, each client's portfolio is designed to meet that client's stated objectives.

Grand Wealth Management adheres to the following investment principles and beliefs:

1. Markets are efficient: Security prices reflect available information.
2. Structure determines performance: Asset allocation along size, value and market exposure dimensions primarily determines the results of a broadly diversified portfolio.
3. Risk and return are related: Exposure to meaningful risk factors determines expected return.
4. Diversification is essential: Diversification reduces uncertainty; concentrated investments add risk with no additional expected return.
5. Costs and taxes matter: Expenses and taxes reduce net returns.

We also adhere to the passive style of investing and therefore recommend indexed and passive mutual funds and exchange traded funds. Individual securities and actively managed funds are

generally not recommended. We typically recommend that clients invest in low-cost institutional asset class funds advised by Dimensional Fund Advisors, Vanguard, or other fund companies that have low operating expenses, low portfolio turnover, below average capital gains distributions and a fundamental investment objective of investing primarily in a particular asset class.

We will periodically recommend rebalancing of clients' portfolios. Fairly wide latitude is given to rebalancing, as taxes and transaction costs influence the decisions made.

Recommendations for or purchases of investments are based on publicly available reports and analysis. We utilize many sources of public information including financial news and research materials.

For wealth management clients, we may hold existing securities in client accounts in the pursuit of client objectives and with the client's direction. We may also recommend the use of a third party asset management firm to manage individual equity or fixed income securities in a separate account. In this instance, at the time of the recommendation we will deliver to clients the Disclosure Brochure, compensation disclosure, and any other information required by securities rules and regulations. Clients are never under any obligation to utilize services that may be recommended.

We may review offering documents for limited partnerships or alternative investments for content or appropriateness of investment and under a consultation agreement. However, we do not provide investment management or due diligence services for these types of investments.

Risk of Loss

All investment programs have certain risks that are borne by the investor, including the possible loss of principal. Our investment approach constantly keeps the risk of loss in mind. Nonetheless, investors face a number of investment risks including the following:

- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
- Interest Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments – primarily fixed income securities – may have to be reinvested at a potentially lower rate of return (i.e. interest rate).
- Business Risk: These risks are associated with a particular industry or a particular company within an industry.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product.

DISCIPLINARY INFORMATION

Neither Grand Wealth Management nor any of its Supervised Persons have been involved in any legal or disciplinary events related to past or present clients.

OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Grand Wealth Management is an independent, fee-only investment advisory firm. Neither the firm nor its Advisory Persons are registered as a broker/dealer or as representatives of a broker/dealer firm. We do not participate in fee-sharing agreements with any of our service providers.

CODE OF ETHICS, PARTICIPATION IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Grand Wealth Management has adopted a Code of Ethics for all Supervised Persons describing the firm's high standard of business conduct and fiduciary duties to its clients. We will provide a copy of the Code of Ethics to any client or prospective client upon request.

We do not currently participate in securities in which we have a material financial interest. Grand Wealth Management and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or individuals subject to its compliance program (our "Supervised Persons") has a material financial interest.

Grand Wealth Management and its Supervised Persons may buy or sell shares of mutual funds that are also held by clients. However, at no time do we, or any Supervised Person, receive an added benefit or advantage over clients with respect to these transactions. We monitor and maintain records of personal securities transactions of our Supervised Persons with access to client holdings and transaction information (our "Access Persons") to ensure that our clients are not adversely affected.

BROKERAGE PRACTICES

Grand Wealth Management has access to various custodians and clients are welcome to select their preferred custodian. We primarily recommend that clients establish their accounts with Fidelity Clearing & Custody Solutions, a related entity of Fidelity Investments, Inc. ("Fidelity"), where we maintain an institutional relationship. The recommendation of the preferred service provider is based on the discounted rates, product offerings, and execution services available. As such, we do not believe this relationship rises to the level of a "soft dollar" relationship. We do not participate in soft dollar programs sponsored or offered by any broker-dealer.

Grand Wealth Management also participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Grand Wealth Management receives some benefits from TD Ameritrade through its participation in the program. Please see Client Referrals and Other Compensation below for additional details about the benefits.

We recognize our duty to best execution for all of our clients under the circumstances available. The decision to utilize a preferred service provider is based upon the customer service provided to investors and the services available to us. While it is possible that clients may pay higher commissions or transaction fees through the preferred services provider, we have determined the service provider currently offers the best overall value to us and our clients for the service, brokerage and technology provided. We will not engage in any principal transactions (i.e., trading a security from or to our own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client's account).

Fidelity's institutional platform services that assist us in managing and administering clients' accounts include software and other technology that:

- Provide access to client account data (such as trade confirmations and account statements);
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- Provide research, pricing and other market data;
- Facilitate payment of fees from clients' accounts; and
- Assist with back-office functions, recordkeeping and client reporting.

Fidelity also offers other services intended to help us manage and further develop our advisory practice. Such services include third party research, publications, educational conferences, practice management resources, and access to consultants and other third party service providers who provide a wide array of business related services and technology with whom we may contract directly.

We periodically review other alternatives that are available to the advisor market. However, we believe that excellent customer service and trade execution is superior to most non-service oriented, deep-discount and internet-based brokers that may otherwise be available to the public. The preferred service provider features a broad line of products and services that are available to every investor, regardless of the amount of investable assets.

Aggregating and Allocating Trades

Transactions for each client are typically placed independently, unless we decide to purchase or sell the same securities for several clients at approximately the same time. We may (but are not obligated to) combine or "batch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among our clients differences in prices and commissions or other transaction costs that might not have been obtained had such orders been placed independently. Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that we determine to aggregate client orders for the purchase or sale of securities, including securities in which our Supervised Persons may invest, we generally do so in accordance with applicable rules promulgated under the Investment Advisers Act of 1940 and no-action guidance provided by the staff of the SEC. Grand Wealth Management does not receive any additional compensation or remuneration as a result of the aggregation.

To the extent block trading occurs, the goal for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the custodian.

Grand Wealth Management will execute its transactions through the custodian as directed by the client. We may aggregate orders in a block trade or trades when securities are purchased or sold through the custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular client accounts.

REVIEW OF ACCOUNTS

Securities in client accounts are reviewed at least quarterly by a team of investment advisor representatives assigned to each client. Additional reviews may be conducted based on various factors, including account contributions and withdrawals, year-end tax planning, material market events, or at the request of the client.

Clients receive monthly or quarterly statements from the account custodian. We also prepare periodic reports for clients showing the performance of their accounts.

CLIENT REFERRALS AND OTHER COMPENSATION

Grand Wealth Management receives client referrals from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources. We do not compensate referring parties for these referrals. We do not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

We invest a significant portion of client assets in mutual funds advised by Dimensional Fund Advisors (“DFA”), an unaffiliated investment advisor. DFA provides us with educational conferences, access to academic research, portfolio modeling software, and marketing support. None of the assistance provided by DFA is dependent on us investing a specified amount of client assets in DFA funds. Mutual funds sponsored by DFA are generally only available through registered investment advisors. If a client were to terminate with Grand Wealth Management, restrictions regarding transferability and/or additional purchases of, or reallocation among, DFA funds will apply.

Grand Wealth Management has established an institutional relationship with Fidelity to assist us in managing client accounts. Access to the Fidelity institutional platform is provided at no charge to us. We receive access to software and related support without cost because we render investment management services to clients that maintain assets at Fidelity. The software and related systems support may benefit us, but not our clients directly. In fulfilling out duties to our clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence our recommendation of this custodian over one that does not furnish similar software, systems support, or services Additionally, we may receive the following benefits from Fidelity: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication network for client order entry and account information.

In addition, as disclosed under Brokerage Practices above, Grand Wealth Management participates in TD Ameritrade's institutional customer program and Grand Wealth Management may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Grand Wealth Management's participation in the program and the investment advice it gives to its clients, although Grand Wealth Management 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): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Grand Wealth Management 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 Grand Wealth Management by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Grand Wealth Management's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Grand Wealth Management but may not benefit its client accounts. These products or services may assist Grand Wealth Management in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Grand Wealth Management manage and further develop its business enterprise. The benefits received by Grand Wealth Management or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Grand Wealth Management endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Grand Wealth Management or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Grand Wealth Management's choice of TD Ameritrade for custody and brokerage services.

CUSTODY

All clients must maintain their accounts with a "qualified custodian" as described in Item 12 above. Grand Wealth Management accepts custody of a client's funds or securities through the deduction of management fees from the client's accounts at the custodian, and in certain situations where a Supervised Person of Grand Wealth Management may have access to a client's held-away account login credentials.

Clients will receive account statements at least quarterly (and generally monthly) from the custodian. Clients are urged to compare the custodian account statements against statements prepared by Grand Wealth Management for accuracy. Minor variations may occur because of reporting dates, accrual methods of interest and dividends, and other factors. The custody statement is the official record of client accounts for tax purposes. For more information about custodians and brokerage practices, see Item 12 above.

As Grand Wealth Management is deemed to have custody over certain client accounts and/or securities as part of their access to client login credentials, pursuant to securities regulations Grand Wealth Management is required to engage an independent accounting firm to perform an annual surprise examination of those assets and accounts over which we maintain custody. Any related

opinions issued by an independent accounting firm are filed with the SEC and are publicly available on the SEC's Investment Adviser Public Disclosure website (http://adviserinfo.sec.gov).

If the client gives us authority to move money from one account to another account, we may have custody of those assets. In order to avoid additional regulatory requirements in these cases, we, along with the custodian, have adopted safeguards to ensure that the money movements are completed in accordance with the client's instructions.

INVESTMENT DISCRETION

Grand Wealth Management generally has discretionary trading authority to execute securities transactions in the client's portfolio. Client authorization is provided in the custodial account forms and agreements. Trades are made within the client's designated investment objectives, to include the securities to be bought and sold, and the amount of securities to be bought and sold.

We will never have full power of attorney nor will we ever have the authority to withdraw funds or take custody of client funds or securities other than the ability to deduct advisory fees through the client's qualified custodian, with the client's authorization.

VOTING CLIENT SECURITIES

As a matter of firm policy and practice, we do not have any authority to and do not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in their accounts. We may provide advice to clients regarding the voting of proxies.

FINANCIAL INFORMATION

Grand Wealth Management does not take custody of client funds or accept fees in excess of $1,200 for services to be performed six months or more in advance. We do not have any financial commitments that would impair our ability to meet contractual and fiduciary commitments to clients. We have not been the subject of a bankruptcy proceeding.

BROCHURE SUPPLEMENT (PART 2B OF FORM ADV)

This brochure supplement provides information about our investment advisor representatives that supplements the Grand Wealth Management brochure. You should have received a copy of that brochure. Please contact us at 616.451.4228 if you did not receive our brochure or if you have any questions about the contents of this supplement.

Additional information about our investment advisor representatives is available on the SEC's website at www.adviserinfo.sec.gov.

Education and Business Standards

Grand Wealth Management generally requires successful completion of university study and/or its educational or business equivalent for its advisors. Investment professionals demonstrate the knowledge and skills by either business background, education, professional designations or any combination thereof. Generally, weight will be given to candidates with advanced professional certifications in the financial services industry.

Professional Certifications

Employees have earned the following certifications and credentials that are required to be explained in further detail.

Certified Financial Planner™ (CFP®)

The Certified Financial Planner™ designation is a professional certification mark for financial planners, conferred by the Certified Financial Planner Board of Standards, Inc. To be authorized to use the designation, the candidate must meet education, examination, experience and ethics requirements:

- Attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university);
- Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services;
- Pass the comprehensive 10-hour CFP® Certification Examination;
- Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year);
- Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals;
- Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*; and
- Renew an agreement to be bound by the *Standards of Professional Conduct* which require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

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

Certified Investment Management Analyst® (CIMA®)

The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application. The designation is administered through Investment Management Consultants Association (IMCA). CIMA® certification requirements are:

- Complete three years of financial services experience, with an acceptable regulatory history;
- Pass an online Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider at an AACSB accredited university business school, and pass an online Certification Examination;
- Complete 40 hours of continuing education credits, including two ethics hours, every two years; and
- Adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rules and Guidelines for Use of the Marks.

Accredited Investment Fiduciary® (AIF®)

The AIF® designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. The certification is administered by the Center for Fiduciary Studies, LLC (a Fiduciary360 company). AIF® designation requirements are:

- Complete a training program;
- Pass a comprehensive, closed-book final examination under the supervision of a proctor;
- Agree to abide by the AIF® Code of Ethics;
- Complete six hours of continuing education credits every year; and
- Renew, on an annual basis, affirmation of the AIF® Code of Ethics.

Certified Public Accountant (CPA)

CPAs are licensed and regulated by their state boards of accountancy. While state laws and regulations vary, the education, experience and testing requirements for licensure as a CPA generally include the following:

- Minimum college education (typically 150 credit hours with at least a baccalaureate degree and a concentration in accounting);
- Minimum experience levels (most states require at least one year of experience providing services that involve the use of accounting, attest, compilation, management advisory, financial advisory, tax or consulting skills, all of which must be achieved under the supervision of or verification by a CPA);
- Pass the Uniform CPA Examination
- Complete 40 hours of continuing professional education (CPE) each year (or 80 hours over a two year period or 120 hours over a three year period); and
- American Institute of Certified Public Accountants (AICPA) members are required to follow a *Code of Professional Conduct* which requires that they act with integrity, objectivity, due care, competence, fully disclose any conflicts of interest (and obtain client consent if a conflict exists), maintain client confidentiality, disclose to the client any

commission or referral fees, and serve the public interest when providing financial services.

Personal Financial Specialist (PFS)

The PFS credential demonstrates that an individual has met the minimum education, experience and testing required of a CPA in addition to a minimum level of expertise in personal financial planning. The PFS credential is administered through the AICPA. To attain the PFS credential, a candidate must:

- Hold an unrevoked CPA license;
- Fulfill 3,000 hours of personal financial planning business experience;
- Complete 80 hours of personal financial planning CPE credits;
- Pass a comprehensive financial planning exam;
- Be an active member of the AICPA;
- Complete 60 hours of financial planning CPE credits every three years; and
- Adhere to AICPA's *Code of Professional Conduct*; encouraged to follow AICPA's *Statement on Responsibilities in Financial Planning Practice*.

Supervision

All investment advisor representatives are supervised by Jeff Williams, Managing Principal, and Steve Starnes, Principal, both of Grand Wealth Management. Overall compliance supervision is performed by Janelle Anderson, Chief Compliance Officer of Grand Wealth Management, through reviews of internal transaction and security holding reports, electronic and physical correspondence, and other internal reports as mandated by the firm and its regulatory authorities. Jeff, Steve and Janelle can be contacted at 616.451.4228.

Grand Wealth Management has implemented a Code of Ethics and internal compliance program that guide each Supervised Person in meeting their fiduciary obligations to our clients. Further, we are subject to regulatory oversight by various agencies. These agencies require registration by Grand Wealth Management and its Supervised Persons. As a registered entity, we are subject to examinations by regulators, which may be announced or unannounced. We are required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of Grand Wealth Management.

Jeffrey S. Williams, CFP®, CIMA®, AIF®, CPA/PFS

Managing Principal and Chief Compliance Officer

Year of Birth: 1965

Educational Background:

- Michigan State University, East Lansing, MI – B.A., Accounting (1986)
- Grand Valley State University, Allendale, MI – M.S., Taxation (1990)

Business Experience:

- Grand Wealth Management, LLC, Grand Rapids, MI (2004-Present)
- Ernst & Young, LLP, Grand Rapids, MI (1986-2004)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Jeff Williams serves as Managing Principal of Grand Wealth Management. Jeff can be contacted at 616.451.4228.

Steven A. Starnes, CFP®

Principal

Year of Birth: 1978

Educational Background:

- University of Michigan, Ann Arbor, MI – B.S.E., Aerospace Engineering and B.A., Economics (2001)
- University of Virginia, Charlottesville, VA – Master of Business Administration (2010)

Business Experience:

- Grand Wealth Management, LLC, Grand Rapids, MI (2015-Present)
- Savant Capital Management, McLean, VA (2012-2015)
- The Monitor Group, McLean, VA (2006-2012)
- Vintage Financial, Ann Arbor, MI (2004-2005)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Steve is supervised by Jeff Williams, Managing Principal. He reviews his work through frequent office interactions and review of activities in the firm's client relationship management system. Jeff can be contacted at 616.451.4228.

Anastasia K. Wiese, JD, CFP®

Financial Advisor

Year of Birth: 1988

Educational Background:

- Albion College, Albion, MI – B.A, Economics and Management (2010)
- Valparaiso University, Valparaiso, IN – J.D., Law (2013)

Business Experience:

- Grand Wealth Management, LLC, Grand Rapids, MI (2018-Present)
- Meadow Ridge Financial, LLC, Grand Rapids, MI (2017-2018)
- Strategies Wealth Advisors, Grand Rapids, MI (2017-2017)
- Ellis Capital Management, LLC, Muskegon, MI (2013-2017)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Anastasia is supervised by Jeff Williams, Managing Principal. He reviews her work through frequent office interactions and review of activities in the firm's client relationship management system. Jeff can be contacted at 616.451.4228.

Stephanie A. Trexler, CFP®

Associate Financial Advisor

Year of Birth: 1990

Educational Background:

- Central Michigan University, Mount Pleasant, MI – B.S.B.A., Personal Financial Planning (2013)

Business Experience:

- Grand Wealth Management, LLC, Grand Rapids, MI (2018-Present)
- Portfolio Solutions, Troy, MI (2017-2018)
- Girard Securities, Bingham Farms, MI (2014-2017)
- Financial Independents, Lansing, MI (2013-2014)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Stephanie is supervised by Steve Starnes, Principal. He reviews her work through frequent office interactions and review of activities in the firm's client relationship management system. Steve can be contacted at 616.451.4228.

Douglas A. Johnson

Associate

Year of Birth: 1981

Educational Background:

- Northern Kentucky University, Highland Heights, KY – B.S., Finance (2005)

Business Experience:

- Grand Wealth Management, LLC, Grand Rapids, MI (2012-Present)
- Legacy Trust, Grand Rapids, MI (2008-2012)
- Fifth Third Bank, Grand Rapids, MI (2007)
- Legg Mason Investment Counsel, Cincinnati, OH (2005-2007)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Doug is supervised by Steve Starnes, Principal. He reviews his work through frequent office interactions and review of activities in the firm's client relationship management system. Steve can be contacted at 616.451.4228.

Calvin D. Wiersma

Associate

Year of Birth: 1991

Educational Background:

- Calvin College, Grand Rapids, MI – B.A., Business Finance and B.A., Economics (2013)
- Grand Valley State University, Grand Rapids, MI – M.S., Taxation (2017)

Business Experience:

- Grand Wealth Management, LLC, Grand Rapids, MI (2020-Present)
- Fifth Third Private Bank, Grand Rapids, MI (2018-2019)
- Mirador Family Wealth Advisors, Grand Rapids, MI (2013-2018)

Disciplinary Information: None

Other Business Activities: None

Additional Compensation: None

Supervision:

Calvin is supervised by Steve Starnes, Principal. He reviews his work through frequent office interactions and review of activities in the firm's client relationship management system. Steve can be contacted at 616.451.4228.

PRIVACY POLICY

Effective Date: March 26, 2020

Our Commitment to You

Grand Wealth Management, LLC (“GWM”) is committed to safeguarding the use of your personal information that we have as your investment advisor. GWM (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

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

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

Why you need to know?
Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?	
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What sources do we collect information from in addition to you?	
Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How we share your information?
RIAs do need to share personal information regarding its clients to effectively implement the RIA’s services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: • Processing transactions; • General account maintenance; • Responding to regulators or legal investigations; and • Credit reporting, etc.	GWM may share this information.	Clients cannot limit GWM's ability to share.
Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	GWM may share this information.	Clients cannot limit GWM's ability to share.
Marketing Purposes GWM does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where GWM or the client has a formal agreement with the financial institution. **We will only share information for purposes of servicing your accounts, not for marketing purposes.**	GWM does not share personal information.	Clients cannot limit GWM's ability to share.
Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	GWM does share personal information.	Clients can limit GWM's ability to share.
Information About Former Clients GWM does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	GWM does not share personal information regarding former clients.	Clients can limit GWM's ability to share.

How do we protect your information?
To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.
Our employees are advised about GWM's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.
We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third party agreements.

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

Questions: You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at 616.451.4228 or by email at info@grandwealth.com.