



Firm Brochure- Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Signify Wealth. If you have any questions about the contents of this brochure, please contact us at (314) 222-0295 or by email at: info@signifywealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Signify Wealth is also available on the SEC's website at www.adviserinfo.sec.gov. Signify Wealth's CRD number is: 160094

7750 Clayton Road Suite 100
St. Louis, Missouri, 63117
(314) 222-0295
info@signifywealth.com

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

Version Date: 05/19/2020

Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Signify Wealth LLC on March 27, 2019 are described below. Material changes relate to Signify Wealth LLC's policies, practices or conflicts of interests.

- Signify Wealth LLC has updated Items 11 and 12.
- Signify Wealth LLC has updated Item 15.
- Signify Wealth LLC has updated Item 10.

Front Page

- Updated Primary Office Address

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Item 4: Advisory Business

A. Description of the Advisory Firm

Signify Wealth is a Limited Liability Company organized in the state of Missouri.

This firm has been in business since December 2011, and the principal owner is Stephen P. Rhodes.

B. Types of Advisory Services

Signify Wealth (hereinafter “SW”) offers the following services to advisory clients:

Investment Supervisory Services

SW offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. SW creates an Investment Policy Statement for each client, which outlines the client’s current situation and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

SW evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. SW will request either discretionary or non-discretionary authority from clients in order to select securities and execute transactions. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Selection of Other Advisers

SW may direct clients to third party money managers (TPAMs). The client will sign an agreement with each TPAM and TPAMs will deduct their management fees directly from the Advisory Client's account(s) with written authorization from the client. Fees are deducted or billed quarterly in advance. SW will always act in the best interests of the client, including when determining which third party manager to recommend to clients. In addition, SW will determine if the third party manager is properly licensed, notice filed or exempt from registering with the department prior the manager to any SW clients.

Financial Planning/Consulting Services

Financial plans and financial planning may include, but are not limited to: investment planning, life insurance; tax concerns; retirement planning; college planning; and debt/credit planning. SW also offers financial planning to employer 401k plans. These services are based on either a fixed fee or hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

Wealth Management Services

Wealth Management Services may include, but are not limited to: life insurance, tax concerns, retirement planning, college planning, cash flow planning, and debt/credit planning. These services are based on assets under management and the final full list of services is documented in Exhibit V of the Investment Advisory Contract.

Services Limited to Specific Types of Investments

SW generally limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, ETFs, and insurance products including annuities. SW may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

SW offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. SW DOES NOT participate in any wrap fee programs.

E. Amounts Under Management

As of December 2019, SW manages approximately \$146,923,575 in assets at the time of filing with a total of 229 accounts. Specifically:

	<u>US Dollars</u>	<u>Number of Accounts</u>
Discretionary:	\$ 140799309	252
Non-Discretionary	\$ 6124266	3

Item 5: Fees and Compensation

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
\$25,000 - \$2,000,000	1.00%
\$2,000,001 - \$5,000,000	0.75%
Above \$5,000,000	0.50%

These fees are negotiable depending upon the needs of the client and complexity of the situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid quarterly in advance and withdrawn directly from the client's account with client written authorization.

Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. At any point, clients can terminate their contract with written notice. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days remaining in the quarter including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

If assets in excess of \$10,000 are deposited into or withdrawn from the managed account after the inception of a quarter, the fee payable or the refund for that quarter with respect to such assets will be prorated. The amount to be billed or refunded will be the daily rate*

times the number of days remaining in the quarter. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the quarter).

Selection of Other Advisers Fees

SW may direct clients to third party money managers (TPAMs). The client will sign an agreement with each TPAM and TPAMs will deduct their management fees directly from the Advisory Client's account(s) with written authorization from the client. Fees are deducted or billed quarterly in advance. SW will always act in the best interests of the client, including when determining which third party manager to recommend to clients. The combination of fees for SW and others advisors will not exceed the industry standard of excessive fees, which is 3%.

Financial Planning/Consulting Fees

Fixed Fees

Depending upon the complexity of the situation and the needs of the client, the rate for creating client financial plans is between \$1,000 and \$20,000. Fees are paid in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning/Consulting Agreement. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

Min Annual Fee is \$1,000. This amount will be paid bill quarterly (invoice will be provided) and maybe either automatically deducted from client's Schwab account or paid via check.

The fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

Hourly Fees

Depending upon the complexity of the situation and the needs of the client, the hourly fee for these services is between \$100 and \$300. The fees are negotiable and the final fee schedule will be attached as Exhibit II of the Financial Planning/Consulting Agreement. Fees are paid in advance, but never more than six months in advance. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination. Clients may terminate their contracts without penalty within five business days of signing the advisory contract.

The fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

Wealth Management Fees

Total Assets Under Management	Annual Fee
\$25,000 - \$2,000,000	0.25%
\$2,000,001 - \$5,000,000	0.30%
Above \$5,000,000	0.50%

These fees are negotiable depending upon the needs of the client and complexity of the situation. Fees are paid quarterly in advance. Refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter). Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Clients may terminate their contracts with written notice. fees are withdrawn directly from the client's accounts with client written authorization.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance. SW will send invoice directly to the client and qualified custodian, explaining each fee debit. The invoice will include formula used to calculate fee, time period covered, and assets under management from which the fee is derived.

Payment of Financial Planning Fees

Hourly & Fixed Financial Planning/Consulting fees are paid in advance (but never more than six months in advance) via check or withdrawn directly from the client's accounts with client written authorization. Fees that are charged in advance will be refunded based on the prorated amount of work completed at the point of termination

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by SW. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

SW collects fees in advance. Fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination and the total days during the billing period. Fees will be returned within fourteen days to the client via check or credited to the account withdrawn.

The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination.

(*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

E. Outside Compensation For the Sale of Securities to Clients

Neither SW nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees for the sale of mutual funds, for advisory client accounts.

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

SW does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

SW generally provides investment advice and/or management supervisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Trusts, Estates, or Charitable Organizations
- ❖ Employer 401k Plans
- ❖ Employer Pension Plans

Minimum Account Size

There is an account minimum, \$25,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

SW's methods of analysis include fundamental analysis and technical analysis.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

SW uses short term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Investment Strategies

Short term trading generally holds greater risk and clients should be aware that there is a material risk of loss using this strategy.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

SW generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have costs that lower investment returns. They can be of bond “fixed income” nature (lower risk) or stock “equity” nature (mentioned above).

Equity investment generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Fixed Income is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

Stocks & Exchange Traded Funds (ETF): Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

Short term trading risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither SW nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither SW nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Stephen P. Rhodes is an owner of Promise Properties which he oversees his personal rental properties.

Stephen P. Rhodes is a Board member at Mission St. Louis. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. Signify Wealth LLC always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any Signify Wealth LLC representative in such individual's outside capacities.

Stephen P. Rhodes is the owner of Katalysis Ventures LLC, a holding company for his personal private investments. His responsibilities include analyzing and overseeing private investment. 2 hours and month during and outside of trading hours are spent on this activity. 0 yearly compensation is expected to be derived from the business.

Stephen P. Rhodes is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company and its representatives, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of SW are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. SW addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. SW periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. SW will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or

services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by SW's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

SW may direct clients to third party money managers (TPAMs). The client will sign an agreement with each TPAM and TPAMs will deduct their management fees directly from the Advisory Client's account(s) with written authorization from the client. Fees are deducted or billed quarterly in advance. SW will always act in the best interests of the client, including when determining which third party manager to recommend to clients.

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

A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Record keeping, Annual Review, and Sanctions. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

SW does not recommend that clients buy or sell any security in which a related person to SW or SW has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of SW will buy or sell securities for themselves that are also recommend to clients. This could provide an opportunity for representatives of SW to buy or sell the same securities as part of a block trade, as described in Item 12B below, with clients. In some cases, such transactions create a conflict of interest. SW will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of SW will buy or sell securities for themselves that are also recommend to clients. This could provide an opportunity for representatives of SW to buy or sell the same securities as part of a block trade, as described in Item 12B below, with clients. In some cases, such transactions create a conflict of interest. SW will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian and Brokers We Use

SW (“we/our”) does not maintain custody of your assets that we manage (although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We require that our clients use Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use Schwab as custodian/broker, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account, as described in the next paragraph.

How We Select Brokers/Custodians

We seek to require a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services

- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us from Schwab”)

Your Custody and Brokerage Costs

For our clients’ accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. This commitment benefits you because the overall commission rates or asset-based fees you pay are lower than they would be if we had not made the commitment. In addition to commissions [or] asset-based fees Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

Products and Services Available to Us from Schwab

Schwab Advisor Services is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as we

keep a total of at least \$10 million of our clients' assets in accounts at Schwab. If we have less than \$10 million in client assets at Schwab, it may charge us quarterly service fees. Here is a more detailed description of Schwab's support services:

Services that Benefit You. Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide pricing and other market data;
- facilitate payment of our fees from our clients' accounts; and
- assist with back-office functions, record keeping and client reporting.

Services that Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- educational conferences and events
- technology, compliance, legal, and business consulting;

- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Our Interest in Schwab's Services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services so long as we keep a total of at least \$10 million of client assets in accounts at Schwab. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to require that you maintain your account with Schwab based on our interest in receiving Schwab's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. It is primarily supported by the scope, quality and price of Schwab's services (based on the factors discussed above – see "How We Select Brokers/Custodians) and not Schwab's services that benefit only us. We have over \$10 million in client assets under management, and do not believe that maintaining at least \$10 million of those assets at Schwab in order to avoid paying Schwab quarterly service fees presents a material conflict of interest.

B. Aggregating (Block) Trading for Multiple Client Accounts

If SW buys or sells the same securities on behalf of more than one client (including representatives of SW), it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased

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or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, SW would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SW would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with SW's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed on a quarterly basis by either Stephen P. Rhodes, or by the Adviser assigned to the account.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Stephen P. Rhodes, Managing Member. There is only one level of review and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least quarterly from the custodian, a written report that details the client's account including assets held and asset value which will come from the custodian.

Clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

SW does not receive any economic benefit by third parties for advice rendered to clients. All Charles Schwab benefits are listed above in section 12A.

B. Compensation to Non –Advisory Personnel for Client Referrals

SW does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When it deducts fees directly from client accounts at a selected custodian, SW will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

SW may also be deemed to have custody over the funds and securities of trust accounts for which it or its related persons serve in a capacity to assist clients with various financial transactions. SW will follow custody rules for the accounts and clients for which SW has bill pay authority. As some arrangements fall outside the scope of a SLOA (standing letter of authorization) SW will not follow the steps set forth in the SEC guidance issued in February 2017.

Item 16: Investment Discretion

For those client accounts where SW provides ongoing supervision, the client has given SW written discretionary authority over the client's accounts with respect to securities to be bought or sold and the amount of securities to be bought or sold. Details of this relationship are fully disclosed to the client before any advisory relationship has commenced. The client provides SW discretionary authority via a limited power of attorney in the Investment Advisory Contract and in the contract between the client and the custodian.

Item 17: Voting Client Securities (Proxy Voting)

SW will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

SW does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither SW nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Neither SW nor one associated has file bankruptcy petitions in the previous 10 years.