

ValueWealth Services, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of ValueWealth Services, LLC. If you have any questions about the contents of this brochure, please contact us at (410)-286-9230 or by email at: sbunnell@valuewealthservices.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 ValueWealth Services, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. ValueWealth Services, LLC's CRD number is: 304049

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

Version Date 02/28/2023

Item 2: Material Changes

ValueWealth Services, LLC was founded in 2004. It is an SEC registered investment advisory firm. Since its last filing of March 2022, two material change has occurred.

Item 4: AUM as of December 2022 is \$161,145,674.00

Item 10: Addition of Charles Schwab Institutional as a custodial relationship

If you would like another copy of this brochure, please download it form the SEC website as indicated on page one or you may contact Ms. Stephanie Bunnell at phone number (410)-286-9230 or email at sbunnell@valuewealthservices.com. We encourage you to read this document in its entirety.

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Item 4: Advisory Business

A. Description of the Advisory Firm

ValueWealth Services, LLC is a Limited Liability Company organized in the state of Maryland.

This firm was formed in the year 2004, and the principal owner is Peter Wyrrough.

B. Types of Advisory Services

ValueWealth Services, LLC (hereinafter “VALUEWEALTH SERVICES, LLC”) offers the following services to advisory clients:

Investment Supervisory Services

VALUEWEALTH SERVICES, LLC offers ongoing portfolio management services and institutional consulting services based on the individual goals, return/income, objectives, time horizon, tax status, liquidity needs and risk tolerance of each client. VALUEWEALTH SERVICES, LLC creates an Investment Plan for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a strategy to aid in the selection of a portfolio that matches the client’s situation. Investment Supervisory Services include, but are not limited to, the following:

- | | |
|-----------------------|------------------------------------|
| • Investment strategy | • Personal investment plan |
| • Asset allocation | • Client or portfolio consultation |
| • Risk tolerance | • Regular portfolio monitoring |
| • Sector Selection | • Financial Planning |

VALUEWEALTH SERVICES, LLC will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are determined via communication with their clients.

Selection of Investment Managers and Strategies

We can direct clients to ValueWealth Services, LLC for implementation of selected investment management portfolios and strategies.

Services Limited to Specific Types of Investments

VALUEWEALTH SERVICES, LLC generally limits its money management to mutual funds, individual equities, options, equity-linked CDs, structured notes, and ETF/Ns. VALUEWEALTH SERVICES, LLC may use other securities as well to help diversify a portfolio when applicable.

Sub-Advisor Services/Third Party Investment Advisory Services

VALUEWEALTH SERVICES, LLC may also use and/or act as a sub-advisor to advisors unaffiliated with VALUEWEALTH SERVICES, LLC. These third-party advisors would outsource portfolio management and/or portfolio strategist services to VALUEWEALTH SERVICES, LLC. This relationship will be memorialized in each contract between VALUEWEALTH SERVICES, LLC and the third-party advisor. FeeX is a Third Party Investment money manger that can be utilized by VALUEWEALTH SERVICES, LLC and its IAR's

Financial Planning and Consultation Services

VALUEWEALTH SERVICES, LLC'S investment management services may include the analysis of a client's situation and assistance in identifying and implementing appropriate financial planning and investment management techniques to help meet specific financial objectives. VALUEWEALTH SERVICES, LLC'S financial planning and consulting services may include many services including but not limited to: existing portfolio evaluation, income planning strategies, debt analysis, and cash flow. In performing these services, VALUEWEALTH SERVICES, LLC is not required to verify any information received from client or from the client's other professionals (e.g. attorneys, accountants, etc.) and is expressly authorized to rely on such information. VALUEWEALTH SERVICES, LLC may recommend clients, engage the Firm for additional related services. Clients are advised that a conflict of interest exists if clients engage VALUEWEALTH SERVICES, LLC to provide additional services for compensation. Clients retain absolute discretion over all decisions regarding implementation and are under no obligation to act upon any of the recommendations made by VALUEWEALTH SERVICES, LLC under a financial planning or consulting engagement.

C. Client Tailored Services and Client Imposed Restrictions

VALUEWEALTH SERVICES, LLC offers a similar suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon ValueWealth Services, LLC and client's investment outlook which takes into account each client's situation as described in the Investment Supervisory Services under Item 4.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent

VALUEWEALTH SERVICES, LLC from properly servicing the client account, or if the restrictions would require VALUEWEALTH SERVICES, LLC to deviate from its standard suite of services, VALUEWEALTH SERVICES, LLC reserves the right to review and/or end the relationship.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative/platform fees. VALUEWEALTH SERVICES, LLC does not participate wrap fee programs.

E. Amounts Under Management

VALUEWEALTH SERVICES, LLC has the following approximate assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 161,145,674.00	0	December 2022

Item 5: Fees and Compensation

A. Fee Schedule and Billing

Investment Supervisory Services Fees

These fees are negotiable (maximum annual fee 1.95%), depending upon the needs of the client and complexity of the proposed investment strategy and overall situation, and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract.

Fees are paid either monthly or quarterly in advance. Fees will be charged at the beginning of each month or the beginning of each quarter. The account value used in the fee calculation will include all positions, cash, dividends (declared and paid), accrued income and interest payments (unless specifically excluded in the agreement to the Advisor). Clients may terminate their contracts with ten days written notice to ValueWealth Services, LLC. Upon termination ValueWealth Services, LLC will pro-rate the fee to the day of the month or quarter where services were provided and any residual will be returned to client. Clients may terminate their accounts without penalty within five business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization. Each quarter a fee is directly deducted from a client's account and will be listed and detailed on the client's custodian statement. Lower fees for comparable services may be available from other sources.

The investment management agreement will continue in effect until terminated by either party by giving to the other ten business days written notice. Client may terminate the Agreement within five (5) business days of signing, without penalty, and with full refund.

Sub-Advisor Fees/Third Party Investment Advisory Fees

VALUEWEALTH SERVICES, LLC may also act as a sub-advisor (third party advisor to assist in management of a client portfolio) to other investment advisors to purchase or sell security positions based on analysis at their sole discretion) to unaffiliated third-party advisors and VALUEWEALTH SERVICES, LLC would receive a fixed asset-based fee according to assets under advisement payable by the third-party advisor. The fees charged are negotiable and will not exceed any limit imposed by any regulatory agency. This relationship will be memorialized in each contract between VALUEWEALTH SERVICES, LLC and the third-party advisor.

The unaffiliated third-party advisor may terminate the sub-advisor agreement with or without cause at any time upon written notice to the VALUEWEALTH SERVICES, LLC at least 24-hours in advance of the next trading session. VALUEWEALTH SERVICES, LLC may terminate the agreement with or without cause at any time upon one week's prior written notice to the unaffiliated third-party advisor. The unaffiliated third-party advisor will pay the prorated portion of the fees as of the termination date. The termination of the unaffiliated third-party by its client will automatically terminate VALUEWEALTH SERVICES, LLC's role as the sub-advisor.

Financial Planning, Client and Portfolio Consultation Fees

For Financial Planning, Client and Portfolio consultation, VALUEWEALTH SERVICES, LLC may charge on either an hourly rate or a flat fee basis, depending on client needs. The hourly service is more appropriate if an individual needs guidance or advice on a specific issue. Examples include review of investment portfolios, access options for debt management, or to research available options for college savings plans.

A maintains an ownership interest through a separate LLC (IN) which provides research and related services to

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly or quarterly in advance. Fees will be reflected in client's monthly custodial statements.

Payment of Sub-Advisor Fees

Sub-advisor fees (fees charge by a third party advisor to assist in management of a client portfolio), are payable by third-party advisors applying fixed basis points to assigned assets, and not by their clients directly. Third-party advisors may be invoiced for such fees, as provided by contract between VALUEWEALTH SERVICES, LLC and the

applicable third-party advisor. Sub-Advisory service fees range from a fixed 20-30 basis points annually of assets under advisement, ranging depending on the number of clients/assets and complexity of selected trading programs, payable to VALUEWEALTH SERVICES, LLC directly by the third-party advisor. It is not the practice of VALUEWEALTH SERVICES, LLC to directly contract with and/or bill third-party advisors.

Financial Planning, Client and Portfolio Consultation Fees

VALUEWEALTH SERVICES, LLC generally charges a fixed and/or hourly fee for providing financial planning and client and portfolio consultation services under a stand-alone engagement. These fees are negotiable, but will be up to \$5000.00 on a fixed fee basis and/or from \$150.00 to \$500.00 on an hourly basis, depending upon the scope and complexity of the services and the professional rendering the financial planning and/or the consulting services. If the client engages VALUEWEALTH SERVICES, LLC for additional investment advisory services, VALUEWEALTH SERVICES, LLC may offset all or a portion of its fees for those services based upon the amount paid for the financial planning and/or consulting services. Client and Portfolio consultation, VALUEWEALTH SERVICES, LLC may charge on either an hourly rate or a flat fee basis, depending on client needs. The hourly service is more appropriate if an individual needs guidance or advice on a specific issue. Examples include review of investment portfolios, access options for debt management, or to research available options for college savings plans.

The terms and conditions of the financial planning and/or consulting engagement are set forth in the Advisory Agreement or Financial Planning agreement. VALUEWEALTH SERVICES, LLC generally requires one-half of the fee (estimated hourly or fixed) payable upon execution of the agreement. The outstanding balance is generally due upon delivery of the financial plan or completion of the agreed upon services. If the client cancels the financial planning or other agreed upon services within the first week of signing the agreement, VALUEWEALTH SERVICES, LLC will refund 50% of the fee. VALUEWEALTH SERVICES, LLC does not take receipt of \$1,250.00 or more in prepaid fees in excess of six months in advance of services rendered

C. Clients Are Responsible for Third-Party Fees

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

D. Prepayment of Fees

Fees are paid either monthly or quarterly in advance, and clients may terminate their contracts with ten days' written notice. If Investment Advisory contract is terminated,

Valuwealth Services, LLC will pro-rate the fee for the portion of the month or quarter where services were provided and return residual to client.

E. Outside Compensation for the Sale of Securities to Clients

VALUEWEALTH SERVICES, LLC does receive compensation for the sale and management of securities or other investment products including based sales charges or service fees from the sales of annuities.

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

VALUEWEALTH SERVICES, LLC does not receive Performance-based fees nor conducts side-by-side management.

Item 7: Types of Clients

VALUEWEALTH SERVICES, LLC generally provides management supervisory and institutional consulting services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Institutional Clients

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

VALUEWEALTH SERVICES, LLC's methods of analysis include fundamental analysis, technical analysis and cyclical analysis. Each of these methods may be assessed using quantitative measures, and the weightings of the methods themselves may vary over time.

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

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

c) Cyclical analysis involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

VALUEWEALTH SERVICES, LLC can use short-term trading, short sales, margin transactions, and options writing (including covered options, uncovered options, or spreading strategies).

ValueWealth Services, LLC uses a multi-factor model to assist them in portfolio management. These include measuring the market valuation (stock earnings versus Treasury Bond yields), the direction/level of interest rates, market price trends, and investor psychology (optimism versus pessimism)

Investing in securities involves a significant risk of loss that you, as a client, should be prepared to bear. The adviser's approaches may not be suitable for all investors. All investing is risky and past performance, whether actual or tested, is no guarantee of future results or profitability.

B. Material Risks Involved

Methods of Analysis

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

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

c) Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

Short term trading, short sales, margin transactions, and options writing generally hold greater risk and clients should be aware that there is a material risk of loss using any of those strategies.

Investing in securities involves a significant risk of loss that you, as a client, should be prepared to bear. The adviser's approaches may not be suitable for all investors. All investing is risky and past performance, whether actual or tested, is no guarantee of future results or profitability.

C. Risks of Specific Securities Utilized

VALUEWEALTH SERVICES, LLC attempts to seek investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets. However, it may utilize short sales, margin transactions, and options writing. Short sales, margin transactions, and options writing generally hold greater risk of capital loss and clients should be aware that there is a material risk of loss using any of those strategies. Reasonable restrictions on security selection and trading will be accepted for all VALUEWEALTH SERVICES, LLC model approaches to investing.

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

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

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

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

Short sales risks include the upward trend of the market and the infinite possibility of loss.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral.

Options writing involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market.

Investing in securities involves a significant risk of loss that you, as a client, should be prepared to bear. The adviser's approaches may not be suitable for all investors. All investing is risky and past performance, whether actual or tested, is no guarantee of future results or profitability.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization (SRO) proceedings to report

Item 10: Other Financial Industry Activities and Affiliations

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

VALUEWEALTH SERVICES, LLC representatives are registered as or have pending applications to become a broker/dealer or as representatives of a broker/dealer.

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

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

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

VALUEWEALTH SERVICES, LLC is required to disclose certain financial industry activities and affiliations. Through its Code of Ethics, VALUEWEALTH SERVICES, LLC requires all Investment Advisors to adhere to all Federal Securities Laws, firm policies and be properly licensed or registered with the appropriate agency prior to engagement with clients.

Conflicts of interest though unintentional, may arise. To manage potential conflicts of interests VALUEWEALTH SERVICES, LLC will ensure all pertinent material conflicts of interests are fully disclosed; Use its Policy and Procedures to mitigate these conflicts of interest; Inform clients through disclosure of potential conflicts of interest and its impact; or by avoiding the service or activity that gives rise to the conflict of interest.

D. Selection of Other Advisors or Managers/Strategists and How This Advisor is Compensated for Those Selections

VALUEWEALTH SERVICES, LLC may utilize strategies available on Charles Schwab's and TD Ameritrade's asset management platform, which serves as sub-advisor for the purpose of executing third-party strategist trades. In the event the Charles Schwab or TD Ameritrade platform is selected, the client will receive additional disclosure and agreement documents from the platform prior to account activation. VALUEWEALTH SERVICES, LLC does not receive compensation from Charles Schwab or TD Ameritrade

or any fund strategist thereon. VALUEWEALTH SERVICES, LLC may also utilize the services of FeeX on behalf of clients. FeeX is an asset management platform that serves the purpose of executing third-party trades. If utilized, the client may receive additional disclosure and agreement documents from such parties prior to account activation.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

VALUEWEALTH SERVICES, LLC may recommend that clients buy or sell securities in which a related person to VALUEWEALTH SERVICES, LLC or VALUEWEALTH SERVICES, LLC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of VALUEWEALTH SERVICES, LLC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of VALUEWEALTH SERVICES, LLC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. VALUEWEALTH SERVICES, LLC will always document any transactions that could be construed as conflicts of interest and will always transact client business before or simultaneous to their own when similar securities are being bought or sold.

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

From time to time, representatives of VALUEWEALTH SERVICES, LLC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of VALUEWEALTH SERVICES, LLC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. VALUEWEALTH SERVICES, LLC will always transact client's

transactions either before or simultaneous to its own when similar securities are being bought or sold.

Item 12: Brokerage Practices

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

VALUEWEALTH SERVICES, LLC generally recommends that clients utilize the custody, brokerage and clearing services of TD AMERITRADE Institutional, a division of TD AMERITRADE, Inc. ("TD Ameritrade"), and Charles Schwab Institutional. Both TD Ameritrade and Charles Schwab offer services to independently registered investment advisors which include custody of securities, trade execution, and clearance and settlement of transactions. The firm receives some benefit from Charles Schwab and TD Ameritrade through its participation in the Charles Schwab and TD Ameritrade Institutional program. The firm may recommend Charles Schwab and TD Ameritrade to clients for custody and brokerage services. The Custodian is chosen based on their relatively low transaction fees, client-matched services and access to mutual funds, options, ETFs/ETNs. VALUEWEALTH SERVICES, LLC will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

1. Research and Other Soft-Dollar Benefits

VALUEWEALTH SERVICES, LLC receives no research, product, or services other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft-dollar benefits").

2. Brokerage for Client Referrals

VALUEWEALTH SERVICES, LLC receives no referrals from a broker-dealer or third-party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Custodian to Use

VALUEWEALTH SERVICES, LLC may allow clients to direct VALUEWEALTH SERVICES, LLC to use a specific custodians to execute transactions on a case-by-case basis. Generally speaking; however, clients are requested to select an VALUEWEALTH SERVICES, LLC recommended custodian.

B. Aggregating (Block) Trading for Multiple Client Accounts

VALUEWEALTH SERVICES, LLC maintains the ability to block trade purchases across accounts. Block trading may benefit a large group of clients by providing VALUEWEALTH SERVICES, LLC the ability to purchase larger blocks resulting in smaller transaction costs to the client. Declining to block trade can cause more expensive trades for clients.

Item 13: Reviews of Accounts

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

Client accounts are reviewed no less than annually by ValueWealth Services, LLC staff. Accounts are reviewed with regards to their investment strategies and risk/reward tolerance levels.

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

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

C. Content and Frequency of Regular Reports Provided to Clients

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

Item 14: Client Referrals and Other Compensation

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

When acting as a sub-advisor, VALUEWEALTH SERVICES, LLC receives a fixed portion of the unaffiliated third-party advisor's client management fee. This may create a financial incentive because ValueWealth Services, LLC may use some unaffiliated third-party advisors may pay a larger portion of their fee to VALUEWEALTH SERVICES, LLC. However, VALUEWEALTH SERVICES, LLC mitigates any conflicts of interest by always acting in the clients' best interest through its fiduciary duty. Additional information about these fees can be found in Item 5 above.

B. Compensation to Non – Advisory Personnel for Client Referrals

VALUEWEALTH SERVICES, LLC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

VALUEWEALTH SERVICES, LLC, with client written authority, has limited custody of client's assets through direct fee deduction of VALUEWEALTH SERVICES, LLC's Fees only. If the client chooses to have fees withdrawn directly by the Custodian, VALUEWEALTH SERVICES, LLC would have constructive custody over that account and must have written authorization from the client to do so. VALUEWEALTH SERVICES, LLC reviews money handling activity of the client accounts and of the advisor to ensure that custody of client funds is not exercised beyond what is provided for in the Investment Management Agreement irrespective of the terms of the Advisor's Custodial Agreement. In addition the financial institutions that act as the qualified custodian for client accounts from which the firm retains the authority to directly deduct fees, have agreed to send statements not less than quarterly detailing all account transactions including any amount paid to VALUEWEALTH SERVICES, LLC. Clients will receive all required account statements and billing invoices that are required in each jurisdiction.

Item 16: Investment Discretion

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

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

VALUEWEALTH SERVICES, LLC does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

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

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

C. Bankruptcy Petitions in Previous Ten Years

VALUEWEALTH SERVICES, LLC has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements for State Registered Advisors

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

VALUEWEALTH SERVICES, LLC has one management person/executive officer; Peter Wyrrough. Mr. Wyrrough's education and business background can be found on the Supplemental ADV Part 2B form. Chief Compliance Officer is Ms. Stephanie Bunnell.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Mr. Wyrrough has no reportable outside business activities. Mr. Wyrrough does business through ValueWealth Services to market the services offered.

C. How Performance Based Fees are Calculated and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at ValueWealth Services, LLC has been involved in an arbitration claim or found liable civil, self-regulating organization or administrative proceeding that is material to the client's evaluation of the firm or its management.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither VALUEWEALTH SERVICES, LLC, nor its management persons, has any relationship or arrangement with issuers of securities.