

---

**Item 1 – Cover Page**

---

Registered as JCG Consulting, Inc.

Doing Business as: millionaireWE wealth management & glidePATH Advisory Partners



389 South Ferguson, Suite 219 | Bozeman, MT 59718

**April 28, 2021**

## Form ADV 2A – Firm Disclosure Brochure

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of millionaireWE wealth management (“the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (406) 600-8584 or [support@millionaireWE.com](mailto:support@millionaireWE.com). millionaireWE 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 millionaireWE wealth management to assist you in determining whether to retain the Advisor. Additional information about millionaireWE wealth management and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://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 31<sup>st</sup> and promptly (generally within 30 days) after any material changes throughout the year.

---

**Item 3 -Table of Contents**

---

Item 1 – Cover Page .....	1
Item 2 – Material Changes .....	2
Item 3 – Table of Contents .....	3
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation .....	6
Item 6 – Performance-Based Fees and Side-By-Side Management.....	7
Item 7 – Types of Clients .....	7
Item 8 – Methods of Analysis, Investment Strategies, and Risk of Loss .....	8
Item 9 – Disciplinary Information .....	14
Item 10 – Other Financial Industry Activities and Affiliations .....	14
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	14
Item 12 – Brokerage Practices .....	15
Item 13 – Review of Accounts .....	19
Item 14 – Client Referrals and Other Compensation .....	20
Item 15 – Custody .....	21
Item 16 – Investment Discretion .....	21
Item 17 – Voting Client Securities .....	22
Item 18 – Financial Information .....	22
Privacy Policy .....	23

---

#### Item 4 – Advisory Business

---

millionaireWE 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<sup>®</sup> (CPWA<sup>®</sup>) 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.

- millionaireWE 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.
- millionaireWE does not directly hold securities or have direct access to client assets. The firm has a custodial relationship for the safekeeping of client assets.
  - millionaireWE wealth management and the custodian are separate and unaffiliated legal entities.

#### Betterment Advisory Services

Betterment for Advisors is a digital wealth management platform generally serving independent investment advisory firms. Betterment LLC (“Betterment”), a registered investment advisor, serves as sub-advisor to your clients (“Clients”). MTG LLC, dba Betterment Securities (“Betterment Securities”), a registered broker-dealer and member of FINRA and the SIPC, serves as broker-dealer and custodian. The services provided by Betterment include:

- **Goal-Based Investment Management:** Betterment’s goal-based investment platform allows advisors and Clients to identify multiple investment goals for each Client, each with specific portfolio allocations;
- **Portfolio Construction Tools:** Advisors and Clients have access to a set of portfolio strategies, each of which is comprised of low-cost, index-tracking exchange-traded funds or mutual funds (the latter only for advisors who are approved to construct portfolios with Dimensional Fund Advisors mutual funds), and are able to customize the risk-level for each investment goal;

- **Automated Investment Management Services:** Betterment's algorithms automate back-office tasks such as trading, portfolio management, tax loss harvesting, and account rebalancing;
- **Website and Mobile Application:** Betterment's website and mobile application provide a platform for account access and monitoring and delivery of account documentation and notices; and,
- **Advisor Dashboard:** Advisors have access to a dashboard for purposes of monitoring and managing Client accounts.

### **Schwab Advisor Services**

Schwab Advisor Services can serve as a qualified custodian for client accounts. Charles Schwab & Co., Inc. ("CS&Co") provides customers trade confirmations and quarterly statements. Schwab Advisor Services also makes available other products and services that benefit us but may not benefit client accounts. These products and services include software and other technology that provides access to account data (such as trade confirmations and account statements), facilitate trade execution, provide research, pricing information and other market data, provide electronic signature capabilities, facilitate payment of our fees from your accounts, and assist with back-office support, recordkeeping and client reporting.

The availability of the foregoing products and services is not contingent upon the firm committing to Schwab Institutional any specific amount of business (assets in custody or trading). The benefits received by millionaireWE through participation in the program do not depend on the amount of brokerage transactions directed to Schwab Institutional and are not typically construed as benefits acquired with soft dollars. As part of our fiduciary duties, we endeavor at all times to put your interests first.

### **Conflicts of Interest**

millionaireWE 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 millionaireWE and JCG RIA, LLC (CRD No. 283746). JCG RIA, 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 also serves as the Chief Compliance Officer for both millionaireWE wealth management and JCG RIA, LLC.
- Jon C. Goodman owns and operates an investment related App "millionaireME" that is designed to calculate the potential investment value of the price difference between competing consumer goods as well as help to save for an emergency fund, service debt, and invest towards long and short-term goals using an Advisor of their choice.
- 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 millionaireWE wealth management for the costs associated with, education or training events.
- Custodians may offer services intended to help millionaireWE manage and further develop business, such as access to webinars and advice about using the Advisors platform.
- custodians may offer different or expanded services in the future. These services could create an incentive for millionaireWE to recommend Clients invest through the Advisors platform.

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	\$1,964,000

## Item 5 – Fees and Compensation

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

Fees accrue daily and Betterment debits all accounts monthly in arrears.

Investment Amount	millionaireWE	Betterment	Total
Up to \$2,000,000	0.79%	.20%	0.99%
\$2 Million to \$10 Million	0.79%	.18%	0.97%
\$10 Million to \$30 Million	0.79%	.16%	0.95%
\$30 Million to \$100 Million	0.79%	.14%	0.93%
Over \$100,000,000	0.79%	.12%	0.91%

For assets held at Schwab, fees are charges monthly in arrears according to the below schedule.

Investment Amount	Fee
Up to \$1,000,000	0.99%
\$1 Million to \$5, Million	0.90%
\$5 Million to \$10 Million	0.75%
Over \$10 Million	0.60%

Accounts will only accrue fees for the days during the month when they are funded.

### **Termination and Refunds**

An asset management agreement continues until the client or millionaireWE 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. If a client transfers out mid-quarter, accrued fees will be debited for a portion of the quarter as part of the transfer out.

### **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. millionaireWE 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**

---

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

---

### **Item 7 – Types of Clients**

---

millionaireWE 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 like 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 MillionaireWE Wealth Management, LLC may recommend or implementing. The risks with cyclical analysis are like 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 what they 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 MillionaireWE 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 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 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)**

millionaireWE 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. millionaireWE 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. millionaireWE 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 like 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 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**

---

millionaireWE 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 RIA, LLC (CRD No. 283746). JCG RIA, 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 millionaireWE 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**

---

To address conflicts of interest, millionaireWE 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 millionaireWE 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 always comply with all federal and state securities laws.

---

**Item 12 – Brokerage Practices**

---

millionaireWE 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 millionaireWE are Charles Schwab & Co., Inc. and MTG, LLC dba Betterment Securities (“Betterment Securities”), an 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 millionaireWE (“Betterment for Advisors”).
- Betterment for Advisors makes available various support services which may not be available to Betterment’s retail customers to help millionaireWE 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 millionaireWE, 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 millionaireWE 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 millionaireWE 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 millionaireWE 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.

### **Betterment Brokerage Services**

Betterment Securities is responsible for execution of securities transactions and maintains custody of customer assets. Betterment Securities exercises no discretion in determining when trades are placed; it places trades only at the direction of Betterment. Clients should understand that the appointment of Betterment Securities as the broker for their accounts held at Betterment may result in their receiving less favorable trade executions than may be available through the use of broker-dealers that are not affiliated with Betterment. If your Clients do not wish to place assets with or execute trades through Betterment Securities, then Betterment cannot manage your Client accounts on the Betterment for Advisors platform. Additional information regarding Betterment Securities can be found on FINRA's BrokerCheck.

### **Products and Services available to us from Schwab**

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms. They provide access to institutional brokerage services (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. Following is a more detailed description of Schwab's support services:

- Access to a broad range of investment products
- Execution and custody of assets.
- Investment products which might not otherwise be available
- Lower minimum initial investments

Schwab offers products and services to millionaireWE that do not directly benefit clients, but these products and services assist in managing and administering accounts, such as:

- Investment research,
- 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
- Assist with back-office functions, recordkeeping, and client reporting

Schwab offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

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

The availability of these services from Schwab benefits millionaireWE because we do not have to produce or purchase them. millionaireWE does not have to pay for Schwab's services. Schwab has also agreed to provide to millionaireWE without a cost we would otherwise incur for technology, research, marketing, and compliance consulting products and services once the value of our clients' assets in accounts at Schwab reaches

\$15,000,000.00.

- These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody.
- This creates an incentive to recommend that clients maintain accounts with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay 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 conflict of interest. In some cases, the services that Schwab pays for are provided by an affiliate or by another party that has some pecuniary, financial or other interests. This creates an additional conflict of interest. This conflict of interest is mitigated by the fiduciary duty to act in a best interests.

### **Trading Practices**

Assets managed by millionaireWE using the Betterment for Advisors platform are subject to the trading policies and procedures established by Betterment. These policies and procedures limit millionaireWE'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 millionaireWE 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 is 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. millionaireWE wealth management does not receive any soft dollar support. However, millionaireWE 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, millionaireWE 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**

---

millionaireWE 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.

millionaireWE 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. Betterment receives an indirect benefit in the form of the asset-based fees.

### **Referral Fees**

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

---

### **Item 15 – Custody**

---

millionaireWE wealth management does not have actual custody of client funds; however, the firm will be deemed to have custody if a client authorizes millionaireWE 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](http://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**

---

millionaireWE 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, millionaireWE wealth management observes the investment policies, limitations, and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to millionaireWE wealth management in writing. millionaireWE wealth management does not maintain non-discretionary accounts.

Betterment uses algorithms to advise clients and manage their accounts. These algorithms are developed, overseen, and monitored by Betterment's investment advisory personnel. To use Betterment's investment services, Clients and/or millionaireWE inform Betterment of a Client's financial goals and personal information through Betterment's online applications, and Betterment's algorithm then recommends and builds a portfolio of exchange traded funds for each of the client's financial goals and account types. Each portfolio is associated with a target allocation of investment types and/or asset classes but millionaireWE can modify Betterment's initial allocation recommendation. In the absence of a contrary direction, Betterment periodically rebalances client portfolios so that in the face of fluctuating market prices each Client's portfolio remains within a range of the target allocation. Betterment also offers optional tax loss harvesting and automated asset location services.

---

**Item 17 – Voting Client Securities**

---

millionaireWE 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. millionaireWE 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.

For assets managed on the Betterment for Advisors platform, Clients delegate to Betterment the authority to receive and vote all proxies and related materials. Betterment will only vote on proxies and respond to corporate actions associated with securities that Betterment recommends be purchased for client accounts. Additional information about proxy matters is contained in Betterment's Form ADV Part 2A.

---

**Item 18 – Financial Information**

---

millionaireWE 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 millionaireWE wealth management been the subject of a bankruptcy petition.

---

**Privacy Policy - Effective: April 28, 2021**

---

**Our Commitment to You**

millionaireWE 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”). millionaireWE 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. millionaireWE 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?
<b>Servicing our Clients</b> 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
<b>Marketing Purposes</b> millionaireWE 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 millionaireWE 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
<b>Authorized Users</b> 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
<b>Information About Former Clients</b> millionaireWE 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 [support@millionaireWE.com](mailto:support@millionaireWE.com).