

Item 1 – Cover Page

Registered as JCG Consulting, Inc. | Doing Business as: millionaireME wealth management



5 West Mendenhall Street | Bozeman, MT 59715

March 20, 2020

Form ADV 2A – Firm Disclosure Brochure

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of millionaireME wealth management (“the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (406) 600-8584 or jcg@MYmillionaireMe.com. millionaireME wealth management is an internet only SEC registered investment advisor. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about millionaireME wealth management to assist you in determining whether to retain the Advisor. Additional information about millionaireME 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 number 299970.

Item 2 – Material Changes

If the firm amends this brochure so that it contains material changes from the last annual update, the changes will be identified in this item.

- There are no material changes to disclose.

Clients will receive, at no charge, a summary of any material changes within 120 days of December 31st and promptly (generally within 30 days) after any material changes throughout the year.

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Item 4 – Advisory Business

millionaireME wealth management is an internet only investment advisor. The firm was registered in 2019 and provides a risk-based discretionary platform of no transaction fee Mutual Funds and Exchange Traded Funds (ETFs) primary to individuals and high net worth individuals.

Jon C. Goodman is the Founder, CEO and Chief Compliance Officer as well as an Investment Advisor Representative (IAR) with over 10 years of experience. He holds the Certified Private Wealth Advisor[®] (CPWA[®]) designation from the Investment Management Consultants Association (IMCA) offered in conjunction with the University of Chicago Booth School of Business and earned his B.A. in English from Duke University.

Mr. Goodman also holds a Master of Arts in Liberal Studies (MALS) in Religious Studies from Georgetown University, an Online Writing Certificate from Stanford University, and his FINRA 66 licenses. Mr. Goodman is also a licensed insurance agent.

- millionaireME wealth management does not provide accounting or legal advice. Clients should seek the advice of legal counsel or an accountant regarding the tax or legal implications of an investment or trading strategy.
- millionaireME does not directly hold securities or have direct access to client assets. The firm has a custodial relationship for the safekeeping of client assets.
 - millionaireME wealth management and the custodian are separate and unaffiliated legal entities.

Conflicts of Interest

millionaireME wealth management must fully disclose all material facts concerning any conflict of interest and must abide by honest and ethical business practices.

- Jon C. Goodman is an investment advisor representative of millionaireME and also JCG Advisors, LLC (CRD No. 283746). JCG Advisors, LLC provides comprehensive asset management and financial planning that is not exclusive to the internet. Both firms are owned and operated by Mr. Goodman.
- Jon C. Goodman is the only Investment Advisor Representative and serves as the Chief Compliance Officer for both millionaireME wealth management and JCG Advisors, LLC.
- Jon C. Goodman owns and operates an investment realted App “millionaireME” that is designed to calculate the potential investment value of the price difference between competing consumer goods.
- Jon C. Goodman is the Managing Partner and insurance agent of JCG Life/Health/DI (“JCG Life”). He is appointed with multiple insurance carriers to sell insurance products for a commission.

- Jon C. Goodman is the Managing Member of JCG CTA, LLC (“JCG CTA”). JCG CTA is exempt from registration as a commodity trading adviser with the National Futures Association (“NFA”) and is currently not involved in trading futures. Clients of JCG RIA are not solicited to trade futures through JCG CTA.
- Product sponsors may pay or reimburse millionaireME wealth management for the costs associated with, education or training events.

Such conflicts of interest are mitigated by a fiduciary duty to act in a client’s best interest.

The firm currently has the following assets under management:

Regulatory Asset under Management	
Discretionary	\$0.00

Item 5 – Fees and Compensation

For account under \$10,000, millionaireME does not charge a fee but Betterment charges 0.25% fee. For accounts over \$10,000, millionaireME charges a fee of 0.74% and Betterment charges a .25% asset management fee in addition to asset management fee charged by millionaireME for a total asset management fee of 0.99%. Fees are not negotiable.

Investment Amount	millionaireME	Betterment	Total
Up to \$10,000	0.00%	0.25%	0.25%
Over \$10,000	0.74%	.025%	0.99%

Termination and Refunds

An asset management agreement continues until the client or millionaireME wealth management decides to terminate it. Either party may terminate the account upon written notice. If the advisory agreement is terminated before the end of the quarterly period, clients are subject to a refund of unearned fees.

Wrap Fee Program

A wrap fee program is a comprehensive advisory account with a single fee that covers a bundle of services; such as, portfolio management, advice, and investment research as well as trade execution, custody and reporting fee. The fee is not based directly upon advisory services or the execution of transactions. millionaireME does not sponsor or act as the portfolio manager for a wrap fee program.

Other Types of Fees & Expenses

Clients pay charges imposed directly by the selected mutual fund or exchange traded fund which shall be disclosed in the fund’s prospectus (i.e., fund management fees and other fund expenses). Clients are also subject to a custodial fee for retirement accounts ranging from \$50 to \$100 per year.

Item 6 – Performance-Based Fees and Side-By-Side Management

millionaireME wealth management does not receive a performance-based fee or participate in side-by-side management.

Item 7 – Types of Clients

millionaireME wealth management primarily provides services to individuals and high net-worth clients.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

The methods of analysis include a combination of the following:

Behavioral Analysis

Behavioral analysis involves an examination of conventional economics as well as behavioral and cognitive psychological factors. Behavioral finance methodology seeks to combine a qualitative and quantitative approach to provide explanations for why individuals may, at times, make irrational financial decisions. Where conventional financial theories have failed to explain certain patterns, the behavioral finance methodology investigates the underlying reasons and biases that cause some people to behave against their best interests. The risks relating to behavior finance analysis are that it relies on spotting trends in human behavior that may not predict future trends.

Charting Analysis

Charting analysis utilizes various market indicators as investment selection criteria. These criteria are generally pricing trends that may indicate movement in the markets. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the technical and charting analysis may lose value and may have negative investment performance. The Advisor monitors these market indicators to determine if adjustments to strategic allocations are appropriate.

Cyclical Analysis

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 MillionaireME Wealth Management, LLC is may recommend or implementing. The risks with cyclical analysis are similar to those of technical analysis.

Fundamental Analysis

Fundamental analysis utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will

increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Technical Analysis

Technical analysis involves the analysis of past market data rather than specific company data in determining the may recommend or implementations 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 MillionaireME Wealth Management, LLC will be able to accurately predict such a reoccurrence.

Investment strategies include:

Accumulation Strategies

Portfolios focused on total return - growth of value through interest, capital gains, and dividends proportionate to a client's risk profile. The portfolios are designed to seek intermediate and long-term capital appreciation and actively adjusted to take advantage of opportunities in the market.

Income Strategies

Portfolios that seek consistent, reliable distributions from a variety of traditional and non-traditional income-producing assets from around the globe that offer income opportunities consistent with a client's risk profile.

Protection Strategies

Portfolios that pursue capital growth during sustained market uptrends, yet seek protection of assets during market downturns. The portfolios seek long-term growth as well as protection of principal consistent with a client's lower risk profile and/or shorter time horizon.

Tax Managed Strategies

Portfolios that seek capital appreciation while keeping annual net taxable gains low. The portfolios are designed to seek to tax efficiency.

Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Below is a list of risks that should be considered prior to investing. Additional unforeseen risks may apply and affect investment performance.

- **Acts of God** – A natural and unavoidable catastrophe that interrupts the expected course of events, market structure and access to funds.
- **Allocation Risk** - The allocation of investments among different global asset classes may have a significant effect on your portfolio's value, when one of these asset classes is performing more poorly than others. As both the direct investments and derivative positions will be periodically adjusted to reflect our view of market and economic conditions, there will be transactions costs which may be, over time, significant. In addition, there is a risk that certain asset allocation decisions may not achieve the desired results and, as a result, your portfolio may incur significant losses.
- **Business Risk** – The measure of risk associated with a particular security. It is also known as unsystematic risk and refers to the risk associated with a specific issuer of a security. Generally speaking, all businesses in the same industry have similar types of business risk. More specifically, business risk refers to the possibility that the issuer of a particular company stock or a bond may go bankrupt or be unable to pay the interest or principal in the case of bonds.
- **Call Risk** – The risk specific to bond issues and refers to the possibility that a debt security will be called prior to maturity. Call risk usually goes hand in hand with reinvestment risk because the bondholder must find an investment that provides the same level of income for equal risk. Call risk is most prevalent when interest rates are falling, as companies trying to save money will usually redeem bond issues with higher coupons and replace them on the bond market with issues with lower interest rates.
- **Company Specific Risk** – An unsystemic risk specific to a certain company's operations, executive decisions and reputation which is difficult to quantify
- **Concentration Risk** – Concentrated portfolios are an aggressive and highly volatile approach to trading and investing and should be viewed as complementary to a stable, highly predictable investment approach. Concentrated portfolios hold fewer different stocks than a diversified portfolio and are much more likely to experience sudden dramatic price swings. In addition, the rise or drop in price of any given holding in the portfolio is likely to have a larger impact on portfolio performance, than a more broadly diversified portfolio.
- **Credit Risk** – The risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.
- **Currency/Exchange Rate Risk** – The risk of a change in the price of one currency against another.
- **Interest Rate Risk** – The risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more sensitive to changes

in interest rates than a bond or bond fund with a shorter duration.

- **Investment Company and Exchange Traded Fund Risk.** Some of our strategies allow for investments in investment companies (also known as mutual funds) and exchange traded funds (“ETF”). An investment in an investment company or ETF involves substantially the same risks as investing directly in the underlying securities. An investment company or ETF may not achieve its investment objective or execute its investment strategy effectively, which may adversely affect your portfolio’s performance. Your portfolio must pay its pro rata portion of an investment company’s or ETF’s fees and expenses. Shares of a closed-end investment company or ETF may trade at a premium or discount to the net asset value of its portfolio securities.
- **Inflationary Risk** – The risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **Legislative Risk** – The risk of a legislative ruling resulting in adverse consequences.
- **Liquidity Risk** – The possibility that an investor may not be able to buy or sell an investment as and when desired or in sufficient quantities because opportunities are limited.
- **Market Risk** – The risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries. This is a risk that will affect all securities in the same manner caused by some factor that cannot be controlled by diversification.
- **Municipal Bond Risk** – Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation or other political events that could have a significant effect on the ability of the municipality to make payments on the interest or principal of its municipal bonds. In addition, because municipalities issue municipal securities to finance similar types of projects, such as education, healthcare, transportation, infrastructure and utility projects, conditions in those sectors can affect the overall municipal bond market. Furthermore, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest will be subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of the Client’s assets or profits.
- **Real Estate Related Securities Risk** – Investing in real estate related securities includes, among others, the following risks: possible declines in the value of real estate; risks related to general and local economic conditions, including increases in the rate of inflation; possible lack of availability of mortgage funds; overbuilding; extending vacancies of properties; increases in competition, property taxes and operating expenses; changes in zoning laws; costs resulting from cleanup of, and liability

to third parties for damages resulting from environmental problems; casualty or condemnation losses; uninsured damages from floods, earth quakes or other natural disasters; limitations on and variations in rents; and changes in interest rates. Investing in Real Estate Investment Trusts (“REITs”) involves certain unique risks in addition to those risks associated with investing in the real estate industry in general. REITs are dependent upon management skills, are not diversified, and are subject to heavy cash flow dependency, default by borrowers and self-liquidation.

- **Reinvestment Risk** – The risk that falling interest rates will lead to a decline in cash flow from an investment when its principal and interest payments are reinvested at lower rates.
- **Social/Political Risk** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Taxability Risk** – the risk that a security that was issued with tax-exempt status could potentially lose that status prior to maturity. Since municipal bonds carry a lower interest rate than fully taxable bonds, the bond holders would end up with a lower after-tax yield than originally planned.
- **Terrorism Risk** – An act of terror or calculated use of violence against the country, market structure or individuals.

The firms’ methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations.

Types of Investments (Examples, not limitations)

millionaireME wealth management allocates client’s assets to help them reach their individual investment objectives within their time horizon in a manner consistent with their risk profile. millionaireME wealth management generally offers the following types of investments:

- **Cash Positions** – Based on a perceived or anticipated market conditions and/or events, certain assets may be taken out of the market and held in a defensive cash position. All cash may be included as assets subject to the agreed upon advisory fee. Other investment types may be included as appropriate for a particular client and their respective trading objectives. millionaireME wealth management generally invest client’s cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve a reasonable return on our client’s cash balances through relatively low-risk conservative investments.
- **Exchange Traded Funds (ETFs)** – An ETF is a portfolio of securities invested to track a market index similar to an index mutual fund, but the shares are traded on an exchange like an equity. An ETF share price fluctuates intraday depending on market conditions instead of having a net asset value (NAV) that

is calculated once at the end of the day. The shares may trade at a premium or discount; and as a result, investors pay more or less when purchasing shares and receive more or less than when selling shares. The supply of ETF shares is regulated through a mechanism known as creation and redemption that involves large specialized investors, known as authorized participants (APs). Authorized participants are large financial institutions with a high degree of buying power, such as market makers, banks or investment companies that provide market liquidity. When there is a shortage of shares in the market, the authorized participant creates more (creation). Conversely, the authorized participant will reduce shares in circulation (redemption) when supply falls short of demand. Multiple authorized participants help improve the liquidity of a particular ETF and stabilize the share price. To the extent that authorized participants cannot or are otherwise unwilling to engage in creation and redemption transactions, shares of an ETF tend to trade at a significant discount or premium and may face trading halts and delisting from the exchange.

- **Mutual Funds** – A pool of funds collected from many investors for the purpose of investing in securities such as stocks, bonds, money market instruments and similar assets.
 - **Open-End Mutual Funds** – A type of mutual fund that does not have restrictions on the amount of shares the fund will issue and will buy back shares when investors wish to sell. Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature
 - **Closed-End Mutual Funds** – A type of mutual fund that raises a fixed amount of capital through an initial public offering (IPO). The fund is then structured, listed and traded like a stock on a stock exchange. Clients should be aware that closed-end funds available within the program are not readily marketable. To provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
 - **Alternative Strategy Mutual Funds** – Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund’s concentration in the real estate industry.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks

with the Advisor.

Item 9 – Disciplinary Information

millionaireME wealth management is obligated to disclose any disciplinary event that would be material when evaluating a client/adviser relationship. There are no such legal or disciplinary events required to be disclosed.

Item 10 – Other Financial Industry Activities and Affiliations

Jon C. Goodman has another financial industry activity as an insurance agent. He is appointed with multiple insurance carriers to sell insurance products for a commission.

Jon C. Goodman is also an investment advisor representative and owner of JCG Advisors, LLC (CRD No. 283746). JCG Advisors, LLC provides comprehensive asset management and financial planning that is not exclusive to the internet. In addition, Mr. Goodman owns and operates an investment related App named “millionaireME” that is designed to calculate the potential investment value of the price difference between competing consumer goods. The millionaireME App is not a registered investment adviser and operates independently of millionaireME wealth management.

Jon C. Goodman is the Managing Member of JCG CTA, LLC (“JCG CTA”). JCG CTA is exempt from registration as a commodity trading adviser with the National Futures Association (“NFA”) and is currently not involved in trading futures. Clients of JCG RIA are not solicited to trade futures through JCG CTA.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

In order to address conflicts of interest, millionaireME wealth management has adopted a code of ethics (the “Code”). A copy of the Code is available to any client or prospective client, free of charge, upon request. The Adviser’s Code provides the following:

- A standard (or standards) of business conduct that reflect the adviser’s fiduciary obligations.
- Provisions requiring compliance with applicable federal securities laws.
- Provisions that require all “access persons” to report their personal securities transactions and holdings.
- Provisions requiring supervised persons to report any violations of the code of ethics promptly to the Chief Compliance Officer.
- Provisions requiring the firm to provide a copy of the code of ethics and any amendments to all covered persons.

- Provisions requiring all covered persons to provide the firm with a written acknowledgment of their receipt of the code and any amendments.
- The Code of Ethics permits covered persons to invest for their own personal accounts in the same or different securities than clients.
- Neither millionaireME wealth management nor a related person recommends to clients, or buys or sells for client accounts, securities in which they or a related person has a material financial interest.

A fiduciary duty is considered the core underlying principle for a Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. All business must be conducted with the highest level of ethical standards and to comply with all federal and state securities laws at all times.

Item 12 – Brokerage Practices

millionaireME wealth management does not maintain discretionary authority in determining the broker/dealer with whom orders for the purchase and sale of securities are placed for execution or the commission rates.

Client assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. The qualified custodian used by millionaireME is MTG, LLC dba Betterment Securities (“Betterment Securities”), a unaffiliated FINRA/SIPC member broker/dealer. Client assets will be held in a Betterment Securities brokerage account, opened by separate agreement.

- Betterment Securities does not charge separately for custody/brokerage services, but is compensated as part of the Betterment for Advisors platform fee charged as a percentage of assets that includes custody, brokerage, and sub-advisory services.
- Betterment Securities serves as broker-dealer to Betterment for Advisors, an investment and advice platform serving independent investment advisory firms like millionaireME (“Betterment for Advisors”).
- Betterment for Advisors makes available various support services which may not be available to Betterment’s retail customers to help millionaireME manage or administer accounts, while others help us manage and grow our business.
- Betterment for Advisors’ support services are generally available on an unsolicited basis and at no charge to millionaireME, including:
 - Access to a globally diversified, low-cost portfolio of ETFs, execution of securities transactions, and custody of client assets through Betterment Securities.

- A series of model portfolios created by third-party providers are also available on the platform.
- Betterment for Advisors provides service to millionaireME to help the firm manage and administer clients' accounts, such as software and technology, back-office functions, recordkeeping, and reporting, access to client account data as well as pricing and other market data.
- Betterment for Advisors offers other services intended to help millionaireME with business development efforts and operational management.
 - Technology Consulting
 - Business Consulting
 - Industry publications
 - Practice management
 - Business succession.

The availability of these services from Betterment for Advisors benefits millionaireME because the firm does not have to produce or purchase them. These services may be contingent upon committing a certain amount of business to Betterment Securities in assets in custody. The receipt of such services creates a conflict of interest that is mitigated by the firm's fiduciary duty to act in a client's best interest.

Trading Practices

Assets managed by millionaireME using the Betterment for Advisors platform are subject to the trading policies and procedures established by Betterment. These policies and procedures limit millionaireME's ability to control, among other things, the timing of the execution of certain trades (including in response to withdrawals, deposits, or asset allocation changes) within a client account. Clients should not expect that trading on Betterment is instant, and, accordingly, should be aware that Betterment does not permit clients or millionaireME to control the specific time during a day that securities are bought or sold in your account (i.e., to "time the market").

- Betterment generally trades on the same business day as it receives instructions. However, transactions will be subject to processing delays in certain circumstances. In particular, orders initiated on non-business days and after markets close generally will not transact until the next business day.

- Betterment maintains a general approach of not placing securities orders during approximately the first thirty minutes after the opening of any market session.
- Betterment generally stops placing orders arising from allocation changes in existing portfolios approximately thirty minutes before the close of any market session.
- Betterment continues placing orders associated with deposit and withdrawal requests until market close.
- Betterment maintains a general approach of not placing orders around the time of scheduled Federal Reserve interest rate announcements.
- Betterment may delay or manage trading in response to market instability.

Additional information about the Betterment trading practices are disclosed in the Betterment LLC Form ADV Part 2A.

Best Execution

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 broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness.

Accordingly, although we will seek competitive rates, for the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Our recommendations to our clients are based on our clients' interests in receiving best execution and the level of competitive, professional services.

Trade Aggregation

millionaireME does aggregate orders among all client accounts. Clients will share commission and transactions costs equally and receive securities at a total average price. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Some clients may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.

Soft Dollar

Under "soft dollar" arrangements, brokerage firms provide or pay the costs of certain services, equipment or other items. millionaireME wealth management does not receive any soft dollar support. However, millionaireME wealth management receives certain benefits from the custodian of client assets that includes some or all of the following: discounts on compliance, marketing, technology, and practice management products or services provided by third party vendors.

The benefits received are not considered “soft dollar” because they do not depend on the amount of brokerage transactions; however, millionaireME wealth management has an incentive because of these benefits which is a conflict of interest. This conflict of interest is mitigated by the fiduciary duty to act in a client’s best interest,

Item 13 – Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Goodman as the Chief Compliance Officer. Reviews are generally conducted at least annually or more frequently as needed. The surveillance process focuses on accounts that have potential issues in the following areas: Market Performance

- Trading Inactivity
- High Cash Balance
- Position Concentration
- Asset Allocation
- Risk Tolerance
- Senior Suitability

Causes for Reviews

In addition to the investment monitoring noted above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account. The Client is encouraged to notify the firm if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s].

Item 14 – Client Referrals and Other Compensation

millionaireME receives non-economic benefits from Betterment for Advisors and Betterment Securities in the form of support products and services. The products and services are not based on particular investment advice that would otherwise create a conflict of interest.

millionaireME wealth management could also receive an occasional economic benefit from a product sponsor that is not based on advisory services. Compensation could include promotional gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings, workshops or marketing event.

Referral Fees

millionaireME wealth management does not directly or indirectly compensate any person for client referrals.

Item 15 – Custody

millionaireME wealth management does not have actual custody of client funds; however, the firm will be deemed to have custody if a client authorizes millionaireME to instruct the custodian to deduct advisory fees directly from the assets under management.

Betterment Securities maintains actual custody of client assets and provides statements at least quarterly to clients showing all disbursements including the amount of the advisory fees paid to advisor, the value of client assets upon which advisor's fee was based, and the specific manner in which advisor's fee was calculated. Client statements will be available for review on the "activity section" of the Betterment for Advisors account portal. Clients will also receive account statements directly from Betterment Securities at least quarterly at www.bettermentsecurities.com.

- Payment of fees may result in the liquidation of a client's positions if there are insufficient funds in the account.
- Fees are assessed on all assets in the account(s), including securities, cash or money market balances.
- Margin debits do not reduce the value of the assets in the account for billing purposes.

Clients should review the fee calculated and deducted by the custodian to ensure that the fees were calculated correctly.

Item 16 – Investment Discretion

millionaireME wealth management receives discretionary authority to select the security and amount to be bought or sold. Such discretion is to be exercised in a manner consistent with the stated investment objectives for the account. When selecting securities and determining amounts, millionaireME wealth management observes the investment policies, limitations, and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to millionaireME wealth management in writing.

millionaireME wealth management does not maintain non-discretionary accounts.

Item 17 – Voting Client Securities

millionaireME wealth management does not vote, nor advise clients how to vote, proxies for securities. Clients retain the right to vote the proxies of shares held in their accounts. millionaireME wealth management will not take any action or render any advice with respect to any securities held in any accounts that are named in or

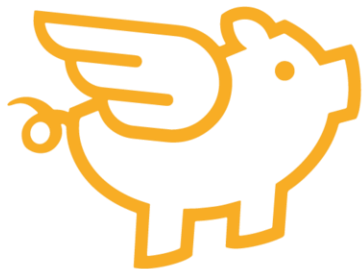
subject to class action lawsuits.

Item 18 – Financial Information

millionaireME wealth management does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time has millionaireME wealth management been the subject of a bankruptcy petition.

Item 1 - Cover Page

Registered as JCG Consulting, Inc. | Doing Business as: millionaireME wealth management



millionaire
ME

wealth management

Jon C. Goodman

Form ADV 2B – Individual Disclosure Brochure
President, Chief Compliance Officer & Investment Advisor Representative
CRD No. 5065832

5 West Mendenhall Street
Bozeman, MT 59715

March 20, 2020

This Brochure Supplement provides information about the qualifications of Wes McCrimmon, the Investment Adviser Representative of Jon C. Goodman RIA, LLC ("JCG RIA" or the "Firm"). If you have any questions about the contents of this brochure, please contact us at (406) 600-8584 or jcg@jonegoodman.com. Additional information about the Firm's Investment Adviser Representatives also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Jon C Goodman's CRD number is 5065832.

Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Jon C. Goodman

Year of birth: **1967**

Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

- Duke University- Bachelor of Arts in English
- Georgetown University- Master of Arts in Liberal Studies
- Stanford University- Online Writing Certificate Program
- University of Chicago Booth School of Business/IMCA- Certified Private Wealth Advisor® Designation

Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

Certified Private Wealth Advisor® (CPWA®)

This designation is from the Investment Management Consultants Association (IMCA) offered in conjunction with the University of Chicago Booth School of Business, making him the first and only CPWA® professional in the Greater Yellowstone/Grand Teton region. IMCA authorizes the use of the certification mark, CPWA®, to individuals who have met rigorous experience and ethical requirements, have successfully completed graduate level coursework, and have passed the CPWA® examination. The CPWA® certification process includes a challenging educational program focused on advanced wealth management topics, including tax, retirement, and estate planning, charitable giving techniques, portfolio management, asset protection, closely held business solutions, executive stock option and deferred compensation strategies, and behavioral finance.

Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

millionaireME wealth management

President, Chief Compliance Officer and IAR

12/2018 – Present

millionaireME - App

Owner; CEO and Founder

December 2018 - Present

Jon C. Goodman RIA, LLC

Owner, CEO, CCO and IAR

July 2016 - Present

Managing Member

JCG CTA, LLC

July 2016 – Present

Managing Member

JCG Life/Health/DI

October 2016 – Present

Investment Advisor Representative

Independent Financial Partners

October 2011- June 2016

Registered Representative

LPL Financial

October 2011 – June 2016

Investment Advisor Representative

Investment Centers of America

February 2010 - October 2011

Principal, Software Designer

Little Cloud LLC

October 2007 – February 2010

Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at www.adviserinfo.sec.gov and disciplinary history could be obtained from the Securities Division of the Commonwealth of Massachusetts.

Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is

disclosed below.

- Jon C. Goodman is an investment advisor representative of millionaireME and also JCG Advisors, LLC (CRD No. 283746). JCG Advisors, LLC provides interactive asset management and financial planning that is not exclusive to the internet. Both firms are owned and operated by Mr. Goodman.
- Jon C. Goodman owns and operates an investment realted App “millionaireME” that is designed to calculate the potential investment value of the price difference between competing consumer goods.
- Jon C. Goodman is an insurance agent and appointed with multiple insurance carriers to sell insurance products for a commission.
- Jon C. Goodman is the Managing Member of JCG CTA, LLC (“JCG CTA”) and JCG Life/Health/DI (“JCG Life”). JCG CTA is exempt from registration as a commodity trading adviser with the National Futures Association (“NFA”) and is currently not involved in tradng futures. Clients of JCG RIA are not solicited to trade futures through JCG CTA.

Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person’s regular salary, if any.

Mr. Goodman receives compensation from the additional business activities listed in Item 4. Jon C. Goodman does not receive any other regular compensation. However, he may receive compensation from product sponsors such as promotional gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives.

Item 6 – Supervision

This section explains how millionaireME wealth management supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

millionaireME wealth management maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Jon C. Goodman is the sole Investment Advisor Representative and also serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of controls.

Item 1 - Cover Page

Registered as JCG Consulting, Inc. | Doing Business as: millionaireME wealth management



millionaire
ME

wealth management

Wes McCrimmon

Investment Advisor Representative
Form ADV 2B – Individual Disclosure Brochure
CRD No. 5565324

5 West Mendenhall Street | Bozeman, MT 59715

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Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Wes McCrimmon

Year of birth: **1982**

Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

- University of Idaho, BS Finance (2005)

Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

MillionaireME

Investment Advisor Representative

September 2019 – Present

Jon C. Goodman RIA, LLC

Investment Advisor Representative

August 2019 – Present

LPL Financial, LLC

Investment Advisor Representative

June 2017 – August 2019

NCompass Partners

Recruiter

February 2016 – May 2017

Unemployed

August 2015 – February 2016

Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person. There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at www.adviserinfo.sec.gov.

Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

- Wes McCrimmon is an insurance agent and appointed with multiple insurance carriers to sell insurance products for a commission.

Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Wes McCrimmon receives compensation from the additional business activities listed in Item 4.

Wes McCrimmon does not receive any other regular compensation. However, he may receive compensation from product sponsors such as promotional gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives.

Item 6 – Supervision

This section explains how millionaireME supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

millionaireME maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Jon C. Goodman serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of controls.

Privacy Policy - Effective: March 20, 2020

Our Commitment to You

millionaireME wealth management (the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”). millionaireME wealth management does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. millionaireME wealth management does not share non-public personal information with non-affiliated third parties unless a client specifically consents to the disclosure. Any such sharing would require an "opt-in" to obtain a signed statement making an affirmative declaration of permission to disclose such information. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver’s license number	Date of birth
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 Information do we collect from other sources?

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 do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client’s personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, consultants and other financial institutions) as necessary for us to provide agreed upon 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.	Yes	No
Marketing Purposes millionaireME wealth management 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 millionaireME wealth management 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.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients millionaireME wealth management 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.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this 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.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (406) 600-8584 or jcg@MYmillionaireMe.com.