



Firm Brochure- Form ADV Part 2A

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

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

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

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Item 2: Material Changes

There are the following material changes in this brochure from the last annual updating amendment of Signify Wealth LLC on March 16, 2023. Material changes relate to Signify Wealth LLC's policies, practices or conflicts of interests.

Additional Advisory services listed: Investment Management, Managed Accounts, Client Directed Investments, and Financial Planning/Consulting Services (Item 4B)

Added/Updated fee schedule, Negotiability of Fees & Other Terms, Client Direct Investment Services, Managed Account Programs, Payment of Fees, and Clients Are Responsible for Third Party Fees (Item 5A-C)

Minimum Account Size Increased (Item 7)

Added relationship with Third-Party Manager (Item 10D)

The firm now uses a solicitor for client referrals. (Item 14.B)

Updated Proxy Voting (Item 17)

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Item 4: Advisory Business

A. Description of the Advisory Firm

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

- This firm has been in business since December 2011.
- Signify Wealth LLC is owned by Signify Holding Corporation which is 100% owned by Stephen P. Rhodes

B. Types of Advisory Services

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

Investment Management Services

SW provides discretionary investment management services for its Clients either directly or through allocation to unaffiliated Third-Party Managers participating in a Managed Account Program. For Clients with accounts managed through a Managed Account Program, the Third-Party managers will also require such authority.

Based on information you provide about your individual and family circumstances, financial situation, securities portfolio, investment objectives (such as income, balanced growth and income, or maximum growth, for example), expected investment time horizon, tolerance for volatility or risk in your portfolio, and liquidity needs, we will work with you to develop an appropriate investment program.

SW primarily allocates Client assets among various Third-Party managers; we may also manage all or a portion a Client’s account(s) internally. In addition to Third-party managers, SW may construct Client portfolios utilizing mutual funds, exchange-traded funds (“ETFs”), individual equity securities and fixed income securities. SW may employ other types of investments as necessary to achieve the Client’s objectives. SW may also recommend that certain accredited investors (as defined by Rule 501 of the Securities Act of 1933) invest in privately placed securities, which may include debt, equity 6 or interests in pooled investment vehicles (e.g. hedge funds). Where applicable, SW may also provide advice regarding legacy positions or other investments held in a Client’s portfolio. Please refer to Item 8 – Methods Of Analysis, Strategies & Risk Of Loss for information about the investment strategies and types of investments we generally recommend to Clients.

Managed Accounts Program

Client’s investible assets can be managed by us through a Managed Account Program sponsored by one of the institutional management firms we recommend (each referred to as a “Sponsor”).

We believe many Clients can benefit from the diverse investment products, strategies, portfolios, and institutional managers available through Managed Account Programs. We will assist the Client to select an appropriate Managed Account Program and to designate an initial investment strategy and model portfolio, and if appropriate, a third-party manager to manage their account. Currently, we have Clients participating in the Managed Account Programs sponsored by Dynasty Wealth Management, LLC (“DWM”), a subsidiary of

Dynasty Financial Partners, LLC (“DFP”) (collectively “Dynasty”), Envestnet and other investment platforms. The vast majority of our Clients are using Managed Account Programs through Dynasty. Please see Item 10 – Other Financial Industry Activities & Affiliations for additional disclosures.

Dynasty provides an integrated platform service provider of business resources to Registered Investment Advisors (“RIA”). Dynasty provides access to trading technology, reporting and investments through an open architecture system. Dynasty selects, builds and monitors investment portfolios in order to cater to various levels of investor sophistication. SW uses Dynasty’s Separately Managed Accounts (“SMA”) and Unified Managed Accounts (“UMA”) to create custom portfolios for a range of Client needs. Dynasty’s SMA/UMA solutions include:

- Institutional quality research
- Integrated flexible performance reporting options
- A single technology platform to manage trading, research and reporting

Accounts participating in a Managed Account Program will typically pay a quarterly Program Fee (calculated as a percentage of assets) that include (i) the Program Sponsor’s services in researching and adjusting the model portfolios and strategies, screening available investment options, and performing initial due diligence and on-going monitoring of Third-Party Managers, (ii) the day-to-day investment management services of Third-Party Managers, if any, selected for the account, and (iii) the broker-dealer’s brokerage and custody services.

For Clients that we recommend a Managed Account Program, we will explain the objectives of the Program, the characteristics and risk profiles of the available investment portfolios, the management styles and strategies of the Third-Party Managers, and the potential benefits, costs, risks, and requirements of the program.

Clients who choose to participate in a Managed Account Program, we will assist the Client to identify a suitable model portfolio or strategy, and if applicable to the Managed Account Program, an appropriate Third-Party Manager to provide day-to-day management of the Client’s Program account[s].

Client Directed Investments

For client directed investments/funds, not recommended by the Adviser and possibly held outside the custodians, the Adviser will provide reporting, administrative and monitoring services for these investments.

Financial Planning/Consulting Services

SW does not offer stand-alone financial planning services. Clients who enter into investment management services agreements with SW have the option to request various other financial planning services from SW, including but not limited to risk management planning, tax planning, retirement planning, estate planning, and/or debt management planning. These optional other financial planning services are provided at no additional cost. However, optional other financial planning services are only provided to investment management services Clients upon request and only after SW has agreed to the request. SW is under no obligation and bears no responsibility to provide all investment

management services clients with optional financial planning services. The following is additional detail on the optional financial planning services that SW may provide (upon request by the client and agreement by SW) to investment management services clients:

- **Risk Management Planning** - Upon request, SW conducts risk management planning for a client. After gathering information provided by the client, SW identifies and analyzes risks relevant to the client. After identification and examination, SW recommends products, tools, and techniques to mitigate, reduce, and/or eliminate the identified risks. This usually includes the client implementing various insurance policies. Examples include, but are not limited to, automobile insurance, commercial insurance, disability insurance, errors & omissions insurance, flood insurance, health insurance, homeowners' or renters' insurance, life insurance, personal articles insurance, and umbrella insurance. Other non-insurance products, tools, and techniques to mitigate, reduce, and/or eliminate the identified risks associated with each client are also recommended to the client if applicable to the client's situation.
- **Tax Planning** – Upon request, SW assists a client with tax planning. After gathering information provided by the client, SW seeks to help the client minimize, reduce, or legally eliminate the various types of taxes imposed upon the client. Various taxes include, but are not limited to, federal, state, and local income taxes, estate taxes, excise taxes, foreign taxes, franchise taxes, payroll taxes, property taxes, real estate taxes, sales taxes, self-employment taxes, and unemployment taxes. There are many strategies and techniques to minimize, reduce, or legally eliminate each type of tax, and SW analyzes each client's distinct situation in order to properly recommend effective and efficient strategies and techniques.
- **Retirement Planning** – Upon request, SW reviews and analyzes a client's current and forecasted retirement scenario. After gathering information provided by the client, SW works with the client to set realistic retirement goals and outline steps and tools that help the client accomplish those goals. SW helps the client achieve sustainable balances of spending and saving during their working years to minimize lifestyle changes between the client's working years and retirement years. Retirement planning by SW usually involves, but is not limited to, calculating annual or monthly retirement savings needs, reviewing current retirement vehicles the client is presently using, reviewing potential retirement vehicles available for use by the client, and presenting to the client simulations and other projections, charts, and tools to help the client visualize their retirement goals, assess their progress toward those goals, and increase their likelihood of achieving those goals.
- **Estate Planning** – Upon request, SW helps clients prepare and arrange for the tax-efficient and cost-efficient disposition of their assets to their desired beneficiaries. After gathering information provided by the client, SW reviews the client's overall situation, including, but not limited to, the titling and location of assets and liabilities, the use of wills, trusts, family limited partnerships, powers of attorney and medical directives, life insurance policies, and the client's state of residency. After review, SW works with the client to determine the client's specific goals. SW then recommends changes intended to benefit the client and the beneficiaries. Typical generic goals include, but are not limited to, helping the client eliminate uncertainties over the administration of a probate, minimizing the costs of estate management (including minimizing asset transfer costs, liability payoff costs, court costs, appraisal costs, accounting and legal costs, as well as estate, gift, and

inheritance taxes), preserving confidentiality, ensuring timely asset transfers, confirming and implementing proper beneficiary designations, and helping the client fulfill any gifting and/or charitable intentions. It should be noted that SW does not practice law, and, therefore, SW works with licensed attorneys to execute estate plans.

- **Debt Management Planning** – Upon request, SW analyzes a client's outstanding debts/liabilities in order to help the client maximize wealth. After gathering information provided by the client, including details on income, assets, and debts/liabilities, which may include, but are not limited to, automobile loans, commercial loans, credit cards, home equity lines of credit, installment loans, lines of credit, margin, medical debts, mortgages, and student loans, SW works with the client to determine the best actions the client should take regarding each debt/liability. SW analyzes the overall impact and risks associated with each individual debt/liability position as well as the overall impact and risks associated with the aggregate debt/liability position given the client's assets, income, age, and other factors. Depending on the scope of the financial planning services requested and mutually agreed upon, SW may also analyze and review with the client the effect the debts/liabilities have on other financial planning areas, such as tax planning and estate planning.

Cryptocurrency Services

Cryptoassets - Our firm offers Cryptoasset planning, and investment management services included as part of our ongoing investment management fees. For clients engaging in investment management service, there is no separate fee for Cryptoassets charged by our firm. [Custodians, exchanges and third parties may include fees for their service.

SW will offer cryptocurrency to clients through the qualified custodian, Gemini (<https://www.gemini.com/>).

Selection of Other Advisers

SW may direct clients to sub-advisers. The client will not be directly engaged with the sub-adviser. SW will enter an agreement with each sub-adviser for sub-advisory services to be provided to SW clients. Each sub-adviser will deduct their management fees directly from the Advisory Client's account(s). Accounts enrolled in the Dynasty managed program will have one combined fee deducted by Dynasty. This combined fee consists of the fee for Dynasty, SW, and SMA (if applicable). Dynasty will remit SW's fees (listed in section 5) to SW and SMA fee (if applicable) to the SMA. SW does not receive any portion of the fees for Dynasty or the SMA (if applicable). Fees are deducted or billed quarterly in advance. SW will always act in the best interests of the client, including when determining which third party manager to recommend to clients. In addition, SW will determine if the sub-adviser is properly licensed, notice filed or exempt from registering with the department prior the manager to any SW clients.

Services Limited to Specific Types of Investments

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

C. Client Tailored Services and Client Imposed Restrictions

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

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

D. Wrap Fee Programs

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

E. Amounts Under Management

As of December 2022, SW manages approximately \$ 169,944,907 in assets on a discretionary basis and did not manage any assets on a non-discretionary basis.

Item 5: Fees and Compensation

A. Fee Schedule

Investment Management Services Fees

The standard annual fee for investment management services is 1% of total assets under management.

The Fee is billed on a quarterly basis, in advance, based upon the market value of the Assets as of the last day of the previous quarter. There may be immaterial differences between the quarter end market value reflected on your custodial statement and the valuation as of the last business day of the calendar quarter used for billing purposes, given timing and account activity. If this Agreement is executed at anytime other than the first day of a calendar quarter, Adviser's fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days during the quarter for which Client was a client of Adviser.

Currently, if more than \$10,000 in Assets are deposited or withdrawn after the beginning of a quarter, the Fee will be prorated based on the number of days remaining in the quarter and adjusted in the following quarter. There may be a time in the future when this amount will increase from \$10,000 to \$50,000 in Assets that are deposited or withdrawn after the beginning of the quarter that an adjustment to the Fee will be made due to the fact of changing operational platforms. If or when this occurs, the Clients will be notified of this change and given the opportunity to discuss further with the firm. The firm will always act in its fiduciary capacity and in the client's best interests when any changes are made.

Negotiability of Fees & Other Terms

We retain the discretion to negotiate or waive all or a portion of our fee, any minimum account size requirement, or other terms related to our relationship with any Client, and to negotiate alternative fees, minimums, or other terms on a Client-by-Client, and service-by-service basis. When negotiating these matters, we usually consider, among other factors, the size of the account, anticipated future fees or other compensation, anticipated future additional assets from the Client or related accounts, and existing or anticipated advisory, referral, or other relationships that may benefit us. The specific terms of each Client's advisory arrangement will be agreed in writing between SW and the Client.

Client Direct Investment Services

For client directed investments/funds, not recommended by the Adviser and possibly held outside the custodians, the Adviser will charge an asset-based charge equal to .50% of the investment value. New investments and accounts will be automatically enrolled in the fee structure and the Adviser will provide an updated list periodically.

Selection of Other Advisers Fees

SW may direct clients to sub-advisers. The client will not be directly engaged with the sub-adviser. SW will enter an agreement with each sub-adviser for sub-advisory services to be provided to SW clients. Each sub-adviser will deduct their management fees directly from the Advisory Client's account(s). Accounts enrolled in the Dynasty managed program will have one combined fee deducted by Dynasty. This combined fee consists of the fee for Dynasty, SW, and SMA (if applicable). Dynasty will remit SW's fees to SW and SMA fee (if applicable) to the SMA. SW does not receive any portion of the fees for Dynasty or the SMA (if applicable). Fees are deducted or billed quarterly in advance. SW will always act in the best interests of the client, including when determining which third party manager to recommend to clients. In addition, SW will determine if the sub-adviser is properly licensed, notice filed or exempt from registering with the department prior the manager to any SW clients.

Managed Account Programs

The Client accounts under the Managed Account Program offered through Dynasty will be charged an advisory fee based upon assets in accordance to the Investment Management Agreement. Dynasty and the Third-Party Manager will charge fees that are separate from this advisory fee. Dynasty's fee will be up to .30% (30 bps) and the Third-Party Manager fee will be up to .20% (20bps). The Client's account statement for the Managed Account Program will most likely reflect a single fee for the program (shared between SW, Dynasty, and/or Third-Party Manager).

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid quarterly in advance. The qualified custodian(s) delivers brokerage account

statements to clients on a monthly basis showing all holdings and activity in the clients' brokerage accounts, including the quarterly fees paid to SW. Upon request from client, SW creates a billing analysis which shows the fee amounts, calculations of the fees, total assets under management, itemization of the assets under management, the time period covered, and contact information for the direction of any questions or comments.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (Third-Party Managers, brokerage commissions, mark-ups and mark-downs on fixed-income transactions, other transaction costs and expenses, fees and expenses charged by mutual funds and exchange traded funds (including, without limitation, transaction costs, 12b-1 fees, and sales charges), fees imposed by variable annuity providers, account maintenance fees, odd-lot differentials, transfer taxes, and wire transfer, electronic fund fees etc0. Those fees are separate and distinct from the fees and expenses charged by SW. Please see Item 12 of this brochure regarding broker/custodian.

D. Prepayment of Fees

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

The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter).

E. Outside Compensation For the Sale of Securities to Clients

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

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

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

Item 7: Types of Clients

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Trusts, Estates, or Charitable Organizations
- ❖ Privately held small business entities

Minimum Account Size

There is an account minimum, \$250,000, which may be waived by the SW.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

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

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

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

Investment Strategies

SW uses both short- and long-term trading.

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

B. Material Risks Involved

Methods of Analysis

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

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

Investment Strategies

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

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

C. Risks of Specific Securities Utilized

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

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

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

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

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

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

Cryptocurrency investing refers to trading in digital or virtual currencies, such as Bitcoin, that are not back by real assets or tangible securities. They are traded between consenting parties with no broker and tracked on digital ledgers commonly known as blockchains. Due to the nature of cryptocurrencies, clients are exposed to the risks normally associated with investing but also unique risks not typical of investing in traditional securities. These risks include, but are not limited to the following:

- **Unregulated** – currently cryptocurrencies are unregulated by both governments and central banks.
- **Increased Price Volatility** – the price of cryptocurrency is constantly fluctuating. Trade or balance can surge or drop suddenly. Price can drop to zero.
- **Trade Execution** – there is a risk that cryptocurrency trades may not be executed at the price and/or time requested due to market volatility, systematic slowdowns, or unexpected technical issues.
- **Susceptible to Error/Hacking** – technical glitches, human error and/hacking can occur, which typically do not affect traditional securities

- Forks – this implies a splitting of the chain on which the cryptocurrency runs, which makes it go in a different direction, with different rules than the existing blockchain.
 - Soft Fork – only a protocol change; the crypto currency still continues to work on the original blockchain rules.
 - Hard Fork – a permanent divergence in the blockchain. This is a radical change to a network’s protocol that effectively results in two branches, one that follows the previous protocol and one that follows the new version.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

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

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

Stephen P. Rhodes is the owner of Katalysis Ventures LLC, a holding company for his personal private investments. His responsibilities include analyzing and overseeing private investment.

2 hours and month during and outside of trading hours are spent on this activity. 0 yearly compensation is expected to be derived from the business.

Stephen P. Rhodes is a licensed insurance agent. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company and its representatives, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of SW are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. SW addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. SW periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. SW will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be tying between business practices and/or services (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any obligation to purchase any insurance product. Insurance products recommended by SW's supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Stephen P. Rhodes is an owner of Signify Business Management LLC.

Signify Business Management LLC, an affiliate of Signify Wealth LLC, is a bookkeeping, and business management firm. From time to time, representatives of Signify Wealth LLC, in their separate capacity as bookkeeper/business manager, will offer clients products from those activities. Clients should be aware that these services pay compensation and thus involve a conflict of interest. Signify Wealth LLC always acts in the best interest of the client. Clients are in no way required to purchase any product or service through any representative of Signify Wealth LLC in such individual's capacities.

Stephen P. Rhodes is an owner of Signify Holding Corporation. Holding Company for Signify Wealth LLC

Stephen P. Rhodes is the co- owner of 12 Enterprises LLC. Business used for buying, repairing and selling real estate properties.

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

SW maintains a business relationship with Dynasty, which provides the Firm access to trading technology, reporting and investments through an open architecture system. The Firm also recommends Dynasty's subsidiary, Dynasty Wealth Management, a registered investment adviser, to clients for its Managed Account Program. While SW believes this open architecture structure for both operational and investment services best serve the interests of its advisory clients, this relationship may potentially present certain conflicts of interest due to the fact that Dynasty retains a portion of the platform or other third-party fees paid by the Firm or clients for the services referenced above. In light of the foregoing, SW seeks at all times to ensure that any material conflicts are addressed on a fully disclosed basis and handled in a manner that is aligned with its clients' best interests. SW does not receive any portion of the fees paid directly to Dynasty, its affiliates or the service providers made available through Dynasty's platform. In

addition, the Firm reviews all such relationships, including the service providers engaged through Dynasty, on a periodic basis in an effort to ensure clients are receiving competitive rates in relation to the quality and scope of the services provided.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

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

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

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

Item 12: Brokerage Practices

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

The Custodian and Brokers We Use

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

How We Select Brokers/Custodians

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

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (see “Products and Services Available to Us from Schwab”)

Your Custody and Brokerage Costs

For our clients’ accounts it maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. This commitment benefits you because the overall commission rates or asset-based fees you pay

are lower than they would be if we had not made the commitment. In addition to commissions [or] asset-based fees Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account.

Products and Services Available to Us from Schwab

Schwab Advisor Services is Schwab’s business serving independent investment advisory firms like us. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as we keep a total of at least \$10 million of our clients’ assets in accounts at Schwab. If we have less than \$10 million in client assets at Schwab, it may charge us quarterly service fees. Here is a more detailed description of Schwab’s support services:

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

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

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

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

- educational conferences and events
- technology, compliance, legal, and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

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

Our Interest in Schwab's Services

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

We will require clients to use Gemini Trust Company, LLC cryptocurrency accounts. Gemini is a fiduciary and qualified custodian under New York Banking Law and is licensed by the State of New York to custody digital assets. Client's crypto assets are held in Gemini accounts only. We only have access to make investment decisions and has no authority to withdraw funds. We use third party research to assess investment opportunities in cryptocurrencies and follows the SEC guidelines to ensure compliance with applicable laws.

B. Aggregating (Block) Trading for Multiple Client Accounts

If SW buys or sells the same securities on behalf of more than one client (including representatives of SW), it might, but would be under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple Clients in order to seek more favorable prices, lower brokerage commissions or more efficient execution. In such case, SW would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. SW would determine the appropriate number of shares to place with brokers and will select the appropriate brokers consistent with SW's duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Reviews of Accounts

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

Client accounts are reviewed on a quarterly basis by the Adviser assigned to the client.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by their designated advisors. There is only one level of review and that is the total review conducted to create the financial plan.

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

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

C. Content and Frequency of Regular Reports Provided to Clients

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

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

Item 14: Client Referrals and Other Compensation

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

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

B. Compensation to Non –Advisory Personnel for Client Referrals

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

Item 15: Custody

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

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

Based on the regulatory definition of custody, Signify Wealth LLC is deemed to have custody over client funds due first to SW's member managers' affiliation with their business management and bookkeeping services firm, Signify Business Management LLC. Signify Business Management LLC usually has authority to initiate transactions from a client's bank accounts. Such authority is usually

granted by the client when signing an agreement with Signify Business Management LLC. To protect Signify Wealth clients, SW has established the following procedures:

- Funds of clients are held at independent banks, brokers/dealers, and/or qualified custodians in separate accounts in the names of the clients.
- Clients receive brokerage account statements monthly directly from the brokers/dealers and/or qualified custodians.
- Clients receive bank account statements monthly directly from the independent banks.
- SW does not authorize or allow any bank account besides the client's primary checking account to be linked to the client's brokerage accounts. Therefore, the only distributions allowed from the client's brokerage accounts are transfers to the client's primary checking account, which is enforced by the qualified custodian.
- SW arranges annual surprise examinations with an Independent Public Accountant

Item 16: Investment Discretion

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

Item 17: Voting Client Securities (Proxy Voting)

For accounts that do not participate in a Managed Account Program, we require the Client to retain responsibility for voting all account securities. We will not vote, exercise rights, make elections, or take other such actions with respect to securities held for accounts we manage. If desired, a Client may instruct us in writing to forward to the Client or a third-party materials we receive pertaining to proxy solicitations or similar matters. Upon our receipt of such written instructions, we will use commercially reasonable efforts to forward such materials in a timely manner. In the absence of the Client's written request, we will discard account proxy and related materials.

Clients may obtain proxy materials by written request to the account's custodian. For information about how to obtain proxy materials from a custodian, Clients may contact us by telephone at 314-222-0295 or by mail sent to the attention of our Chief Compliance Officer at the street address shown on the front of this Disclosure Brochure. However, we will not provide advice about the issues raised by any proxy solicitation or other request for action.

For accounts that participate in a Managed Account Program, authority to vote account securities is usually delegated to the Third-Party Manager or the Sponsor; however, the Client must refer to the terms of his or her specific agreement to determine whether the Client is permitted or required to delegate proxy voting authority to the Sponsor or a Third-Party Manager. These terms will vary by Program and Third-Party Manager.

Similarly, we will not advise or exercise rights, make elections, or take other actions with respect to legal proceedings involving companies whose securities are or were held in the Client's account, including asserting any claims or voting in bankruptcy or reorganization proceedings, or filing "proofs of claim" in class action litigation. If desired, a Client may instruct us in writing to forward to the Client or a third party any materials we receive pertaining to such matters. Upon our receipt of such written

instructions, we will use commercially reasonable efforts to forward such materials in a timely manner. In the absence of the Client's written request, we will discard such materials.

Item 18: Financial Information

A. Balance Sheet

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

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

Due to the economic uncertainties surrounding the current COVID-19 pandemic, SW believed it was prudent to apply for, and accept, the Payroll Protection Program (PPP) loan offered by the Small Business Administration in order to support ongoing operations. SW used the PPP funds to continue payroll for the SW's staff and to make other permissible payments. The loan is forgivable provided SW satisfies the terms of the loan program.

C. Bankruptcy Petitions in Previous Ten Years

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