



ENRICH FINANCIAL PARTNERS LLC

FORM ADV – PART 2A APPENDIX 1 WRAP FEE PROGRAM BROCHURE

**EnRich Financial Partners LLC
6502 Grand Teton Plaza, Suite 201
Madison, WI 53719**

Phone (608) 275-3442 / Fax (608) 275-3445

www.enrichpartners.com

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This Wrap Fee Program Brochure provides information about the qualifications and business practices of EnRich Financial Partners LLC (“EnRich”). If you have any questions about the contents of this Brochure, please contact us at (608) 275-3442. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about EnRich, including a copy of its Form ADV Part 1, is available on the SEC’s website at www.adviserinfo.sec.gov.

EnRich is a registered investment adviser. Registration of an investment adviser does not imply any certain level of skill or training.

ITEM 2: MATERIAL CHANGES

In this section, we discuss only material changes since the last annual update of our Brochure. Each year, pursuant to SEC rules, we will ensure that you receive a summary of all material changes, if any, to this and subsequent Brochures within 120 days of the close of our fiscal year. We may also provide other ongoing disclosure information about material changes as necessary. We will provide you our brochure, at any time, without charge.

Additional Information

Our Brochure is available free of charge by contacting us at (608) 275-3442.

Additional information about us is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with us who are registered, or are required to be registered, as one of our investment adviser representatives of our firm.

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ITEM 4: SERVICES, FEES AND COMPENSATION

EnRich Financial Partners LLC (“EnRich”) is a federally registered investment adviser which offers comprehensive financial consulting and analysis, portfolio management, financial coaching and manager search and monitoring services to a wide variety of clients. EnRich has been in business since 2003 and is owned by Elaine Beckett Rich and Christopher D. Rich. EnRich is not under common control with any other firm, nor does it control any other firm.

This wrap fee program brochure discusses EnRich’s portfolio management services that are offered on a “wrap” fee basis (the “Wrap Program”). If a client elects to engage EnRich on a wrap fee basis, the client will pay a single fee for bundled services (i.e. investment advisory, brokerage, and custody). The level of service included in a wrap fee arrangement will depend upon each client’s particular need. The following is a general summary of EnRich’s services provided under the Wrap Program.

Portfolio Management Services

Portfolio Management Services includes investment advisory services and when provided through our Full Partnership Services, financial planning. The advisory services offered by EnRich allow clients to maintain an account consisting of mutual funds and other equity and debt securities such as exchange-traded funds (“ETFs”).

EnRich will obtain financial data from the client and assist the client in determining investment objectives and restrictions. EnRich’s advisors will regularly monitor the account and make investment strategy recommendations based on the specific needs and investment goals of the client. Clients must let EnRich know promptly, in writing, if their financial needs, circumstances or investment objectives change in a way that might affect our recommendations or services. In performing our services, EnRich will rely upon the information provided by the client and will not independently verify the accuracy or completeness of the information the client provides. The client shall have reasonable access to one of EnRich’s investment professionals to discuss their account.

Advisory Services Outside of the Wrap Program.

Outside Accounts and Other Assets: Clients that participate in our Wrap Program may request us to provide additional discretionary investment advice for certain outside accounts, including retirement accounts. In addition, clients may request advice for assets like fee-based annuities or a 529 college savings plan. We charge an additional fee for such services.

Independent Managers: EnRich may allocate (and/or recommend that the client allocate) a portion of a client’s investment assets among unaffiliated independent investment managers in accordance with the client’s designated investment objective(s). In such situations, the independent manager(s) shall have day- to-day responsibility for the active discretionary

management of the allocated assets. EnRich shall continue to render investment advisory services to the client relative to the ongoing monitoring and review of account performance, asset allocation and client investment objectives. Factors which EnRich shall consider in recommending independent manager(s) include the client's designated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

The investment management fees charged by the designated independent manager(s), together with the fees charged by the corresponding designated broker-dealer/custodian of the client's assets, are exclusive of, and *in addition to*, EnRich's ongoing investment advisory fee. The total advisory fee for an account utilizing independent managers shall not exceed 2.10% per annum.

eMoney Advisor Platform: EnRich may provide its clients with access to an online platform hosted by "eMoney Advisor" ("eMoney"). The eMoney platform allows a client to view a complete asset allocation, including those assets that EnRich does not manage (the "Excluded Assets"). EnRich does not provide investment management, monitoring, or implementation services for the Excluded Assets. Therefore, EnRich shall not be responsible for the investment performance of the Excluded Assets. Rather, the client (and their other advisor(s), if any, that maintain management authority for the Excluded Assets) shall be exclusively responsible for such investment performance. The eMoney platform also provides access to other types of information and functionality, including financial planning concepts and applications, which should not, in any manner whatsoever, be construed as services, advice, or recommendations provided by EnRich. EnRich is not responsible for any adverse results a client may experience if the client engages in financial planning or other functions available on the eMoney platform without EnRich's assistance or oversight.

Fees and Compensation

Wrap Program fees for the Portfolio Management Services and the Full Partnership Services and the above agreed upon services are calculated based on the following schedule. Fees cover EnRich's advisory fee, brokerage and custodial services, as described below.

| <u>Market Value of Client Assets Under Management</u> | <u>Annual Fee</u> |
|---|-------------------|
| First \$500,000 | 1.10% |
| Next \$500,000 | 0.80% |
| Next \$4,000,000 | 0.60% |
| Next \$5,000,000 | 0.40% |
| Next \$10,000,000 | 0.30% |
| Amounts over \$20,000,000 | 0.25% |

The above fees are subject to negotiation between EnRich and the applicable client. Actual fees may differ. The actual fee will be set forth in the client agreement between EnRich and the applicable client.

Fee Payment: Clients will be charged in advance at the beginning of each calendar quarter based on the previous quarter end market value. EnRich's fee will be one-fourth of the applicable annual fee rate set forth above multiplied by the fair market value of the assets in the account, determined by EnRich on the last trading day of each calendar quarter. Fees are prorated for accounts opened or terminated during the quarter. No portion of the fee will be credited to the client for the current calendar quarter should any withdrawals from the portfolio occur in the same calendar quarter.

Cash Positions: EnRich may maintain cash positions for defensive or tactical purposes. All cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating EnRich's advisory fee.

Other Fees and Charges: The fees cover all transaction costs except for: brokerage and execution costs associated with non-eligible assets held in the account or with securities and other property held outside of the account; certain transfer taxes, SEC fees, exchange fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; services provided by broker-dealers other than TD Ameritrade (which may include affiliates of TD Ameritrade) for transactions executed or effected by or through them that settle into or from the account; TD Ameritrade's (or an affiliate's) services in connection with transactions in which TD Ameritrade (or an affiliate) receives other compensation in lieu of transaction fees, including, without limitation, any fees charged by TD for its prime brokerage services or its trade away services; custody fees for non-publicly traded limited partnership or limited liability company interests, foreign securities and non-marketable securities and any other similar costs or charges. Such fees and expenses are in addition to the EnRich's Wrap Program fee and are the responsibility of the client.

In situations where EnRich is placing a large trade on behalf of an account, the client may be asked to pay the additional trading costs associated with placing such trades through the custodian's trading desk. EnRich will not place trades incurring additional costs without client's prior consent. Such costs would be in addition to the Wrap Program fee and would be the responsibility of the client.

Termination of Advisory Relationship: A client agreement may be canceled at any time, by either party, for any reason upon 30 days' advanced written notice. Upon termination of any client agreement, fees will be prorated for the number of elapsed days of the billing period before termination. Any unearned fees will be automatically refunded to client.

Wrap Program-Conflict of Interest: Participation in the Wrap Program may cost more or less than purchasing such services separately. Also, the Wrap Program fee charged by EnRich

for participation in the Wrap Program may be higher or lower than those charged by other sponsors of comparable wrap fee programs. Depending upon the percentage wrap-fee charged by EnRich, the amount of portfolio activity in the client's account, and the value of custodial and other services provided, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately and/or if EnRich were to negotiate transaction fees for the client's account. Under the Wrap Program, the client generally receives investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee. The amount of compensation received by EnRich as a result of the client's participation in the Wrap Program may be more than what EnRich would receive if the client paid separately for investment advice, brokerage and other services.

Because wrap program transaction fees and/or commissions are being paid by EnRich to the account custodian/broker-dealer, EnRich has an economic incentive to minimize the number of trades in the client's account. This represents a ***conflict of interest***. EnRich mitigates this conflict of interest by negotiating an asset-based pricing arrangement with the Program custodian. Specifically, the incentive to minimize the number of trades is mitigated because the amount charged for transactions executed for a client's account is a fixed percentage based upon the market value of assets under management

EnRich's and its supervised persons who recommend the Wrap Program to clients do not receive additional compensation as a result of a client's participation in the Wrap Program.

ITEM 5: ACCOUNT REQUIREMENTS AND TYPES OF CLIENTS

Only accounts managed by EnRich on a discretionary basis may participate in the Wrap Program, unless the account is an employer sponsored 401(k) plan (i.e., not a sole 401(k) plan). Further, to participate in the Wrap Program, EnRich generally imposes an initial minimum asset value of \$250,000 for portfolios supervised on a continuous, discretionary basis. Full Partnership Services clients agree to have at least 80% of their investable assets managed in the Wrap Program. However, the minimum can be waived by EnRich depending upon the type of account, kind of securities in the account, dollar value of securities, projected nature of trading and other services for the account, and the amount of work necessary to manage the account.

EnRich makes its Wrap Program available to a wide variety of clients including, but not limited to, individuals, trusts, estates, charitable organizations, corporations, and other business entities.

ITEM 6: PORTFOLIO MANAGER SELECTION

EnRich is the sole sponsor and sole portfolio manager for the Wrap Program, which is offered exclusively through EnRich. We do not participate in any other wrap fee programs.

EnRich also offers services, outside of the Wrap Program such as financial planning services through the Strategic Partnership Services, coaching services on a client's existing investments and investment management regarding assets in an individual employer-sponsored retirement plan. For additional information regarding these services and EnRich's fees, you may request a copy of the Part 2A of our Form ADV by contacting us at (608) 275-3442.

Our Services

EnRich shall be provided with written authority to determine which securities and the amounts of securities that are bought or sold. Any limitations on this discretionary authority shall be included in the written agreement between each client and EnRich. Clients may change/amend these limitations, in writing, at any time.

The advisory Portfolio Management Services generally include the following:

1. Establishment of investment objectives consistent with the client's risk tolerance, financial needs, and goals;
2. Establishment of asset allocation mix based on the client's financial position, cash flow, risk preferences, and time horizon;
3. Assistance with setting up of accounts at the custodial level;
4. Monitoring of investment;
5. Implementation of all trades and account management;
6. Preparation of quarterly performance reports on all accounts; and
7. Periodic review meetings to update the client's ongoing financial planning and investment progress.

In some cases, EnRich may contract with third parties to provide certain reports or use those provided by the funds and other securities.

Accounts are generally maintained by a separate custodian. Generally, TD Ameritrade shall serve as the custodian for the Wrap Program accounts.

All clients in the Portfolio Management Service receive quarterly performance reports from EnRich, which set forth the following information:

1. Performance history (net of fees)
2. Portfolio composition (percentage weighting of each asset class)
3. Portfolio inception date with initial value

4. Net additions/withdrawals
5. Quarter end portfolio value
6. Time weighted return and comparison rates of other standard indices
7. Portfolio listing of holdings

When providing Full Partnership Services, EnRich may also provide any combination of the following financial planning services to clients in the Wrap Program, as agreed on between EnRich and the client in the client agreement.

1. Investment Consulting - analysis of current investments and expected new ownership or sale of investments and recommendations of an investment allocation designed to meet the client's goals.
2. Retirement Funding and Income Analysis - analysis of retirement needs of the client. EnRich reviews existing designated retirement accounts and estimate the retirement income and expenses at various ages, establish savings, investment and investment budgets designed to meet retirement goals.
3. Education Funding Analysis - analysis of the projected amount needed to fund education of children or grandchildren.
4. Life Insurance Needs Analysis - analysis to determine recommended coverage amounts and benefits and costs of existing policies.
5. Disability Insurance Needs Analysis - analysis to review existing or proposed disability insurance coverage with the client in relation to the client's expected wage and income needs during disability.

Performance-Based Fees and Side-by-Side Management

EnRich does not charge performance-based fees (fees which are based on the share of capital gain or capital appreciation) for our management services; however, our fees will generally increase as the aggregate value of a client account increases, or decrease if the value of the account decreases, subject to our fee schedule. EnRich does not participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged a performance-based fee.

Methods of Analysis and Investment Strategies

EnRich's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon its historical and projected financial performance). EnRich

uses research material provided by third parties, including security analysts, non-affiliated investment management firms, economists, investment advisors, and rating services such as Morningstar. EnRich advisors attend conferences and teleconferences with investment managers and investment manager representatives.

EnRich's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis, EnRich must have access to current/new market information. EnRich has no control over the dissemination rate of market information; therefore, unbeknownst to EnRich, certain analyses may be compiled with outdated market information, severely limiting the value of EnRich's analysis. Furthermore, an accurate market analysis can only produce a forecast of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

EnRich's primary investment strategy - Long Term Purchases- is a fundamental investment strategy. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter- term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.

While EnRich may recommend allocating investment assets to mutual funds or ETFs that are not available directly to the public, EnRich may also recommend that clients allocate investment assets to publicly-available mutual funds or ETFs that the client could obtain without engaging EnRich as an investment advisor. Other mutual funds, such as those issued by Dimensional Fund Advisors ("DFA"), are generally only available through selected registered investment advisers. EnRich may allocate client investment assets to DFA mutual funds. Therefore, upon the termination of EnRich's services to a client, restrictions regarding transferability and/or additional purchases of, or reallocation among DFA funds will apply.

Margin / Securities Based Loans: Upon client request, EnRich may recommend that a client establish a margin loan or a securities based loan (collectively, "SBLs") with the client's broker-dealer/custodian or their affiliated banks (each, an "SBL Lender") to access cash flow. Unlike a traditional real estate-backed loan, an SBL has the potential benefit of enabling borrowers to access to funds in a shorter period of time, providing greater repayment flexibility, and may also result in the borrower receiving certain tax benefits. *Clients interested in learning more about the potential tax benefits of borrowing money on margin should consult with an accountant or tax advisor.*

The terms and conditions of each SBL are contained in a separate agreement between the client and the SBL Lender selected by the client, which terms and conditions may vary from

client to client. Borrowing funds on margin is not suitable for all clients and is subject to certain risks, including but not limited to: increased market risk, increased risk of loss, especially in the event of a significant downturn; liquidity risk; the potential obligation to post collateral or repay the SBL if the SBL Lender determines that the value of collateralized securities is no longer sufficient to support the value of the SBL; the risk that the SBL Lender may liquidate the client's securities to satisfy its demand for additional collateral or repayment / the risk that the SBL Lender may terminate the SBL at any time. Before agreeing to participate in an SBL program, clients should carefully review the applicable SBL agreement and all risk disclosures provided by the SBL Lender including the initial margin and maintenance requirements for the specific program in which the client enrolls, and the procedures for issuing "margin calls" and liquidating securities and other assets in the client's accounts.

If EnRich recommends that a client apply for an SBL instead of selling securities that EnRich manages for a fee to meet liquidity needs, the recommendation presents an ongoing ***conflict of interest*** because selling those securities (instead of leveraging those securities to access an SBL) would reduce the amount of assets to which EnRich's investment advisory fee percentage is applied, and thereby reduce the amount of investment advisory fees collected by EnRich. Likewise, the same ongoing ***conflict of interest*** is present if a client determines to apply for an SBL on their own initiative. These ongoing conflicts of interest would persist as long as EnRich has an economic disincentive to recommend that the client terminate the use of SBLs. Clients are therefore reminded that they are not under any obligation to employ the use of SBLs, and are solely responsible for determining when to use, reduce, and terminate the use of SBLs. Although EnRich seeks to disclose all conflicts of interest related to its recommended use of SBLs and related business practices, there may be other conflicts of interest that are not identified above. Clients are therefore reminded to carefully review the applicable SBL agreement and all risk disclosures provided by the SBL Lender as applicable, and contact EnRich's Chief Compliance Officer with any questions regarding the use of SBLs.

Risk of Loss

As a condition to participating in the Wrap Program, the client participant must accept that past performance may not be indicative of future results, and understand that the future performance of any specific investment or investment strategy (including the investments and/or investment strategies purchased and/or undertaken by EnRich) may not achieve their intended objective, be profitable, or equal historical performance level(s) or any other performance level(s).

Each type of investment has its own unique set of risks associated with it. The following provides a short description of some of the underlying risks associated with the types of investments that EnRich employs:

Market Risk. The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk may be caused by external factors (such as economic or political factors), but may also be incurred because of a security's specific underlying investments. Additionally, each security's price can fluctuate based on market movement, which may or may not be due to the security's operations or changes in its true value. For example, political, economic, and social conditions may trigger market events which are temporarily negative, or temporarily positive.

Unsystematic Risk. Unsystematic risk is the company-specific or industry-specific risk in a portfolio that the investor bears. Unsystematic risk is typically addressed through diversification. However, as indicated above, diversification does not guarantee better performance and cannot eliminate the risk of investment losses.

Value Investment Risk. Value stocks may perform differently from the market as a whole and following a value-oriented investment strategy may cause a portfolio to underperform growth stocks.

Growth Investment Risk. Prices of growth stocks tend to be higher in relation to their companies' earnings and may be more sensitive to market, political and economic developments than other stocks, making their prices more volatile.

Small Company Risk. Securities of small companies are often less liquid than those of large companies and this could make it difficult to sell a small company security at a desired time or price. As a result, small company stocks may fluctuate relatively more in price. In general, small capitalization companies are more vulnerable than larger companies to adverse business or economic developments and they may have more limited resources.

Commodity Risk. The value of commodity-linked derivative instruments may be affected by changes in overall market movements, commodity index volatility, changes in interest rates, or factors affecting a particular industry or commodity, such as drought, floods, weather, livestock disease, embargoes, tariffs, and international economic, political, and regulatory developments.

Foreign Securities and Currencies Risk. Foreign securities prices may decline or fluctuate because of: (i) economic or political actions of foreign governments, and/or (ii) less regulated or liquid securities markets. Investors holding these securities are also exposed to foreign currency risk (the possibility that foreign currency will fluctuate in value against the U.S. dollar).

Interest Rate Risk. Fixed income securities and fixed income-based securities are subject to interest rate risk because the prices of fixed income securities tend to move in the opposite direction of interest rates. When interest rates rise, fixed income security prices tend to fall.

When interest rates fall, fixed income security prices tend to rise. In general, fixed income securities with longer maturities are more sensitive to these price changes.

Inflation Risk. When any type of inflation is present, a dollar at present value will not carry the same purchasing power as a dollar in the future, because that purchasing power erodes at the rate of inflation.

Reinvestment Risk. Future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate), which primarily relates to fixed income securities.

Credit Risk. The issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and impact performance. Credit risk is considered greater for fixed income securities with ratings below investment grade. Fixed income securities that are below investment grade involve higher credit risk and are considered speculative.

Call Risk. During periods of falling interest rates, a bond issuer will call or repay a higher-yielding bond before its maturity date, forcing the investment to reinvest in bonds with lower interest rates than the original obligations.

Regulatory Risk. Changes in laws and regulations from any government can change the market value of companies subject to such regulations. Certain industries are more susceptible to government regulation. For example, changes in zoning, tax structure or laws may impact the return on investments.

Mutual Fund Risk. Mutual funds are operated by investment companies that raise money from shareholders and invest it in stocks, bonds, and/or other types of securities. Each fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. Mutual funds charge a separate management fee for their services, so the returns on mutual funds are reduced by the costs to manage the funds. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market. Mutual funds come in many varieties. Some invest aggressively for capital appreciation, while others are conservative and are designed to generate income for shareholders. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Exchange Traded Fund Risk. ETFs are marketable securities that are designed to track, before fees and expenses, the performance or returns of a relevant index, commodity, bonds, or basket of assets, like an index fund. Unlike mutual funds, ETFs trade like common stock on a stock exchange. ETFs experience price changes throughout the day as they are bought and sold.

In addition to the general risks of investing, there are specific risks to consider with respect to an investment in ETFs, including, but not limited to: (1) an ETF's shares may trade at a market price that is above or below its net asset value; (2) the ETF may employ an investment strategy that utilizes high leverage ratios; or (3) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally.

EnRich does not guarantee the results of the advice given. Thus, significant losses can occur by investing in any security, or by following any strategy, including those recommended or applied by EnRich.

Voting Client Securities

EnRich will not vote proxies on behalf of any client or respond to any legal notices or class action claims on behalf of any client. We will instruct the qualified, independent custodian to forward all proxy materials, legal notices and class action information to the client to review. The client should make his or her own informed decision on how to vote or respond to a legal notice. In the event we receive such material, we will forward them directly to the client by mail or by electronic mail (if the client has authorized electronic communication).

ITEM 7: CLIENT INFORMATION PROVIDED TO PORTFOLIO MANAGERS

EnRich is the sole portfolio manager of the Wrap Program and does not share any personal information it collects from its clients other than as required by law, regulatory mandate or as otherwise disclosed in its privacy policies provided to its clients. EnRich collects the following information regarding the client in order to formulate its investment recommendations to the client: income; employment and residential information; social security number; bank account numbers; cash balance and security balances; liabilities and securitizations; transaction detail history; and investment objectives, goals and risk tolerance. EnRich considers the following factors, among others, when recommending and implementing investment recommendations: sources of wealth and/or deposits; risk assessment; investment time horizon; income and liquidity needs; asset allocation; and restrictions on management of accounts.

Sources of information used to develop EnRich's recommendations may include, but are not limited to, the following: client questionnaire(s) and interview(s); client tax return(s); review of client's current portfolio; analysis of historical risk/return characteristics of various asset classes; analysis of the long-term outlook for global financial market; analysis of the long-term global economic and political environments.

ITEM 8: CLIENT CONTACT WITH PORTFOLIO MANAGERS

EnRich encourages and invites communications with its clients and does not limit or condition the amount of time clients can spend with EnRich's advisory professionals.

ITEM 9: ADDITIONAL INFORMATION

Disciplinary Information

EnRich is required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of us, our business or the integrity of our management or associated persons. Neither EnRich nor any of its associated persons has any reportable disciplinary events to disclose.

Other Financial Industry Activities and Affiliations

Licensed Insurance Agents. Certain of EnRich's advisors are, in their individual capacities, licensed insurance agents, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage certain of EnRich's representatives to purchase insurance products on a commission basis.

The recommendation by EnRich's advisors that a client purchase insurance commission products presents a *conflict of interest*, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a particular client's need. No client is under any obligation to purchase any insurance products from EnRich's representatives. Clients are reminded that they may purchase insurance products recommended by EnRich through other, non-affiliated insurance agents.

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

Code of Ethics. EnRich has adopted a Code of Ethics that sets forth high ethical standards of business and professional conduct which we require our employees to follow. The Code of Ethics outlines proper conduct related to all services provided to clients by EnRich and its associated persons and includes guidelines for compliance with applicable laws and regulations governing our practice. Our goal is to protect our clients' interests at all times and demonstrate our commitment to our fiduciary duties of honesty, good faith and fair dealing.

Personal Securities Transactions and Interests. Through its professional activities, EnRich and its supervised persons are exposed to potential conflicts of interest and the Code of Ethics contains provisions designed to mitigate certain of these potential conflicts by governing the personal securities transactions of certain of its employees, officers, and directors. In particular, the Code of Ethics governs the conduct of certain "access persons" in circumstances where EnRich or access persons may desire to purchase or sell securities for their personal accounts that are identical to those recommended by EnRich to its clients. For these purposes,

the Code of Ethics defines an “access” person as a supervised person of EnRich that (1) has access to nonpublic information regarding any clients’ purchase or sale of securities, (2) has access to nonpublic information regarding the portfolio holdings of any fund the adviser or its control affiliates manage or sponsor, or (3) is involved in making securities recommendations (or has access to such recommendations) to clients that are nonpublic.

Access persons’ trades must be executed in a manner consistent with the following principles: the interests of client accounts will at all times be placed first; all personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual’s position of trust and responsibility; access persons must not take inappropriate advantage of their positions; and preclearance of access persons’ transactions in securities in a limited offering or private placement is required.

Access persons must submit quarterly reports regarding securities transactions and newly opened accounts, as well as annual reports regarding holdings and existing accounts. EnRich monitors access persons’ personal trading activity at least quarterly to ensure compliance with internal control policies and procedures and our Code of Ethics.

Neither EnRich nor its access persons have any material financial interest in client transactions beyond the provision of investment advisory services or other services as disclosed in this Brochure. EnRich does not engage in principal trading (i.e., the practice of selling stock to advisory clients from our inventory or buying stocks from advisory clients into our inventory). Nor does EnRich engage in agency cross transactions.

Clients or prospective clients may obtain a copy of our Code of Ethics upon request by contacting us at (608) 275-3442.

Review of Accounts and Reports

EnRich advisors review quarterly portfolio reports provided to clients on a quarterly basis, or more frequently if requested by a client. Each is a Certified Financial Planner Practitioner (CFP®). EnRich provide each client with a review of the client’s financial situation as frequently as deemed necessary. This review includes goals and assumptions, financial statements, cash flow and taxes, investments, retirement projections, insurance, estate, and general financial planning.

Accounts are reviewed quarterly or more frequently as contributions and economic situations change. All clients receiving Portfolio Management Services receive quarterly portfolio performance reports from EnRich which provide clients with: (1) performance history, net of fees; (2) portfolio composition, percentage weighting of each asset class; (3) portfolio inception date with initial value; (4) net additions/withdrawals; (5) quarter end portfolio value; (6) time weighted return and comparison rates of return of other standard indices; and (7) listing of portfolio holdings.

A statement showing the market value of the securities in a client's account is sent monthly or quarterly by the investment company that holds the client's investments.

Summaries are prepared at the request for financial planning.

Client Referrals and Other Compensation

EnRich does not currently have any client referral relationships. Thus, it does not pay any fee to a third party for making client referrals to it.

EnRich may sponsor social events for clients, the expenses of which may be paid, in whole or part, by firms whose products and services are recommended to clients by EnRich. The firms absorbing such expenses may include mutual fund companies whose shares are recommended, attorneys whose services are recommended, brokerage firms through which client account transactions are processed, and other firms. These expense reimbursements create a ***conflict of interest*** for EnRich because it is inclined to continue to recommend the products and services of these providers due to the financial support provided to EnRich by them.

TD Ameritrade Relationship

EnRich generally require its clients to use the custodial and brokerage transaction services of TD Ameritrade for participation in the Wrap Program.

EnRich participates in the institutional advisor program (the "TD Ameritrade Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., an unaffiliated SEC- registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. EnRich receives some benefits from TD Ameritrade through its participation in the TD Ameritrade Program.

Clients should be aware that there is no direct link between EnRich's participation in the TD Ameritrade Program and the investment advice it gives to its clients, although EnRich receives economic benefits through its participation in the TD Ameritrade Program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk servicing advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to EnRich by third party vendors. TD Ameritrade may also have paid for business

consulting and professional services received by EnRich's related persons and may also pay or reimburse expenses (including travel, lodging, meals, and entertainment expenses) for EnRich's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the TD Ameritrade Program may benefit EnRich but may not benefit its client accounts. These products or services may assist EnRich in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help EnRich manage and further develop its business enterprise. The benefits received by EnRich through participation in the TD Ameritrade Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by EnRich or its related persons in and of itself presents conflict of interest and may indirectly influence EnRich's recommendation of TD Ameritrade for custody and brokerage services.

These services are provided to EnRich at minimal or no cost. EnRich believes that use of TD Ameritrade is a convenient means of obtaining efficient transaction executions, account data and reporting services for securities positions. However, receipt of such services at minimal or no cost also creates an inducement and ***conflict of interest*** for EnRich since referring clients to any other firm(s) may result in higher reporting and overhead costs to EnRich.

Financial Information.

EnRich does not receive fees of more than \$1,200 six months or more in advance, thus no financial statement for EnRich is attached. EnRich does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.

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