

Registered As: GoodLife RIA, LLC | CRD No. 311226

# GOODLIFE RIA

## Form ADV Part 2A

### Firm Disclosure Brochure

2395 Lancaster Pike | Reading, PA 19607  
(610) 898-6927

**March 22, 2022**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of GoodLife RIA (“the firm”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (610) 898-6927 or by email at [info@goodliferia.com](mailto:info@goodliferia.com). 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 the firm to assist you in determining whether to retain the firm. Additional information about GoodLife RIA is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching our CRD number 311226.

---

**Item 2 – Material Changes**

---

There have been no material changes since the initial filing on 03/18/2021.

At any time, the current Disclosure Brochure is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the firm name or CRD number 311226. A copy of this Disclosure Brochure may be requested at any time, by contacting (610) 898-6927 or by email at [info@goodliferia.com](mailto:info@goodliferia.com).

---

## 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 .....	8
Item 6 – Performance-Based Fees and Side-By-Side Management .....	11
Item 7 – Types of Clients.....	11
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss .....	11
Item 9 – Disciplinary Information .....	15
Item 10 – Other Financial Industry Activities and Affiliations .....	15
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	16
Item 12 – Brokerage Practices .....	17
Item 13 – Review of Accounts.....	20
Item 14 – Client Referrals and Other Compensation .....	21
Item 15 – Custody .....	21
Item 16 – Investment Discretion.....	22
Item 17 – Voting Client Securities.....	22
Item 18 – Financial Information .....	22
Item 19 – Requirements for State Registrations .....	23
Appendix 1 - Wrap Fee Program Brochure.....	24
Privacy Policy .....	29

---

## Item 4 – Advisory Business

---

### **Firm Information**

The firm was organized in 2020 and registered as a state level investment advisor in 2022. This disclosure brochure provides information regarding the qualifications, business practices and details of the advisory services and the applicable fees.

### **Principal Owners**

#### **Good Life Management Company 1, LLC (GLMC1)**

The firm is owned 100% by GLMC1 which is owned by C and L Holdings, LLC and the individual Investment Advisor Representatives of the firm.

### **Chief Compliance Officer**

Rachel D. Bashore, JD serves as the Chief Compliance Officer for GoodLife RIA. She is also the Chief Operating Officer for Good Life Companies, LLC located at the same address. Ms. Bashore graduated cum laude from the Pennsylvania State University Dickinson School of Law in 2006; inducted into the Woolsack Honor Society and served as a Senior Editor of the Penn State Law Review. Admitted to practice before the Pennsylvania Supreme Court and United States District Court for the Eastern and Middle Districts of Pennsylvania. She also Graduated from Drexel University with a Bachelor of Science in Design and Merchandising.

Ms. Bashore is also a member of the International Association of Privacy Professionals (IAPP), Berks County Bar Association, the Pennsylvania Bar Association. Current board member of VOiCEup Berks, Past President of the Greater Reading Young Professionals and former member of the Berks Economic Partnership Board of Directors.

### **Advisory Services Offered**

GoodLife RIA, LLC provides financial planning and fee-based investment advisory services primarily to individual Clients and high-net worth individuals. Services are also available to businesses and financial institutions. Accounts are managed based on the individual goals, objectives, time horizon, and risk tolerance of each Client. Advisory services include, but are not limited to, the following:

Financial Planning	Investment Management
<ul style="list-style-type: none"><li>• Retirement</li><li>• Education</li><li>• Estate</li><li>• Cash Flow &amp; Budgeting</li><li>• Insurance</li></ul>	<ul style="list-style-type: none"><li>• Diversified Portfolio</li><li>• Retirement Accounts</li><li>• Rebalancing<sup>1</sup></li><li>• Stock Option Planning</li><li>• Tax Planning</li><li>• Pension Analysis</li></ul>

---

<sup>1</sup> Rebalancing of accounts will only be done with prior client approval.

Investment Advisor Representatives are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a particular Client are dependent upon the Investment Advisor Representatives that are working with the Client. Investment Advisor Representatives will consider the individual needs of each Client when providing investment advice. Investment strategies and recommendations are tailored to the individual needs of each Client but generally consist of an asset allocation consistent with:

1. **Income with Capital Preservation.** Designed as a longer-term accumulation account, this investment objective is considered generally the most conservative. Emphasis is placed on generation of current income with minimal risk of capital loss. Lowering the risk generally means lowering the potential income and overall return.
2. **Income with Moderate Growth.** This investment objective emphasizes generation of current income with a secondary focus on moderate capital growth.
3. **Growth with Income.** This investment objective emphasizes modest capital growth with some focus on generation of current income.
4. **Growth.** This investment objective emphasizes achieving high long-term growth and capital appreciation. There is little focus on generation of current income.
5. **Aggressive Growth.** This investment objective emphasizes aggressive growth and maximum capital appreciation, with no focus on generation of current income. This objective has a very high level of risk and is for investors with a longer timer horizon.

At no time will GoodLife RIA, LLC accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated account pursuant to the Client investment advisory agreement on a non-discretionary basis.

- Investment advice is not limited to certain investment types.
- A minimum total investment amount of \$50,000 is generally required but, a lesser amount will be considered.
- Advisory services are tailored to the individual need of each Client.
- Clients may place reasonable restrictions on investing in certain types of securities.

#### **GoodLife RIA, LLC Wrap Fee Program**

GoodLife RIA, LLC offers a wrap fee program where the firm acts as the sponsor and portfolio manager. A

wrap fee program is an 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. Please see Appendix 1 –Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure. Depending on the anticipated level of trading, Investment Advisor Representatives of GoodLife RIA, LLC will work with each Client to determine the most cost-effective fee structure.

### **Retirement Plan Consulting Services**

Investment Advisor Representatives assist Clients that are trustees or other fiduciaries to retirement plans (“Plans”) by providing fee-based consulting and/or non-discretionary advisory services. Investment Advisor Representatives perform one or more of the following services, as selected by the Client in the Client agreement:

- Acting as a liaison between the Plan and service providers, product sponsors or vendors.
- Ongoing monitoring of investment manager(s) or investments in relation to written guidelines provided by the Client to the Investment Advisor Representative.
- Preparation of reports describing the performance of Plan investment manager(s) or investments, as well as comparing the performance to benchmarks.
- Ongoing recommendations for consideration and selection by Client about specific investments to be held by the Plan or, in the case of a participant-directed defined contribution plan, to be made available as investment options under the Plan.
- Training for the members of the Plan Committee with regard to their service on the Committee, including education and consulting with respect to fiduciary responsibilities.
- Assistance in enrolling Plan participants in the Plan, including conducting an agreed upon number of enrollment meetings. As part of such meetings, Representatives may provide participants with information about the Plan, which includes information on the benefits of Plan participation, the benefits of increasing Plan contributions, the impact of pre-retirement withdrawals on retirement income, the terms of the Plan and the operation of the Plan.
- Assistance with investment education seminars and meetings for Plan participants. Such meetings may be on a group or individual basis, and includes information about the investment options under the Plan (e.g., investment objectives, risk/return characteristics, and historical performance), investment concepts (e.g., diversification, asset classes, and risk and return), and how to determine investment time horizons and assess risk tolerance. Such meetings do not include specific investment advice about investment options under the Plan as being appropriate for a particular participant.

- Assistance at Client's direction in making changes to investment options under the Plan.
- Assistance with the preparation, distribution and evaluation of Request for Proposals, finalist interviews, and conversion support in connection with vendor analysis and service provider support.
- Preparation of comparisons of Plan data (e.g., regarding fees and services and participant enrollment and contributions) to data from the Plan's prior years and/or a benchmark group of similar plans.
- Assistance in identifying the fees and other costs borne by the Plan for, as specified by Client, investment management, record keeping, participant education, participant communication and/or other services provided with respect to the Plan.

If the Plan makes available publicly traded employer stock ("company stock") as an investment option under the Plan, Investment Advisor Representatives do not provide investment advice regarding company stock and are not responsible for the decision to offer company stock as an investment option. In addition, if participants in the Plan invest the assets in their accounts through individual brokerage accounts, a mutual fund window, or other similar arrangement, or obtain participant loans, Investment Advisor Representatives do not provide any individualized advice or recommendations to the participants regarding these decisions.

If a Client elects to engage the firm and our Investment Advisor Representatives to perform ongoing investment monitoring and ongoing investment recommendation services in the Client agreement, such services will constitute "investment advice" under Section 3(21)(A)(ii) of ERISA. Therefore, the firm and our Investment Advisor Representative will be deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of ERISA in connection with those services.

### **ERISA Fiduciary**

Services provided by an Investment Advisor Representative may be subject to the Investment Advisers Act of 1940 ("Advisers Act"), and the advisor is a fiduciary under the Advisers Act with respect to such services. If a Client elects to engage an Investment Advisor Representative to perform ongoing investment monitoring and ongoing investment recommendation services to a Plan subject to ERISA in the Client agreement, such services will constitute "investment advice" under Section 3(21)(A)(ii) of ERISA. Therefore, the Investment Advisor Representatives will be deemed a "fiduciary" as such term is defined under Section 3(21)(A)(ii) of ERISA in connection with those services.

Clients should understand that to the extent the Investment Advisor Representative is engaged to perform services other than ongoing investment monitoring and recommendations, those services are not "investment advice" under ERISA and therefore, the Investment Advisor Representative will not be a "fiduciary" under ERISA with respect to those other services. From time to time the Investment Advisor Representative may

make the Plan or Plan participants aware of other services available that are separate and apart from the services provided under Retirement Plan Consulting. Such other services may be services to the Plan, to a Client with respect to Client's responsibilities to the Plan and/or to one or more Plan participants. In offering any such services, the Investment Advisor Representative is not acting as a fiduciary under ERISA with respect to such offering of services. If any such separate services are offered to a Client, the Client will make an independent assessment of such services without reliance on the advice or judgment of the Investment Advisor Representative.

### **Retirement Plan Rollovers**

An employee generally has four (4) options for their retirement plan when they leave an employer:

1. Leave the money in his/her former employer's plan, if permitted
2. Rollover the assets to his/her new employer's plan if one is available and permitted
3. Rollover to an Individual Retirement Account (IRA), or
4. Cash out the account value, which has significant tax considerations

GoodLife RIA, LLC provides educational services pertaining to retirement plan assets that could potentially be rolled-over to an IRA managed by the firm. GoodLife RIA, LLC has an incentive to recommend such a rollover based on the compensation received, which is mitigated by the fiduciary duty to act in a Client's best interest and acting accordingly.

### **Client Account Management**

Prior to engaging GoodLife RIA, LLC to provide investment advisory services, each Client is required to enter into an investment advisory agreement with that defines the terms, conditions, authority, and responsibilities.

### **Assets Under Management**

The firm is a newly registered investment adviser. Assets under management will be amended at least annually as of December 31<sup>st</sup>.

Assets under Management	
Non-Discretionary	\$0.00
<b>Total</b>	<b>\$0.00</b>

---

## **Item 5 – Fees and Compensation**

### **Investment Management**

Fees are deducted quarterly or monthly, in advance or in arrears based on the Cycle End Account Balance or the Daily Average Balance as selected on the Asset Management Agreement.

- GoodLife RIA possesses written authorization from the client to deduct advisory fees from an account held by a qualified custodian.



- GoodLife RIA sends the qualified custodian written notice of the amount of the fee to be deducted from the client's account.
- GoodLife RIA sends the client a written invoice itemizing the fee, including any formulae used to calculate the fee, the time period covered by the fee and the amount of assets under management on which the fee was based.
- Clients will receive quarterly statements from the Custodian that provides details of the advisory fees
- The investment advisory fee in the first period of service is pro-rated from the inception date of the account[s] to the end of the first quarter.
- If the advisory agreement is terminated before the end of the billing period, Client is entitled to a pro-rated refund of any pre-paid quarterly or monthly advisory fees based on the number of days remaining in the quarter after the termination date.
- Asset management fees are exclusive of and in addition to, brokerage fees, transaction fees, and other related costs and expenses.
- The firm will not have the authority or responsibility to value portfolio securities.

Asset Management fees generally follow the below fee schedule.

Assets Under Management (\$)	Annual Rate (%)
Up to \$500,000	Up to 3.0%
500,001 to 1,000,000	Up to 2.5%
1,000,001 to 5,000,000	Up to 2.0 %
More than 5,000,000	Up to 1.5%

### **Financial Planning**

The fee for financial planning can be based on an hourly or a fixed rate depending on the nature of the planning. Fixed fees are generally paid 50% upon engagement and the balance due upon plan delivery, which may or may not be a written document. Hourly fees are generally charged as they incur.

- Hourly Fee: \$150 to \$450
- Fixed Fee: \$500 to \$10,000

The applicable fee is determined by the scope and complexity of a particular Client's financial situation as well as the amount of time and expertise required. In some cases, a fee greater or lesser than the typical fee range may be warranted.

## **Mutual Fund Share Class Disclosures**

GoodLife RIA, LLC strives to select the lowest cost share class available; however, certain mutual fund share classes charge a 12b-1 fee that generally amounts to an additional .25% expense ratio or more. The purpose of 12b-1 fees, as approved by the SEC, are to cover marketing expenses and shareholder services such as support services and “other expenses” such as legal, accounting and the administrative functions of the custodian.

When selecting a mutual fund, Investment Advisor Representatives have a fiduciary duty to choose the share class that helps manage the overall fee structure of the account. The entire fee structure includes such fees as the asset management fee, the expense ratio and ticket charges.

- Mutual funds typically offer multiple share classes, including lower-cost share classes that do not charge 12b-1 fees and are therefore usually less expensive.
- Investment Advisor Representatives will consider investing Client funds in 12b-1 fee-paying share classes even when a lower-cost share class is available as appropriate to account for the overall fee structure and tax considerations as well as attributes of a fund not available for lesser fees.

## **Compensation for Sales of Securities**

GoodLife RIA, LLC does not receive commission compensation for advisory services.

## **Other Fees and Expenses**

Clients will incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees. Also, Clients will pay the following separately incurred expenses, which we do not receive any part of: charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund’s prospectus (i.e., fund management fees and other fund expenses). If a Client’s assets are invested in mutual funds or other pooled investment products, Clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay Advisor the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, Clients could generally avoid the second layer of fees by not using the management services of GoodLife RIA, LLC and by making their own investment decisions. Further information regarding fees assessed by a mutual fund is available in the appropriate prospectus.

## **Termination**

A contract between GoodLife RIA, LLC and a Client may be cancelled at any time by either party, without penalty, by written notice to the other party. Clients will be given this brochure form ADV Part 2A, forty-eight hours in advance of signing an agreement or they will have five business days to conditionally cancel the agreement.

---

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

---

GoodLife RIA, LLC does not accept performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a Client (such as a Client that is a hedge fund or other pooled investment vehicle). GoodLife RIA, LLC also does not participate in side-by-side management, where an advisor manages accounts that are both charged a performance-based fee and accounts that are charged another type of fee, such as an hourly or flat fee or an asset-based fee.

---

**Item 7 – Types of Clients**

---

The advisory services offered by GoodLife RIA, LLC are available for individuals, individual retirement accounts (“IRAs”), banks and thrift institutions, pension and profit-sharing plans, including plans subject to Employee Retirement Income Security Act of 1974 (“ERISA”), trusts, estates, charitable organizations, state and municipal government entities, corporations and other business entities.

---

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

---

GoodLife RIA, LLC emphasizes continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds (“ETFs”), options, mutual funds and other public and private securities or investments. The Client’s individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the Client’s circumstances. Once the appropriate portfolio has been determined, it is subject to review and if necessary, rebalanced, (with client approval) based upon the Client’s individual needs, stated goals and objectives. Each Client can place reasonable restrictions on the types of investments to be held in the portfolio.

GoodLife RIA, LLC uses multiple forms of research to analyze financial data and market conditions such as the general financial health of a company, and/or the analysis of management or competitive advantages, past market data (primarily price and volume), business cycles as well as patterns and trends.

GoodLife RIA, LLC will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, GoodLife RIA, LLC will buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector, or asset class.

**Risk of Loss**

Investing in securities involves certain investment risks. Securities can fluctuate in value or lose value up to the entire principal amount invested. Clients should be prepared to bear the potential risk of loss. GoodLife RIA, LLC will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the methods of analysis help 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 these methods of analysis may lose value and may have negative investment performance. Investment Advisor Representatives monitor economic indicators to determine if adjustments to strategic allocations are appropriate.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis. The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. 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. Clients should be aware of the following types of risks that apply to investing and are encouraged to discuss the specific risks applicable to their account holdings:

- **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.
- **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.
- **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.
- **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.
- **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.
- **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.

- **Inflationary Risk** – the risk that future inflation will cause the purchasing power of cash flow from an investment to decline.
- **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.
- **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** – the possibility of nationalization, unfavorable government action or social changes resulting in a loss of value.
- **Legislative Risk** – the risk of a legislative ruling resulting in adverse consequences.
- **Currency/Exchange Rate Risk** – the risk of a change in the price of one currency against another.
- **Pandemic Risk** – Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.
- **ETF Risks, including Net Asset Valuations and Tracking Error** - ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. An ETF typically includes embedded expenses and related fees that reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Program Account's performance or an index benchmark comparison. Expenses of an ETF generally include investment adviser management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses can change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses can vary.

- **Mutual Fund Risks** – A risk exists that the investment strategies employed by the mutual funds will not meet the stated investment objectives the fund is seeking to obtain. Mutual funds may invest in equities, fixed income, derivatives, and other asset classes; the risks associated with such investments are described in the fund’s prospectus. The performance of a mutual fund may not exactly match the performance of the index or market benchmark that the fund is designed to track due to the mutual fund incurring expenses and transaction costs not incurred by any applicable index or market benchmark. Expenses can change from time to time at the sole discretion of the issuer and expenses can vary.

All investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). 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.

### **Types of Investments**

GoodLife RIA, LLC generally manages Client portfolios that consist of mutual funds, Exchange Traded Equities (ETFs) and individual securities.

- **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 Clients 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. In an effort to provide invest or 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.

- **Equity** – An investment that generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environment.
- **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. The performance of ETFs is subject to market risk, including the complete loss of principal. ETFs also have a trading risk based on cost inefficiency if the ETFs are actively traded and a liquidity risk if the ETFs has a large price spread and low trading volume. In addition, investors buying or selling shares in the secondary market pay brokerage commissions, which may be a significant proportional cost not incurred by mutual funds.

GoodLife RIA does not offer leveraged/inverse ETFs with a daily reset.

Additional types of investments will be considered per Client for asset allocation and risk management purposes.

---

### **Item 9 – Disciplinary Information**

---

There are no legal, regulatory, or disciplinary events involving GoodLife RIA, LLC or any of its Supervised Persons.

---

### **Item 10 – Other Financial Industry Activities and Affiliations**

---

#### **Broker-Dealer Affiliation**

GoodLife RIA does not have a broker/dealer affiliation.



### **Insurance Agency Affiliations**

Certain Advisory Persons are also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with GoodLife RIA, LLC. As an insurance professional, certain Advisory Persons receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by the Investment Advisor Representative in their capacity as an insurance agent.

Insurance products will not be offered to clients unless the insurance agent (s) is appropriately licensed to sell insurance products in the applicable jurisdiction.

Conflicts of interests exist because securities and insurance sales create an incentive to recommend products based on the compensation earned rather than the best interests of the Client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer.

This chart is intended to explain the potential capacity a Financial Advisor can serve, and the type of compensation received.

Capacity	Compensation
Investment Advisor Representatives	Advisory Fee
Registered Representative	Commissions
Insurance Agent	Commissions

Conflicts of interests exist because securities and insurance sales create an incentive to recommend products based on the compensation earned rather than the best interests of the Client. Such potential conflicts of interest are subject to review by the Chief Compliance Officer.

Neither GoodLife RIA, LLC nor any of the management persons are registered or has a registration pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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

### **Code of Ethics**

GoodLife RIA, LLC has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with the firm (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. The firm and its Supervised Persons owe a duty of loyalty, fairness, and good faith towards each Client. It is the obligation of the firm's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address



employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (610) 898-6927 or by email at [info@goodliferia.com](mailto:info@goodliferia.com).

### **Personal Trading with Material Interest**

GoodLife RIA, LLC does not act as principal in any transactions. In addition, the firm does not act as the general partner of a fund or advise an investment company. GoodLife RIA, LLC does not have a material interest in any securities traded in Client accounts.

### **Personal Trading in Same Securities as Clients**

GoodLife RIA, LLC allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities, we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting.

### **Personal Trading at Same Time as Client**

Supervised Persons may not purchase or sell any security immediately prior to or immediately after a transaction being implemented for an advisory account, thereby preventing an employee from benefiting from transactions placed on behalf of advisory accounts.

---

## **Item 12 – Brokerage Practices**

---

GoodLife RIA, LLC does not maintain custody of Client assets on which we advise, although we may be deemed to have constructive custody of Client assets if you give us authority to withdraw assets from your account. Client assets must be maintained in an account at a “qualified custodian”, generally a broker/dealer or bank. GoodLife RIA, LLC generally recommends Raymond James & Associates, Inc., a member New York Stock Exchange<sup>2</sup> and a FINRA<sup>3</sup>/SIPC<sup>4</sup> member broker/dealer as the qualified custodian. Additional information about Raymond James & Associates, Inc. can be found on the Investment Adviser Public Disclosure website<sup>5</sup>. GoodLife RIA, LLC is independently owned and operated and is not affiliated with Raymond James & Associates, Inc.

---

<sup>2</sup> <https://www.nyse.com/index>

<sup>3</sup> **FINRA (Financial Regulatory Authority)** is dedicated to investor protection and market integrity through effective and efficient regulation of the securities industry. FINRA is not part of the government but an independent, not-for-profit organization authorized by Congress to protect America’s investors by making sure the securities industry operates fairly and honestly. <http://www.finra.org>.

<sup>4</sup> **SIPC (Securities Investors Protection Corporation)** was created under the Securities Investor Protection Act as a non-profit membership corporation. SIPC oversees the liquidation of member broker-dealers that close when the broker-dealer is bankrupt or in financial trouble, and customer assets are missing. <http://sipc.org>

<sup>5</sup> An official website of the United States Government 

GoodLife RIA, LLC seeks to use a broker/dealer and custodian that will hold Client assets and execute transaction on terms that are, overall, most advantageous when compared with other available providers and their services. GoodLife RIA, LLC consider a wide range of factors, including the following:

- Combination of transaction execution services and asset custody services(generally without a separate fee for custody)
- Capability to execute , clear and settle trades
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Available investment products (stocks, bonds, mutual funds, ETFs, etc.)
- Availability of investment research and tools that assist the firm in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees) and the willingness to negotiate the prices
- Reputation, financial strength, security, and stability
- Prior service to us and our clients
- Availability of other products and services that are beneficial.

Raymond James & Associates, Inc. generally does not charge Clients separately for custody services but is compensated by charging commission or other fees on trades executed or that settle at Raymond James & Associates, Inc. Raymond James & Associates, Inc. is also compensated by earning interest on the cash in a Client's account. In addition, Raymond James & Associates, Inc. charges Clients a flat amount as a "prime broker" or "trade-away" fee for each trade that is executed by a different broker/dealer but deposited into a Client's Raymond James & Associates, Inc. account.

Raymond James & Associates, Inc.is in the business of serving independent investment advisory firms like GoodLife RIA, LLC to provide institutional brokerage services (trading, custody, reporting and related services). Some of those services help GoodLife RIA manage or administer client accounts, while others help grow the business.

Raymond James & Associates, Inc.'s support services are generally available on an unsolicited basis at no additional charge. The following is a details description of Raymond James & Associates, Inc. support services.

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

- Services that may not directly benefit you: Raymond James & Associates, Inc. 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. These include investment research, both from RJ and other third-parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Raymond James & Associates, Inc.. In addition to investment research, Raymond James & Associates, Inc. also makes available software and other technology that:
  - Provide access to client account data
  - Facilitate trade execution and allocate aggregated traded orders for multiple client accounts.
  - Securities pricing and other market data
  - Facilitate payment of our fees from client accounts
  - Assist with back-office functions, record-keeping and client reporting
  
- Services that generally benefit only us. Raymond James & Associates, Inc. also offers other services intended to help us manage and further develop our business enterprise. These include:
  - Educational conference and events
  - Consulting on technology, compliance, legal and business needs
  - Publications and conferences on practice management and business secession
  - Access to employee benefit providers, human capital consultants, and insurance providers
  - Marketing consulting and support

#### Our Interest in Raymond James & Associates, Inc. Services

The availability of services from Raymond James & Associates, Inc. benefit GoodLife RIA, LLC because we do not have to produce or purchase them. These services are not contingent upon us committing any specific amount of business to Raymond James & Associates, Inc. in trading commissions or assets in custody. This creates an incentive to recommend that Clients maintain accounts at Raymond James & Associates, Inc., based on our interest in receiving Raymond James & Associates, Inc.'s services that benefit our business and Raymond James & Associates, Inc.'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. We believe, however, that our selection of Raymond James & Associates, Inc. as custodian and broker is in the best interests of our clients. Our selection of Raymond James & Associates, Inc. is primarily supported by the scope, quality and price of Raymond James & Associates, Inc. services and not by the Raymond James & Associates, Inc. services that only benefit us.

1. **Soft Dollars** - Soft dollars are revenue programs offered by broker/dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. Broker/dealers makes available various products and services designed to assist the firm in managing and administering Client accounts. These services include software and other technology that provide

access to Client account data (such as trade confirmation and account statements); facilitation of trade execution (and research reports or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making. These support services are provided based on the overall relationship without a minimum production level or value of assets held with the custodian. Consequently, it is not the result of soft dollar arrangements or any other express arrangements that involve the execution of Client transactions as a condition to receive the services.

2. **Brokerage Referrals** - GoodLife RIA, LLC does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
3. **Transaction Fees** -The Custodian charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). The Custodian enables GoodLife RIA, LLC to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. The Custodian's commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by the Custodians may be higher or lower than those charged by other custodians and broker/dealers.
4. **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, to the benefit of all Clients, we may not necessarily obtain the lowest possible commission rates for specific Client account transactions.
5. **Aggregating and Allocating Trades** - The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as price, size of order and difficulty of execution. GoodLife RIA, LLC does not aggregate purchases and sales for various Client accounts, but orders can be aggregated by the custodian.

---

### Item 13 – Review of Accounts

---

For those Clients to whom GoodLife RIA, LLC provides investment advisory services, account reviews are conducted on an ongoing basis by the Investment Advisor Representative. All Clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their Investment Advisor Representative. In addition, each Client relationship shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may also 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 GoodLife RIA, LLC 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.

Clients 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 can also establish electronic access to the Custodian's website so they can 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**

---

GoodLife RIA, LLC is a fee-based advisory firm, that is compensated by its Clients to provide investment advice and not from any investment product or someone other than the Client. GoodLife RIA, LLC does not receive commissions or other economic benefit or compensation from product sponsors, broker/dealers or any un-related third party.

##### **Client Referrals from Solicitors**

GoodLife RIA, LLC does not engage paid solicitors for Client referrals.

GoodLife RIA, LLC receives an economic benefit from Raymond James & Associates, Inc. in the form of support products and services it makes available to us and other independent invest advisors whose clients maintain their accounts at Raymond James & Associates, Inc.. In addition, Raymond James & Associates, Inc. has agreed to pay for certain products and services for which we would otherwise have to pay once the value of our clients' assets in accounts at Raymond James & Associates, Inc. reaches a certain amount.

---

#### **Item 15 – Custody**

---

GoodLife RIA, LLC does not accept or maintain direct actual custody of funds or securities. A qualified custodian is responsible to provide Clients with trade confirmations, tax forms and quarterly statements that include account balance(s). Clients are advised to carefully review the information provided by the custodian and notify their Investment Advisor Representative with any questions or if such information is not received.

GoodLife RIA has constructive custody based on the ability to directly deduct fees and by maintaining "Standing Letters of Authorization" (SLOA).

##### **Fee Deduction**

Fee deductions are based on an invoice being sent to the qualified custodian and concurrently to Clients. The invoice includes the amount of the fee, the value of Client's assets on which the fee was based, and the specific manner in which the fee was calculated as well as the name of the custodian.

The client will receive account statements from the custodian holding the account(s) at least quarterly. These statements will show all transactions within the account during that reporting period, including the amount of advisory or other fees debited from the client's account(s).

### **Standing Letters of Authorization (SLOA)**

GoodLife RIA is deemed to have constructive custody because Clients are able to establish Standing Letter of Authorization (SLOA) to make payments or transfers to authorized third parties.

- Clients provide an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- Clients authorize the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- Clients have the ability to terminate or change the instruction to the client's qualified custodian.
- GoodLife RIA has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- GoodLife RIA maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

---

### **Item 16 – Investment Discretion**

---

Clients can determine to engage GoodLife RIA, LLC to provide investment advisory services on a non-discretionary basis.

---

### **Item 17 – Voting Client Securities**

---

GoodLife RIA, LLC does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. GoodLife RIA, LLC will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

---

### **Item 18 – Financial Information**

---

Neither the firm, nor its management, have any adverse financial situations to disclose and have not been subject to a bankruptcy or financial compromise.

- The firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

---

**Item 19 – Requirements for State Registrations**

---

Information regarding the formal education, background, and additional business activities of the principal officers are included in their respective ADV 2B.

**Disciplinary Information**

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil, or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

- There are no regulatory, civil, criminal or disciplinary events to disclose.
- There are no Client lawsuits, arbitration claims, or administrative proceedings to disclose.

**Other Business**

GoodLife RIA is not actively engaged in any other business.

**Material Relationships with Issuers of Securities**

There are no relationships or arrangements with issuers of securities to disclose.

Registered As: GoodLife RIA, LLC, Inc. | CRD No. 311226

# Appendix 1

## Wrap Fee Program Brochure

2395 Lancaster Pike | Reading, PA 19607  
(610) 898-6927

**March 03, 2022**

This Form ADV2A - Appendix 1 ("Wrap Fee Brochure") provides information about the qualifications and business practices for GoodLife RIA, LLC ("the firm") services when offering services according to a wrap program. This Wrap Fee Brochure shall always be accompanied by the firm's Disclosure Brochure, which provides complete details on the business practices of the firm. If you did not receive the firm Disclosure Brochure or you have any questions about the contents of this Wrap Fee Brochure or the firm Disclosure Brochure, please contact us at (610) 898-6927 or by email at [info@goodliferia.com](mailto:info@goodliferia.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 the firm and its advisory persons are available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD No. 311226. Registration does not imply a certain level of skill or training.



---

**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.

Clients will receive, at no charge, a summary of any material changes within 120 days of the firm's fiscal year-end and promptly (generally within 30 days) after any material changes throughout the year.

---

**Item 3 – Table of Contents**

---

**Item 1 – Cover Page ..... 24**

**Item 2 – Material Changes ..... 25**

**Item 3 – Table of Contents ..... 26**

**Item 4 – Services, Fees and Compensation ..... 27**

**Item 5 – Account Requirments and Types of Clients ..... 27**

**Item 6 – Portfolio Manager Selection and Evaluation ..... 27**

**Item 7 – Client Information Provided by Portfolio Managers ..... 28**

**Item 8 – Client Contact with Portfolio Managers ..... 28**

**Item 9 – Additional Information ..... 28**

**Item 10 – Requirements for State Registered Advisers ..... 28**

---

#### **Item 4 – Services, Fees and Compensation**

---

GoodLife RIA, LLC provides investment advisory services where the asset management fee and ticket charges are "wrapped" into a single payment. This Wrap Fee Program Brochure is provided as a supplement to the firm's Disclosure Brochure (Form ADV 2A) to provide further details of the business practices and fee structure. This Wrap Fee Program Brochure references back to the firm's Form ADV 2A in which this Wrap Fee Program Brochure serves as an Appendix. Please see Item 4 – Advisory Services of the Form ADV 2A for details on the firm's investment philosophy and related services.

- GoodLife RIA, LLC is the sponsor and portfolio manager of this Wrap Fee Program and receives investment advisory fees paid by Clients and pays the Custodian for the costs associated with the regular trading activity.
- Participation in this wrap fee program may cost more or less than purchasing such services separately. For example, a Client account with a high volume of trading is likely to benefit from the fee structure of a wrap fee program whereas a Client with a low volume of trading is likely to benefit more from a fee structure that charges a transaction fee per trade with a lower asset management fee or a brokerage account that does not charge an asset management fee for active management.

#### **Other Fees and Expenses**

Mutual funds and exchange-traded funds have separate operating costs that are described in each fund's prospectus. These fees and costs will generally be used to pay management fees, account administration (e.g., custody, brokerage, and account reporting), and a possible distribution fee. GoodLife RIA, LLC does not receive any of the fees charged by a mutual fund or ETF. A Client could invest in these products directly, without the services of GoodLife RIA, LLC, but would not receive the advisory services to assist in determining which products or features are most appropriate for their financial situation and objectives. Accordingly, the Client should review the fees charged by the fund[s] and the fees charged by the firm to fully understand the total costs. Only advisory fees are retained by GoodLife RIA, LLC.

---

#### **Item 5 – Account Requirements and Types of Clients**

---

Please see Item 7 – Types of Clients in the Form ADV 2A Disclosure Brochure.

---

#### **Item 6 - Portfolio Manager Selection and Evaluation**

---

GoodLife RIA, LLC serves as sponsor and portfolio manager for the services under this Wrap Fee Program. The firm does not charge performance-based fees. The selection of the wrap fee program for a Client is based on their preference for a model-based account or open architecture as well as account minimum requirements. The performance of the wrap fee program is calculated by the custodian and reviewed based on account statements and performance reports prepared by the custodian. There is no financial incentive to recommend one wrap fee program over another.

GoodLife RIA, LLC does not accept proxy-voting responsibility. Clients will receive proxy statements directly from the Custodian. GoodLife RIA, LLC can assist in answering questions relating to proxies; however, the Client retains the sole responsibility for proxy decisions and voting.

---

**Item 7 – Client Information Provided to Portfolio Managers**

---

GoodLife RIA, LLC is the sponsor and sole portfolio manager for the Program. There is no other portfolio manager where Client information can be shared.

---

**Item 8 – Client Contact with Portfolio Managers**

---

GoodLife RIA, LLC is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at the firm.

---

**Item 9 – Additional Information**

---

The backgrounds, disciplinary information (none) and other financial industry activities and affiliations is available on the Investment Advisor Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD No. 311226. Please also see Item 9 of the firm Disclosure Brochure as well as Item 3 of each Investment Advisor Representatives Form ADV 2B Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background information.

GoodLife RIA, LLC has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The details of the Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure). Client accounts are monitored on a regular and continuous basis by the Chief Compliance Officer (“CCO”). Details of the review policies and practices are provided in Item 13 of the Form ADV Part 2A – Disclosure Brochure.

Please see Item 14 – Other Compensation in the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Brochure) for details on additional compensation that may be received by the firm or its Investment Advisor Representatives. Each Investment Advisor Representative’s Form ADV 2B Brochure Supplement (also included with this Wrap Fee Brochure) provides details on any outside business activities and the associated compensation.

- GoodLife RIA, LLC does not pay a referral fee for the introduction of Clients.
- Financial information is available in Item 18 of the Form ADV Part 2A – Disclosure Brochure.

---

**Item 10 – Requirements for State Registered Advisers**

---

GoodLife RIA, LLC does not have a relationship or arrangement with management persons of any issuer of securities.

## Privacy Policy

### Our Commitment to You

GoodLife RIA, LLC 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”). Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. GoodLife RIA, LLC (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. The firm 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. 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?

Employment Information	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 your 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?

GoodLife RIA, LLC 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 or 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> GoodLife RIA, LLC 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 GoodLife RIA, LLC 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> GoodLife RIA, LLC 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

<b>Massachusetts</b>	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
----------------------	---

## Other Important State Specific Information

**Information for California, North Dakota, and Vermont Customers.** In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

---

### **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 (610) 898-6927 or [info@goodliferia.com](mailto:info@goodliferia.com).