Form ADV Part 2A: *Firm Brochure*

Item 1 – Cover Page

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Date of Disclosure Brochure: October 29, 2026

This disclosure brochure provides information about the qualifications and business practices of LifeWealth Investments, LLC doing business under the name The LifeWealth Group (also referred to as we and us throughout this disclosure brochure). If you have any questions about the contents of this disclosure brochure, please contact our office at 407-299-4129 or email to Michelle@lifewealthgroup.com. The information in this disclosure brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about The LifeWealth Group is also available on the Internet at www.adviserinfo.sec.gov. You can view our firm's information on this website by searching for LifeWealth Investments, LLC, The LifeWealth Group or our firm's CRD number 332978.

*Registration as an investment adviser does not imply a certain level of skill or training.

Item 2 – Material Changes

We will ensure that you receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after our firm's fiscal year ends. Our firm's fiscal year ends on December 31, so you will receive the summary of material changes no later than April 30 each year. At that time, we will also offer or provide a copy of the most current disclosure brochure. We may also provide other ongoing disclosure information about material changes as necessary.

Since our last filing in March 2026, we have not made material changes but we have made the following updates:

Item 5 – Fees and Compensation

- We have updated our Asset Management fees section to reflect we negotiate all fees which we previously disclosed. We removed the "standard" fee schedule table to clarify this and ensure clients understand fees are negotiated and reflected in their agreements. We review fees with clients during their update meetings.
- We have added information related to estate planning services and our use of a third-party platform for document creation & legal review.

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Item 4 – Advisory Business

LifeWealth Investments, LLC is a Florida limited liability company founded in 2024 with its principal place of business in Florida and is principally owned by Significant Wealth Management, Inc. Hilgardt Lamprecht is the principal owner of Significant Wealth Management, Inc. Mr. Lamprecht founded Significant Wealth Management, d/b/a The LifeWealth Group in 2002 and has focused his practice on holistic wealth management.

- Hilgardt Lamprecht is the Founder and primary control person of The LifeWealth Group. Full details of the education and business background of Mr. Lamprecht are provided in his Form ADV Part 2B Brochure Supplement.

- The LifeWealth Group filed its initial application with the SEC to become registered as an investment adviser in September 2024.

Introduction

The investment advisory services of The LifeWealth Group are provided to you through an appropriately licensed and qualified individual who is an investment adviser representative of The LifeWealth Group (referred to as your investment adviser representative "IAR" or "Advisor" throughout this brochure). The firm focuses on offering holistic wealth management services which may include but are not limited to asset management, investment advice, financial planning, tax planning or estate planning.

Description of Advisory Services

The following are descriptions of the primary advisory services of The LifeWealth Group. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and The LifeWealth Group before we can provide you with the services described below.

Asset Management Services

We offer discretionary asset management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for asset management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information at the beginning of our advisory relationship. We will use the information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice. We may also consult with you about options available to you in your pension plan. As part of our asset management services, we will customize an investment portfolio for you according to your risk tolerance and investing objectives. We may also invest your assets according to one or more model portfolios developed by an unaffiliated investment adviser firm. Once we select a model portfolio, we will monitor your portfolio's performance on an ongoing basis and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary asset management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account and the commissions to be paid to brokerage firms without your approval prior to each transaction.

Discretionary authority is typically granted by the Investment Advisory Agreement you sign with our firm and the appropriate trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing.

Asset Management Services: Sub-Advisors and AE Wealth Management

As part of our investment advisory services, we may use one or more third-party money manager(s) to manage a portion of your account on a discretionary basis. Our firm may utilize the services of various third-party money managers for the management of client accounts, allocating client assets among such managers as appropriate. In such cases, the third-party money managers will be responsible for continuously monitoring client accounts and making trades in client accounts when necessary. While the chosen third-party money manager(s) will provide advice on specific securities and/or other investments in connection with this service, our firm has discretionary authority to hire and fire such managers and reallocate assets among them as deemed appropriate. We will assist you with identifying your risk tolerance and investment objectives, and, in turn, retain third-party money managers in relation to your stated investment objectives and risk tolerance. As a result, we allocate a portion of the total fee charged and collected from you to the third-party money managers, if utilized, as compensation for their direct management of your account.

We have a sub-advisory relationship with AE Wealth Management, LLC ("AEWM") to provide investment advisory services to clients. This arrangement allows us to access model portfolios, model managers, strategists, third-party money manager(s), and trading services through AEWM's managed account program. As part of the AEWM program, you will give us and AEWM discretion to select third party, nonaffiliated investment managers ("Model Managers") to design and manage model portfolios for your assets. If we offer you services through AEWM, we will provide you with a copy of AEWM's disclosure brochure which contains a detailed description of AEWM's services. We will regularly monitor the performance of your accounts managed by AEWM or other third-party money manager(s) and may hire and fire any third-party money manager(s) without your prior approval. AEWM has contracted with an unaffiliated service provider to calculate the fee and instruct the qualified custodian(s) to deduct the fee and pay AEWM and our firm in accordance with your agreement. However, you will not pay anything over and above our firm’s advisory fee in order to receive the third-party money manager’s services unless otherwise agreed in writing.

Wrap Fee Programs

A wrap fee program is a program under which the client pays a single fee that covers both receipt of investment advice and the execution of securities transactions. We serve as portfolio manager to a wrap fee program sponsored by AEWM, which is also available to our clients. In the AEWM program, the advisory fee paid by the client includes custody, trades, management expertise and reporting in a bundled format. A client's total cost of each of the services provided through wrap fee programs could be different if purchased separately. Cost factors may include the client's ability to:

1. Obtain the services provided within the programs separately from any of the mutual fund sponsors,
2. Invest and rebalance the selected mutual funds without the payment of a transaction charge, and
3. Obtain performance reporting comparable to those provided within each program.

When comparing costs, the combination of multiple mutual fund investments, advisory services, custodial and brokerage services available through each program may not be available separately. Clients may be required to have multiple accounts, sign numerous documents and incur various fees. If an account is not

actively traded or the client qualifies for reduced sales charges, the fees in these programs may be more expensive than if utilized separately.

We believe the charges and fees offered within each fee-based program are competitive and reasonable when compared to alternative programs available through other firms and/or investment sources. However, we make no guarantee that the aggregate cost of a particular program is lower than that which may be available elsewhere.

If you participate in a third-party wrap program, it will be on a discretionary basis. The strategies implemented are based on clients' individual investment objectives. If you participate in a wrap fee program, we will provide you with a separate Wrap Fee Program Brochure from AEWM explaining the program and costs associated with the program.

Our Financial Planning recommendations may include investment recommendations. If you choose to implement any recommended transactions away from our firm they may be implemented in a non-wrap program and you may pay separate commissions, ticket charges, and custodian fees.

Financial Planning & Consulting Services

Our firm also provides financial planning & consulting services. Depending on your particular circumstance, such services could include a comprehensive evaluation of your financial situation by using currently known facts and variables, or it might focus on a few items of particular importance to you. Generally, such services will involve preparing a financial plan or rendering a financial consultation for clients based on the client's current situation, financial goals and objectives. The financial planning process is used with clients to discuss the current state of their finances and to establish goals and objectives for the future. The Firm may charge additional fees for planning or consulting services, if charging additional fees we will detail them in the Financial Planning & Consulting agreement you sign with us. Regardless of the nature of the service, the implementation of all recommendations will be at the client's discretion.

A financial plan will address one or more of the following areas:

- *Financial Position:* Understanding of a client's current financial situation.
- *Investment Planning:* Determining the most suitable way to structure investments to meet financial goals, and determine the appropriate account type (e.g., joint tenants, IRA, Roth IRA, etc.)
- *Personal Tax Planning:* Evaluating the current tax situation to help minimize a client's taxes and find more profitable ways to use the extra income generated.
- *Retirement Planning:* Assessing retirement needs to help a client determine how much to accumulate, as well as distribution strategies designed to create a source of income during retirement years.
- *Held Away Assets*: Reviewing and making recommendations on assets not held with our Firm, including retirement plan assets.
- *Insurance Planning and Risk Management:* Evaluating the client's insurance needs and reviewing insurance policies and the like.
- **Estate Planning:* Reviewing the client's cash needs at death, income needs of surviving dependents and estate planning goals.
- *Charitable Planning:* Providing strategic charitable giving plans for clients and researching and evaluating charitable entities and private foundations.
- *Mortgage/Debt Analysis:* Analyzing client's current mortgage debt, home equity, and financing alternatives.
- *Review of Employee Benefit Plans:* Reviewing the client's investment options, allocation models and historical performance of client assets held through employee benefit plans.
- *Biblically Responsible Investing:* Determining the most suitable way to structure investments in

accordance with faith-based biblical values.
- *Cash Management:* Reviewing client's business or personal cash management needs and solutions.

*Please see *Item 5 - Fees and Compensation* for additional information about our offerance of Estate Planning services.

We gather information at an initial meeting which includes interviews and a review of documents provided by the client. Information gathered includes the client's current financial status, future goals, investment objectives, risk tolerance and family circumstances.

Typical financial planning services include one or more of each of the service components. A financial plan could require the services of a specialist such as an insurance specialist, attorney or tax accountant. We will recommend third-party service providers if we feel it is appropriate and in your best interest, but you are under no obligation to use any service provider recommended by us. Likewise, you are under no obligation to act on our financial planning recommendations. We do not receive referral or other fees from third-party service providers.

Financial plans are based on the client's financial situation at the time we present the financial plan to the client, and on the information provided to us. The client must promptly notify us if his/her financial situation, goals, objectives or needs change. Certain assumptions are made with respect to interest rates, inflation rates, and use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. We do not offer any guarantees or promises that a client's financial goals will be met.

Estate Planning

The Firm assists clients with estate planning education, information gathering, identification of planning objectives, asset titling and beneficiary considerations, via the use of a third-party estate planning technology platform. The third-party platform evaluates client-provided information and makes recommendations regarding the types of estate planning documents appropriate for the client's circumstances. The Firm does not select or recommend specific legal documents and does not provide legal advice.

As part of the service, clients are required to utilize the attorney review available through the estate planning platform before finalizing or executing legal documents. The attorney review is intended to address the legal sufficiency and appropriateness of the documents prepared through the platform.

Retirement Plan Rollover Recommendations
To the extent we recommend you roll over your account from a current retirement plan to an individual retirement account ("Rollover Account"), managed by The LifeWealth Group please know that The LifeWealth Group and our investment adviser representatives have a conflict of interest.

We can earn increased investment advisory fees by recommending that you roll over your account at the retirement plan to a Rollover Account managed by The LifeWealth Group. We will earn fewer investment advisory fees if you do not roll over the funds in the retirement plan to a Rollover Account managed by The LifeWealth Group.

Thus, our investment adviser representatives have an economic incentive to recommend a rollover of funds from a retirement plan to a Rollover Account which is a conflict of interest because our recommendation that you open an IRA account to be managed by our firm can be based on our

economic incentive and not based exclusively on whether or not moving the Account to our management program is in your overall best interest.

We have taken steps to manage this conflict of interest. We have adopted an impartial conduct standard whereby our investment adviser representatives will (i) provide investment advice to a retirement plan participant regarding a rollover of funds from the retirement plan in accordance with the fiduciary status described below, (ii) not recommend investments which result in The LifeWealth Group receiving unreasonable compensation related to the rollover of funds from the retirement plan to a Rollover Account, and (iii) fully disclose compensation received by The LifeWealth Group and our supervised persons and any material conflicts of interest related to recommending the rollover of funds from the retirement plan to a Rollover Account and refrain from making any materially misleading statements regarding such rollover.

To the extent we provide you investment advice as a participant in a retirement plan regarding whether to maintain investments and/or proceeds in the retirement plan, roll over such investment/proceeds from the retirement plan to a Rollover Account or make a distribution from the retirement plan, The LifeWealth Group hereby acknowledges our fiduciary obligations to you with regard to our investment advice about whether to maintain, roll over or distribute proceeds from the retirement plan, and as such a fiduciary with respect to its investment advice to you about whether to maintain, roll over or distribute proceeds from the retirement plan.

Our investment advisor representatives shall act with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims, based on the investment objectives, risk, tolerance, financial circumstances, and a client's needs, without regard to the financial or other interests of The LifeWealth Group or our affiliated personnel.

Newsletters, Seminars, and Workshops

The LifeWealth Group occasionally prepares general, educational and informational newsletters. Newsletters are always offered on an impersonal basis and do not focus on the needs of a specific individual. Newsletters are provided to clients and prospective clients free of charge. We may host occasional Seminars for clients or prospective clients. Seminar topics focus on retirement planning issues but can also include other general financial planning topics. Seminars are always offered on an impersonal basis and do not focus on the individual needs of participants. Seminars are offered to clients and prospects free of charge. The LifeWealth Group offers educational workshops throughout the year covering retirement planning and financial planning topics. Attendees may receive a course workbook which further details the topic of discussion. See *Item 5 – Fees and Compensation* for the costs associated with the workshops.

Limits Advice to Certain Types of Investments

The LifeWealth Group can provide investment advice on the following types of investments:

- Mutual Funds
- Exchange Traded Funds (ETFs)
- Exchange-listed Securities
- Securities Traded Over the Counter
- Foreign Issues
- Warrants

- Corporate Debt Securities
- Commercial Paper
- Certificates of Deposit
- Municipal Securities
- Variable Annuities
- Variable Life Insurance
- US Government Securities
- Options Contracts on Securities
- Options Contracts on Commodities
- Futures Contracts on Tangibles
- Futures Contracts on Intangibles
- Interests in Partnerships Investing in Real Estate
- Interests in Partnerships Investing in Oil and Gas Interests
- Securities Properly Exempted from Registration
- Hedge Funds
- Non-Traded Real Estate Investment Trusts (REITs)
- Business Development Companies
- Private Placements or Equities
- Structured Notes
- Donor Advised Funds
- Cash Management Accounts
- Alternative Investments Managers

Although we generally provide advice only on the products previously listed, we reserve the right to offer advice on any investment product that can be suitable for each client's specific circumstances, needs, goals and objectives.

It is not our typical investment strategy to attempt to time the market, but we can increase cash holdings modestly as deemed appropriate based on your risk tolerance and our expectations of market behavior. We can modify our investment strategy to accommodate special situations such as low basis stock, stock options, legacy holdings, inheritances, closely held businesses, collectibles, or special tax situations. *(Please refer to Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss for more information.)*

Tailor Advisory Services to Individual Needs of Clients

The LifeWealth Group advisory services are always provided based on your individual needs. This means, for example, that when we provide asset management services, you are given the ability to impose restrictions on the Accounts we manage for you, including specific investment selections and sectors. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information. Our recommendations are crafted with an individualized, detailed financial plan which takes into consideration your overall investment knowledge and goals.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

When managing client Accounts through our firm's Asset Management Services program, we can manage a client's Account in accordance with one or more investment models. When client Accounts are managed using models, investment selections are based on the underlying model, and generally we do

not develop customized (or individualized) portfolio holdings for every client. However, the determination to use a particular model or models is always based on each client's individual investment goals, objectives and mandates. We may recommend a mixture of investment models and individualized trade strategies or create an individualized portfolio based on what we believe to be in our clients best interests.

Client Assets Managed by The LifeWealth Group

As of December 31, 2025, The LifeWealth Group managed $490,593,143 in assets on a discretionary basis and had $8,662,723 in assets under administration. We do not provide continuous investment management services to assets under administration like we do for our discretionary assets.

Item 5 – Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service can be available from other sources. The exact fees and other terms will be outlined in the agreement between you and The LifeWealth Group.

Fees for Asset Management Services

The total annual advisory fee due to us for Asset Management Services ("Advisory Fee") is negotiable at the sole discretion of our firm based on assets, services, and complexity of client needs. Fees will be outlined in the Investment Advisory Agreement signed by the client and our firm. The maximum annual Advisory Fee charged for these services will be up to 2% of the total assets under management, and will include all fees payable to sub-advisers or third party investment advisers ("TPAs"), unless otherwise agreed by you in a separate written agreement.

Asset Management Fees are typically billed monthly in arrears based on each account's average daily balance during the prior calendar month, depending on the sub-adviser recommended. The calculation for the average daily balance is based on the formula: Average Daily Balance x Client Fee / # of Days in year X # of Invested Days in Month/Quarter. For Example:

Account average daily balance for account: $100,000
Client Fee: 1.30%
Invested January 5th, number of days invested for the month = 26
$100,000 x (130/10,000) / 365 x 26 = $92.60

Fees for Asset Management of retirement plans are typically billed quarterly in arrears based on the period end balance of the prior calendar year and are reassessed annually.

The first monthly or quarterly fee shall be prorated based on the portion of such time period remaining when you sign your agreement with us. When services begin the prorated fee is calculated and billed in arrears during the next billing cycle. Advisory Fees are negotiable and will be deducted from client account(s) by either us or a sub-adviser. In rare cases, our firm will agree to direct bill clients. The fee rate for your accounts will always be reflected in your Investment Advisory Agreement with us.

Fees for Asset Management Services through Third Party Advisors ("TPAs")

Our above fee maximum includes our standard fees for accounts managed by AEWM or sub-advisors we select. The portion of the Advisory Fee payable to the sub-adviser or TPA is established and payable in

accordance with the brochure provided by each TPA to whom you are recommended and our agreement with them. These fees may or may not be negotiable. Because we pay the TPA's advisory fee, our net compensation differs depending upon the individual agreement we have with each TPA. Furthermore, different models made available through TPAs also charge different fees; accordingly, our net compensation also differs depending upon the model selected. Investment Advisory fees incurred by Client may increase when the Client or LifeWealth Group elects to use a TPA. Any fee exceeding those set forth in the Client Fee Disclosure attached hereto shall always be agreed to by the Client in writing prior to being charged.

Nevertheless, because the costs attributable to supporting the use of each TPA and model varies, you should not assume that the use of any TPA or model that results in a higher net compensation to us is necessarily more profitable to us than using a TPA or model that results in a lower net compensation to us. Whenever we recommend a TPA or model that would result in a higher profit to us than a different TPA or model, a conflict of interest arises where our firm or our Associated Persons may have an incentive to recommend one TPA or model with whom we have more favorable compensation arrangements over other advisory programs offered by TPAs with whom we have less favorable or no compensation arrangements. We address this conflict of interest by ensuring our recommendations of TPAs and models are in our client's best interest.

Services provided through AE Wealth Management, LLC ("AEWM") managed account program are offered through a wrap fee program. In a wrap fee program, you will only pay fees based on assets under management and you will not pay a separate commission, ticket charge, or custodian fee, for the execution of transactions in your account. AEWM and our firm will receive a portion of the fee as compensation for services. When services are provided through AEWM, we are generally entitled to the portion of the Advisory Fee remaining after payment of AEWM's portion of the fee, the portion for each model manager, if applicable, and the portion for the custodian. The maximum total Advisory Fee is 2.00%. These annual fees are negotiable and therefore may vary from time to time or client to client. We are responsible for negotiating AEWM's platform fee for wrap accounts with AEWM on behalf of our clients. This presents a conflict of interest, as we have an incentive to negotiate for a lower fee in order to receive a higher percentage of our Advisory Fee. We address this conflict by ensuring our recommendation to use the AEWM platform is in our client's best interest. The actual Advisory Fee charged to you is specified in the Investment Advisory Agreement between you and our firm. A more detailed description of fees related to AEWM's managed account program is located in AEWM's disclosure brochure which will be provided to you if we offer you services through AEWM.

Based on the cumulative value of assets maintained by our firm in the AEWM program, we receive preferential pricing with respect to the fee charged by AEWM to our firm. In order to obtain this preferential pricing we must maintain at least $500 million in assets on the AEWM platform. Furthermore, certain Model Managers on the AEWM platform charge additional fees which are paid by our firm in addition to AEWM's fee. This presents a conflict of interest in that the existence of the $500 million maintenance requirement and additional fees for certain Model Managers creates an incentive for our firm to continue managing clients' assets on the AEWM platform rather than some other platform and to recommend Model Managers on the AEWM platform who do not charge additional fees. We manage this conflict by periodically evaluating and assessing whether maintaining assets on the AEWM platform is in the clients' best interest, taking into consideration the quality of the services provided by AEWM for the clients' benefit, or available to our firm via the platform in connection with services we provide to our clients, costs to the client and other factors. Additionally, we will take steps to assure our recommendations regarding particular Model Managers are based on the needs of the clients and the suitability of the Model Manager recommended, rather than the cost to us of making that recommendation.

AEWM also makes available to us certain other alternative ways for our clients to participate in its platform. Alternatives offered to us by AEWM that would result in our firm receiving a higher percentage of its Advisory Fee (i.e.., by paying a lower fee to AEWM), include the ability to manage your assets in models of our own design (our in house asset management services), the ability to hold certain assets in accounts that charge transaction fees on a transaction-by-transaction basis ("transaction-based accounts"), and access to certain mutual funds managed by AEWM. We typically only utilize these alternatives in the form of our in house asset management services or access to various donor advised funds.

Because our clients do not pay transaction fees, it would not benefit our clients for us to determine whether asset-based or transaction-based pricing is more expensive. Rather, it would only benefit our firm to pay lower transaction fees. However, in order to simplify our business model and eliminate the need for continuous analysis of which transaction pricing models are most profitable to our firm, we have adopted a policy of using only asset-based pricing, which carries a platform fee that is higher than what we would pay for transaction-based pricing. In the absence of this policy, in some situations we would have an incentive to minimize our transaction costs by placing assets in transaction-based accounts and to reduce trading in those accounts. Our policy to use asset-based pricing exclusively eliminates any incentive to recommend those types of accounts to our clients, or to manage the accounts in that manner.

Our receipt of an asset-based fee presents a conflict of interest. This is because the more assets there are in the client's account, the more the client will pay in fees. Therefore, we have an incentive to encourage clients to increase the assets in their accounts. We address this conflict of interest by ensuring any such recommendations are in the client's best interest.

Financial Planning & Consulting Fees

Financial Planning fees are negotiated based on the scope of services to be provided and will be detailed in your Financial Planning & Consulting Agreement with us. Fees must be paid via check or our firm's digital payment platform. Upon completion of the agreed upon services the fee is considered earned by the firm and any unpaid amount is due.

If you terminate the financial planning and consulting services after entering into an agreement with us and the IAR did not waive your fees, you will be responsible for immediate payment of any financial planning and consulting services performed by the firm prior to our receipt of your notice of termination.

Estate Planning Fees

We typically charge flat fee amounts for Estate Planning services and will negotiate fees based on the scope of services and client needs. Fees are billed in accordance with your Agreement with us.

Held Away Asset Consulting Fees

Held Away Asset Consulting fees are negotiated based on the scope of services to be provided and will be detailed in your Financial Planning & Consulting Agreement with us. Most fees are structured as a % of the held away assets billed using the method and frequency outlined in our Agreement with you. Fees must be paid via check or our firm's digital payment platform.

When you utilize Flourish Cash accounts, Flourish will deduct Fees for the Flourish account from the interest paid to your account prior to interest posting and remit the payment directly to us.

Fees for Workshops

From time to time, The LifeWealth Group will charge a minimal fee, as needed, due to costs associated with the content of the workshop and/or course workbook. Costs associated with workshops will be disclosed to you at the time you register for the workshop and may be assessed afterwards, without additional notice.

Other Fee Terms

You should notify The LifeWealth Group within ten (10) days of receipt of an invoice if you have questions about or dispute any billing entry.

When we utilize donor advised funds, the fund may charge additional fees, separate from our advisory fee. Each donor advised fund has its own unique fee structure and/or fee limits. Because of this some donor advised fund accounts may have higher total combined fees than our standard 2% limit. Please review the fee schedules from our firm, and the donor advised fund, to see all fees associated with these accounts.

All fees paid to LifeWealth Group for advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each mutual fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

Clients incur certain charges imposed by custodians, brokers, and other third parties such as administrative custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Please refer to Item 12 (Brokerage Practices) in this Brochure for additional information.

Client with non-discretionary "Client Managed" accounts, AEWM will charge an annual administrative fee, billed monthly based on the number of days in the month.

All fees paid to LifeWealth Group for services are separate and distinct from the commissions, fees, and expenses charged by insurance companies associated with any disability insurance, life insurance, and annuities subsequently acquired by you. If you sell or liquidate certain existing securities positions to acquire any insurance or annuity, you may also pay commissions, fees, and expenses charged by the insurance company for subsequently-acquired insurance and/or annuities in addition to the financial planning and consulting fees paid to LifeWealth Group for Advisory Services. Please see *Item 10* of this brochure for more information about our outside professional activities.

To the extent The LifeWealth Group engages an outside professional (i.e., attorney, independent investment adviser or Accountant) while providing advisory services to you, The LifeWealth Group will be responsible for the payment of the fees for the services of such an outside professional, and you will not be required to reimburse The LifeWealth Group for such payments. To the extent that you personally engage such an outside professional, you will be responsible for the payment of the fees for the services of such an outside professional, and The LifeWealth Group will not be required to reimburse Client for such payments. Fees for the services of an outside professional (i.e., attorney, independent investment adviser or Accountant) will be in addition to and separate from the fees charged by The LifeWealth Group, and you will be responsible for the payment of the fees for the services of such an outside professional. In no event will the services of an outside professional be engaged without your express approval. Please see *Item 10* of this brochure for more information about our outside professional activities.

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

Performance-based fees are defined as fees based on a share of capital gains on or capital appreciation of the assets held in a client's Account. *Item 6* is not applicable to this Disclosure Brochure because we do not charge or accept performance-based fees.

Item 7 – Types of Clients

The LifeWealth Group generally provides investment advice to the following types of clients:

- Individuals
- High net worth individuals
- Businesses
- Retirement Plans

You are required to execute a written agreement with The LifeWealth Group specifying the particular advisory services in order to establish a client arrangement with The LifeWealth Group.

Minimum Investment Amounts Required

The LifeWealth Group typically requires a minimum of $500,000 in order to open an Account. To reach this Account minimum, clients can aggregate all household Accounts. Exceptions can be granted to family members and long-standing clients and referrals in the sole discretion of The LifeWealth Group.

AEWM or other sub-advisors we recommend may have minimum account and minimum fee requirements in order to participate in their programs. AEWM will disclose its minimum account size and fees in its Form ADV Part 2A Disclosure Brochure and Appendix 1.

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

Methods of Analysis

The LifeWealth Group uses the following methods of analysis in formulating investment advice:

Charting - This is a set of techniques used in technical analysis in which charts are used to plot price movements, volume, settlement prices, open interest, and other indicators, in order to anticipate future price movements. Users of these techniques, called chartists, believe that past trends in these indicators can be used to extrapolate future trends.

Charting is likely the most subjective analysis of all investment methods since it relies on proper interpretation of chart patterns. The risk of reliance upon chart patterns is that the next day's data can always negate the conclusions reached from prior days' patterns. Also, reliance upon chart patterns bears the risk of a certain pattern being negated by a larger, more encompassing pattern that has not shown itself yet.

Fundamental – This is a method of evaluating a security by attempting to measure its intrinsic value by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and individually specific factors (like the financial condition and management of a company). The end goal of

performing fundamental analysis is to produce a value that an investor can compare with the security's current price in hopes of figuring out what sort of position to take with that security (underpriced = buy, overpriced = sell or short). Fundamental analysis is considered to be the opposite of technical analysis. Fundamental analysis is about using real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for just about any type of security.

The risk associated with fundamental analysis is that it is somewhat subjective. While a quantitative approach is possible, fundamental analysis usually entails a qualitative assessment of how market forces interact with one another in their impact on the investment in question. It is possible for those market forces to point in different directions, thus necessitating an interpretation of which forces will be dominant. This interpretation may be wrong and could therefore lead to an unfavorable investment decision.

Technical – This is a method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance.

Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Investment Strategies

The LifeWealth Group may employ the following investment strategies when managing client assets and/or providing investment advice:

Long term purchases. Investments held at least a year.

Short term purchases. Investments sold within a year.

Value Investing. Value Investing can be described as a strategy of selecting stocks that trade for less than their intrinsic values. Value investors typically seek stocks of companies that they believe the market has undervalued. They believe the market overreacts to good and bad news,

resulting in stock price movements that do not correspond with the company's long-term fundamentals. The result is an opportunity for value investors to profit by buying when the price is deflated. Often, value investors select stocks with lower-than-average price-to-book or price-to-earnings ratios and/or high dividend yields. The risks associated with value-investing include incorrectly analyzing and overestimating the intrinsic value of a business, concentration risk, under performance relative to major benchmarks, macro-economic risks, investing in value traps i.e., businesses that remain perpetually undervalued, and lost purchasing power on cash holdings in the case of inflation.

Tactical asset allocation. Allows for a range of percentages in each asset class (such as Stocks = 40-50%). The ranges establish minimum and maximum acceptable percentages that permit the investor to take advantage of market conditions within these parameters. Thus, a minor form of market timing is possible, since the investor can move to the higher end of the range when stocks are expected to do better and to the lower end when the economic outlook is bleak.

Strategic asset allocation. Calls for setting target allocations and then periodically rebalancing the portfolio back to those targets as investment returns skew the original asset allocation percentages. The concept is akin to a “buy and hold” strategy, rather than an active trading approach. Of course, the strategic asset allocation targets may change over time as the client’s goals and needs change and as the time horizon for major events such as retirement and college funding grow shorter.

Investment Model Strategies. The LifeWealth Group has created proprietary Model Portfolios. Based on the information you provide us, we consider multiple time horizons (long, medium and short-term) when determining investment strategies. Depending on our clients’ needs, we may recommend one or several of our investment management models.

In the development and management of our Model Portfolios, The LifeWealth Group uses industry standard techniques that include technical analysis, fundamental analysis and charting. We may engage various types of execution tactics such as long term and short-term buys and value investing as well as asset allocation strategies to achieve the Model Portfolios’ objectives. Each model engages in its own type of techniques, execution tactics and use of research tools to enhance the ability to manage its assets effectively to its stated philosophy. The LifeWealth Group actively manages each model’s investment objective, driven by its investment philosophy and style.

Primarily Recommend One Type of Security

We do not primarily recommend one type of security to clients. Instead, we recommend any product that may be suitable for each client relative to that client’s specific circumstances and needs.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that the future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- Alternative Investments Risk – Alternative investments typically do not correlate to the stock market, which means they can be used to add diversification to a portfolio and help mitigate volatility. Alternative Investments can be illiquid due to restrictions on transfer and the lack of a secondary trading market. These investments may lack transparency as to share price, valuation, and portfolio holdings. Complex tax structures often result in delayed tax reporting. Compared to mutual funds, private funds are subject to less regulation and often charge higher fees. Alternative investments encompass a broad array of strategies, each with its own unique return and risk characteristics to be considered on a case-specific basis.
- Collateralized Loan Obligation ("CLO") Risk – A CLO is a single security backed by a pool of debt. That pool of debt often consists of a bundle of corporate loans that are ranked below investment grade. CLOs are securities subject to credit, liquidity, and interest rate risks. The investor will receive scheduled debt payments from the underlying loans, assuming most of the risk if the borrowers of those loans default. A CLO usually has multiple "tranches." Each tranche is a piece of the CLO, and the order of the tranches dictates in what order the investors will be paid when the underlying loan payments are made. The tranches also dictate the associated risk since investors who are paid last have the highest overall risk of loss. Those paid first have less risk and are therefore paid smaller interest payments—whereas those paid last receive higher interest payments to compensate for the risk.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as an unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Cybersecurity Risk – With the increased use of technologies to conduct business, companies are susceptible to operational, information security, and related risks. In general, information and cyber-incidents can result from deliberate attacks or unintentional events and arise from external or internal sources. Cyber-attacks include unauthorized access to digital systems (such as through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information; corrupting data, equipment, or systems; or causing operational disruption. Cyber-attacks may also be carried out in a manner that does not require gaining unauthorized access, such as causing denial of service attacks on websites (making network services unavailable to intended users). Cyber-incidents may cause disruptions and affect business operations, potentially resulting in financial losses, impediments to trading, the inability to transact business, destruction to equipment and systems, violations of applicable privacy and other laws, regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs.

- Duration Risk – Duration is a way to measure a bond's price sensitivity to changes in interest rates. The duration of a bond is determined by its maturity date, coupon rate, and call feature. Duration is a method to compare how different bonds will react to interest rate changes. For example, if a bond has a duration of five (5) years, it means that the value of that security will decline by approximately five percent (5%) for every one percent (1%) increase in interest rates.
- Emerging Markets Risk – The risks associated with foreign investments are heightened when investing in emerging markets. The governments and economies of emerging market countries may show greater instability than those of more developed countries. Such investments tend to fluctuate in price more widely and to be less liquid than other foreign investments.
- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- International Investing Risk – International investing, especially in emerging markets, involves special risks, such as currency exchange and price fluctuations and political and economic risks.
- Interval Fund Risk – Interval funds are classified as closed-end funds, but they are distinct because the shares do not trade on the secondary market, but instead periodically the fund offers to buy back a percentage of outstanding shares at net asset value. This results in the funds being largely illiquid. There is no guarantee that investors will be able to sell their shares at any given time or in the desired amount. Additionally, repurchase is done on a pro-rata basis; therefore, there is no guarantee you can redeem the number of shares you want during a given redemption.
- Liquidity Risk – Liquidity is how easily an asset or security can be bought or sold in the market and converted to cash. Generally, the less liquid an asset is, the greater the risk that if an investor needed to sell the asset quickly, the asset will be sold at a loss. Simple assets tend to be more liquid than complex assets. An asset tends to be more liquid if it represents a standardized product or security and there are many traders interested in making a market in that product or security. Some investments, like Qualified Opportunity

Zone Funds, are considered private investments and are illiquid because there is no public market that currently exists for the investment type. Therefore, the inability to quickly sell or liquidate this investment carries a higher risk for a loss in the investment.

- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.
- Margins Risk – A margin transaction occurs when an investor uses borrowed assets by using other securities as collateral to purchase financial instruments. The effect of purchasing a security using margin is to magnify any gains or losses sustained by the purchase of the financial instruments on margin. Margin trading involves interest charges and risks, including the potential to lose more than deposited or the need to deposit additional collateral in a falling market. Some Sub-Advisor strategies may require the use of margin accounts.
- Options Risk. Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.
- Private Investments Risk – A private investment is a financial asset outside public market assets, meaning they are not listed on an exchange. Investors often access private investments through a private investment fund. A private investment fund is an investment company that doesn't solicit capital from retail investors or the public. Hedge funds and private equity funds are two of the most common types of private investment funds. Private equity investing often has high investment minimums and they may also have higher liquidity risks since private equity investors are expected to invest their funds with the firm for several years, on average. Investors often utilize private investments to diversify their portfolio and reduce overall risk exposure across specific sectors. However, because there is no major public exchange for these investments, a fund manager may find it difficult to liquidate the investments in a fund in times of economic stress.
- REITs and Real Estate Risk – Real estate investment trusts (REITs) are popular investment vehicles that pay dividends to investors. The value of an investment in REITs may change in response to a change in the real estate market. REITs may subject an investment to additional risks such as decline in the value of real estate, changes in interest rates may result in lack of available mortgage funds or other capital and financing limits, extended vacancies of properties, increases in property taxes and operating expenses, and changes in zoning laws and regulations. When traded like shares of stock on exchanges, REITs can give exposure to diversified real estate holdings.
- Structured Notes Risk – Structured notes are complex instruments consisting of a bond component and an imbedded derivative component that adjusts the security's risk-return profile. There are both principal-at-risk and principal-protected notes. Principal-protected notes offer full principal protection, subject to the credit risk of the issuer, even if the market is down at the note's maturity. Principal-at-risk notes offer no principal protection, and an investor can lose some or all of their invested principal at maturity. A structured note will result in loss of principal if the reference asset declines by more than the stated buffer or barrier level, either at maturity, or on a scheduled observation date. Structured notes are classified as senior unsecured debt and are therefore subject to the risk of default. They lack liquidity, are not listed on securities exchanges, and do not participate

in dividends. Typically, the issuer will maintain a secondary market; but there is no obligation to do so. Therefore, there may be little to no secondary market available. To the extent a secondary market may exist, a sale in the secondary market prior to maturity may result in a significant discount in the sale price of the note resulting in a loss of principal. Structured notes are also subject to credit and call risks. The credit risk involves a situation where, if the issuer were to default on its payment obligations, you may not receive any amount owed under the structured note and you could lose your entire principal investment. Certain notes may be callable automatically or at the option of the issuer. If a note is called, the investor will not receive any interest payments that would have been payable for the remainder of the term of the note. Depending on the nature of the linked asset or index, the market risk of the structured note may include changes in equity or commodity prices, changes in interest rates or foreign exchange rates, or market volatility. After issuance, structured notes may not be re-sold on a daily basis and thus may be difficult to value given their complexity.

Item 9 – Disciplinary Information

Our firm and our financial professionals are 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. Information regarding our firm and associated persons is always available by searching the firm or individuals name on the Investment Adviser Public Disclosure website: https://adviserinfo.sec.gov/.

Hilgardt Lamprecht, CEO and President of The LifeWealth Group has a history of customer disputes which are disclosed in his individual ADV Part 2B brochure supplement. The firm has no other disciplinary information which would be material to a client's evaluation of us.

Item 10 – Other Financial Industry Activities and Affiliations

The LifeWealth Group is **not** and does **not** have a related person that is a broker/dealer, municipal securities dealer, government securities dealer or broker, an investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund), another investment adviser or financial planner, a futures commission merchant, commodity pool operator, or commodity trading advisor, a banking or thrift institution, or a sponsor or syndicator of limited partnerships.

The LifeWealth Group does have Investment Advisor Representatives, including control persons, who are engaged in separate business activities as an Accountant or Accounting firm, a lawyer or law firm, an insurance company or agency, a pension consultant, a real estate broker or dealer, a business consultant, or as Investment Advisor Representatives of an unaffiliated investment adviser.

Clients are never under any obligation to utilize outside services or products which may be offered by their advisors in these separate capacities. All outside activities of your advisor are disclosed in their individual brochure supplement (ADV 2B) along with any conflicts of interest such activities may present. Compensation received as part of an outside activity is separate from and in addition to the Advisory Fees you pay us for Advisory Services. Please refer to *Item 5 – Fees and Compensation* for information regarding fees our firm charges for Advisory Services.

Insurance Product Recommendations

Through our affiliate Significant Wealth Management, d/b/a The LifeWealth Group, our financial representatives can sell other products or provide services outside of their role as investment adviser representatives with us.

Due to the firm's financial planning philosophy, it is common for our financial professionals to recommend that clients utilize insurance products (for example, a fixed index annuity ("FIA")) as part of the client's overall financial plan in lieu of separately managed accounts (specifically, in lieu of cash and fixed income asset classes). You should be aware that there are a number of conflicts of interests that are present due to our planning philosophy and recommendations to utilize insurance products in this nature.

As an estimate, our financial professionals that are registered as investment advisor representatives spend approximately 50% of their time on insurance sales and services and 50% of their time on investment advisory services in the future. Please refer to Item 5 – Fees and Compensation and Item 14 – Client Referrals and Other Compensation for more details.

You may therefore work with your financial professional in both their capacity as an investment adviser representative of LifeWealth Investments, as well as in their capacity as an insurance agent through our affiliate Significant Wealth Management. As such, your LifeWealth Investments financial professional, in their dual capacity as an IAR and insurance agent, may advise you to purchase insurance products (general disability insurance, life insurance, annuities, and other insurance products to you), and then assist you in implementing the recommendations by selling you those same products through our affiliated insurance agency. For the reasons described below, this creates a variety of conflicts of interest that you should be aware of.

- Commissions: Although LifeWealth Investments, LLC and its investment adviser representatives owe you a fiduciary duty, it should be noted that the receipt of a commission provides a variety of incentives for our affiliate and our shared financial professionals to recommend these products. For example, your financial professional will earn a larger commission the more assets are invested in an annuity, therefore they are economically incentivized to recommend that you purchased an annuity over placing those assets in a brokerage or advisory account, which may provide lower total compensation. Our financial professional could also be incentivized to recommend a product that pays a commission now, versus an advisory product that pays fees over a longer period of time. As an example, all other variables held equal, a 5% commission paid by an insurance company upon sale of a $100,000 annuity product, may be more attractive to a financial professional than a one percent (1%) advisory fee charged on a $100,000 account paid over a period of five (5) years, despite the overall pre-tax compensation paid to the financial professional being equal. Note that some products pay a higher street or bonus commission than others, increasing this incentive and creating an economic incentive to favor higher fee-paying products.
- **Additional Compensation:** Significant Wealth Management, its affiliates, and our shared financial professionals also receive additional compensation or incentives in the form of bonus commissions, gifts, meals or entertainment, reimbursement for training, marketing, education, advertising, or travel expenses associated with sponsored conferences or events. The exact compensation cannot be accurately calculated at the time of recommendation because they rely on sales goals, but you should be aware that there are a variety of forms of indirect compensation paid by carriers and insurance marketing organizations, and this compensation creates a conflict of interest.
- In addition, each of the individual insurance carriers that our financial professionals work with may also separately provide incentive-based bonuses or awards in exchange for sales-related production over specific periods of time, which is a conflict of interest. They may also provide indirect compensation by providing marketing assistance, business development tools, technology, back office/operations support, business succession planning, business conferences,

and incentive trips. These incentive programs do not directly affect fees paid by the client. Although some of these services can benefit a client, other services obtained by our IARs such as marketing assistance, business development, and incentive trips, will not benefit an existing client and is a conflict of interest.

- At times, our financial professionals receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are the result of informal expense sharing arrangements in which product sponsors will underwrite costs incurred for marketing, such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of clients.

- **Exchanges & Replacement Recommendations:** Your financial professional may recommend that you exchange or replace an existing annuity with a new annuity if they believe it is appropriate. You should be aware that the firm and financial professional receive additional commission when an exchange or replacement is made, in the form of commissions and bonuses, and other additional compensation described above. You may also incur a surrender charge on the old annuity. The new purchase be also subject to the commencement of a new surrender period, lose existing benefits, such as accumulated value, death, living or other contractual benefits, or be subject to increased fees, or additional charges for riders and similar product enhancements.

- **Other Issues:** There are other conflicts present as well. LifeWealth and its insurance agency Significant Wealth Management utilize the services of a third-party insurance marketing organization ("IMO") to select the appropriate product for our clients. The purpose of the IMO is to assist us in finding the insurance product that best fits the client's situation, although the IMO and insurance carrier may also offer special bonus or incentive compensation to our firm and our investment adviser representatives when they act in their separate capacities as insurance agents when they meet certain overall sales goals by placing annuities and/or other insurance products through the IMO. This creates a conflict of interest for the firm and our financial professionals in utilizing the products recommended by the IMO.
- The IMO is also a related company of AE Wealth Management. The IMO provides affiliate members such as our firm, LifeWealth Investments, with marketing assistance and business development tools to acquire new clients, technology with the goal of improving the client experience and our firm's efficiency, back office and operations support to assist in the processing of our insurance (through the IMO) and investment advisory services (through AE Wealth Management) for clients. Although some of these services may directly benefit a client, other services obtained by us from Advisors Excel such as marketing assistance and business development may not benefit an existing client. There is a conflict of interest when we use the sub-adviser and financial planning services of AE Wealth Management because we are influenced to use AE Wealth Management based upon our relationship and services provided and support of the IMO.

The sale of commission-based products is supervised by the firm's Chief Executive Officer, and the firm makes periodic reviews of its insurance recommendations to ensure that our financial professionals act in accordance with our fiduciary duty. If you have any questions or concerns about annuity recommendations made during the financial planning process, we encourage you to immediately bring them to the attention of the Chief Executive Officer or the CCO.

Finally, you should be aware that there are other insurance products that are offered by other insurance agents other than those recommended by our financial professionals. You are under no obligation to implement any insurance or annuity transaction through The LifeWealth Group or our affiliate Significant Wealth Management.

Registered Representatives of a Broker Dealer

Some IARs of our firm may also be registered with independent broker-dealers as registered representatives. This presents a conflict of interest in that our IARs may be financially incentivized to recommend commissionable brokered products to you. Information about if your advisor is registered with a broker-dealer can be found in their ADV 2B brochure supplement.

Accounting Services

Some IARs of our firm may also be Certified Public Accountants, Enrolled Agents, Accountants, Bookkeepers or Tax Preparers. Information about if your advisor is engaged in this type of activity can be found in their individual ADV 2B brochure supplement.

Legal Services; Estate Planning

Some IARs of our firm may also be Attorneys or other Legal Professionals. While we may include estate planning as part of our financial planning advisory services some of our IARs may offer additional legal services through their separate business activity. Information about if your advisor is engaged in this type of activity can be found in their ADV 2B brochure supplement.

Real Estate Businesses or Services

Some IARs of our firm may also be Realtors, Mortgage Brokers or other Real Estate related Professionals. Information about if your advisor is engaged in this type of activity can be found in their individual ADV 2B brochure supplement.

Broker of Business Successions

Hilgardt Lamprecht operates a separate business as a Broker for Business Successions through LifeWealth Transition Partners. In this capacity Mr. Lamprecht provides services including, but not limited to Exit Planning; Clarifying Exit Objectives, Maximizing & Protecting Business Value; Identifying a Successor Target; Assisting with negotiations with successor; Business Continuity Planning; and advanced tax planning prior to sale of business. Additional information about this activity can be found in his individual ADV 2B brochure supplement.

LifeWealth Transition Partners Affiliation and Related Conflicts of Interest

LifeWealth Investments, LLC ("LWI") is affiliated through common ownership and control with LifeWealth Transition Partners ("LWTP"), a business consulting and business transition advisory firm. Through LWTP, Hilgardt Lamprecht and other associated persons provide business succession planning, exit planning, business transition consulting, business valuation coordination, merger and acquisition support, business continuity planning, and related services to business owners.

Certain clients of LWI also engage LWTP for separate business transition and consulting services. Fees for LWTP services are separate from and in addition to the advisory fees paid to LWI. Compensation received through LWTP consists of consulting fees and project-based fees associated with business transition engagements.

This arrangement creates a conflict of interest because LWI and its associated persons have a financial incentive to recommend or discuss services offered through LWTP. Recommendations made during the financial planning, retirement planning, estate planning, investment management, or business succession planning process can influence a client's decision to engage LWTP. Likewise, business owners who engage LWTP are often introduced to LWI for investment advisory services following a business transition event.

Business transition recommendations can impact the amount of assets available for investment management, advisory fees, estate planning strategies, charitable planning strategies, and other services provided by LWI. As a result, recommendations involving the timing, structure, or implementation of a business transition present potential competing financial interests between the client and the affiliated entities.

Clients are under no obligation to engage LWTP or any affiliated company and are free to obtain comparable services from unaffiliated third-party consultants, business brokers, investment bankers, valuation professionals, attorneys, accountants, or other professionals of their choosing. A client's decision whether to engage LWTP does not affect the quality, availability, or terms of advisory services provided by LWI.

LWI addresses these conflicts by disclosing the affiliation, requiring recommendations to be made in the client's best interest, and maintaining policies and procedures reasonably designed to identify, disclose, and mitigate conflicts of interest. Any recommendation to utilize LWTP services is based on the client's specific circumstances, goals, and objectives rather than the compensation received by LWI, LWTP, or their associated persons.

Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Summary

An investment adviser is considered a fiduciary and has a fiduciary duty to all clients. The LifeWealth Group has established a Code of Ethics to comply with the requirements of the securities laws and regulations that reflects its fiduciary obligations and those of its supervised persons. The Code of Ethics also requires compliance with federal securities laws. The LifeWealth Group' Code of Ethics covers all individuals that are classified as "supervised persons". All employees, officers, directors and investment adviser representatives are classified as supervised persons. The LifeWealth Group requires its supervised persons to consistently act in your best interest in all advisory activities. The LifeWealth Group imposes certain requirements on its affiliates and supervised persons to ensure that they meet the firm's fiduciary responsibilities to you. The standard of conduct required is higher than ordinarily required and encountered in commercial business.

This section is intended to provide a summary description of the Code of Ethics of The LifeWealth Group. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Affiliate and Employee Personal Securities Transactions Disclosure

The LifeWealth Group or supervised persons of the firm can buy or sell for their personal accounts investments identical to those recommended to clients. This creates a conflict of interest. It is the express policy of The LifeWealth Group that all persons supervised in any manner by our firm must place

clients' interests ahead of their own when implementing personal investments. As is required by our internal procedures manual, The LifeWealth Group and its supervised persons will not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, by information obtained as a result of employment or association with our firm unless the information is also available to the investing public upon reasonable inquiry.

We are now and will continue to be in compliance with applicable state and federal rules and regulations. To prevent conflicts of interest, we have developed written supervisory procedures that include personal investment and trading policies for our representatives, employees and their immediate family members (collectively, supervised persons). Any supervised person not observing our policies is subject to sanctions up to and including termination.

Item 12 – Brokerage Practices

Best execution does not necessarily mean that clients receive the lowest possible commission costs but that the qualitative execution is best. In other words, all conditions considered, the transaction execution is in your best interest. When considering best execution, we look at a number of factors besides prices and rates including, but not limited to:

- Execution capabilities (e.g., market expertise, ease/reliability/timeliness of execution, responsiveness, integration with our existing systems, ease of monitoring investments)
- Products and services offered (e.g., investment programs, back-office services, technology, regulatory compliance assistance, research and analytic services)
- Financial strength, stability and responsibility
- Reputation and integrity
- Ability to maintain confidentiality

We exercise reasonable due diligence to make certain that best execution is obtained for all clients when implementing any transaction by considering the back-office services, technology and pricing of services offered.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

Currently, we require the use of Fidelity or Charles Schwab as your qualified custodian ("Custodians"). This decision is based on our participation in the Fidelity Institutional Wealth Services and Schwab Institutional programs. For AEWM Programs, Fidelity will also be used as the qualified custodian. These Custodians provide The LifeWealth Group with access to their institutional trading and custody services, typically not available to retail investors. The services from our Custodians include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

The Custodians and AEWM also make available to The LifeWealth Group other products and services that we benefit from but may not benefit your Accounts. Some of these other products and services assist us in managing and administering client Accounts. These include software and other technology that:

- Provide access to client Account data (such as trade confirmation and Account statements)
- Facilitate trade execution (and allocation of aggregated trade orders for multiple client Accounts)
- Provide research, pricing information and other market data
- Facilitate payment of our fees from client Accounts

- Assist with back-office functions, recordkeeping and client reporting.

Many of these services generally may be used to service all or a substantial number of our Accounts. Custodians also make available other services intended to help us manage and further develop our business. These services can include:

- Consulting, publications and conferences on practice management
- Information technology
- Business succession
- Regulatory compliance
- Marketing.

In addition, the Custodians will make available, arrange and/or pay for these types of services rendered to The LifeWealth Group by independent third parties providing these services to us. As a fiduciary, we endeavor to act in your best interest. Our requirement that you maintain your assets in Accounts at these Custodians may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Fidelity or Schwab. This creates a conflict of interest.

You are under no obligation to act on our recommendations. You may select a broker/dealer or Account custodian other than Fidelity or Schwab, although in this case we cannot assist you with asset management services.

Directed Brokerage

Clients should understand that not all investment advisors require the use of a particular broker/dealer or custodian. Some investment advisors allow their clients to select whichever broker/dealer the client decides. By requiring clients to use a particular broker/dealer, The LifeWealth Group may not achieve the most favorable execution of client transactions and the practice requiring the use of specific broker/dealers can cost clients more money than if the client used a different broker/dealer or custodian. However, for compliance and operational efficiencies, The LifeWealth Group has decided to require our clients to use broker/dealers and other qualified custodians determined by The LifeWealth Group.

Block Trading Policy

We may elect to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by our firm when The LifeWealth Group believes such action may prove advantageous to clients. If and when we aggregate client orders, allocating securities among client Accounts is done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently.

The LifeWealth Group uses the pro rata allocation method for transaction allocation. Under this procedure, pro rata trade allocation means an allocation of the trade at issue among applicable advisory clients in amounts that are proportional to the participating advisory client's intended investable assets. The LifeWealth Group will calculate the pro rata share of each transaction included in a block order and assign the appropriate number of shares of each allocated transaction executed for the client's Account.

If and when we determine to aggregate client orders for the purchase or sale of securities, including securities in which The LifeWealth Group or our associated persons may invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* Neither we nor our associated persons receive any additional compensation as a result of block trades.

Item 13 – Review of Accounts

Account Reviews and Reviewers

Managed Accounts are reviewed at least annually but reviews may occur more frequently based on your IARs assessment of your financial needs and investment strategy. While the calendar is the main triggering factor, reviews can also be conducted at your request. Account reviews will include investment strategy and objectives review and making a change if strategy and objectives have changed. Reviews are conducted by your Advisor on record, with reviews performed in accordance with your investment goals and objectives.

Statements and Reports

For our asset management services, you are provided with transaction confirmation notices and regular quarterly Account statements in writing directly from the qualified custodian. Additionally, The LifeWealth Group may provide position or performance reports to you quarterly and upon request. Financial Planning clients receive reports as agreed in the Financial Planning Agreement with us which may or may not be ongoing.

You are encouraged to always compare any reports or statements provided by us or a co-adviser against the Account statements delivered from the qualified custodian. When you have questions about your Account statement, you should contact our firm and the qualified custodian preparing the statement.

Item 14 – Client Referrals and Other Compensation

The LifeWealth Group participates in referral arrangements with affiliated and unaffiliated third parties, which are made in accordance with applicable rules. Before we compensate an affiliated entity or third party for referrals, clear and prominent disclosures are provided on the material terms of the compensation arrangement between the referral source and our Firm, whether there is any affiliation between the referral source and our Firm, and whether the client bears any costs with respect to the referral. Additionally, we disclose that fees paid by a referred client may differ from fees paid by other similarly situated clients who are not introduced to The LifeWealth Group through a referral. When we make referrals to affiliated entities, the affiliated entity will separately contract with you for services provided by that entity. We strongly recommend prospective and current clients review all disclosures carefully to help address any potential conflicts of interest.

As disclosed under the "Fees and Compensation" section in this Brochure, our financial professionals providing investment advice on behalf of our firm are licensed insurance agents and registered representatives of a broker dealer and earn commission-based compensation for selling insurance or brokerage-based products. In addition, these persons may receive certain benefits from AEWM, including sales awards and trips, based on the volume of insurance business referred to Advisors Excel, an affiliate of AEWM. Our representatives who are licensed insurance agents also receive certain benefits from insurance carriers, including small gifts such as fruit baskets or snacks. These practices present conflicts of interest because our representatives who are licensed insurance agents have an incentive to recommend insurance products, as well as insurance products through specific carriers, to you based on

the receipt of these benefits. For information on how we address the conflicts associated with the sale of insurance products, please refer to the "Fees and Compensation" and "Other Financial Industry Activities and Affiliations" sections of this Brochure.

The Firm and its supervised persons receive certain benefits from third-party managers or vendors, including sales awards and trips, based in part on the amount of advisory business directed to the third-party manager. This presents a conflict of interest because we have an incentive to recommend the services of the third-party manager or vendor. We address this conflict by ensuring the recommendation is in your best interest.

Item 15 – Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access to or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

For all of our managed accounts, we have established procedures to ensure all client funds and securities are held by a qualified custodian in a separate account for each client under that client's name. Clients will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from The LifeWealth Group or AEWM. When clients have questions about their account statements, they should contact The LifeWealth Group or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

When providing asset management services, The LifeWealth Group maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. However, it is the policy of The LifeWealth Group to consult with you prior to making significant changes in the Account even when discretionary trading authority is granted.

If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your Account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment and the price at which the investment is bought or sold. If your Accounts are not managed on a discretionary basis, "Client Managed" you need to know that we will not trade in these account types. You will need to contact your Custodian or utilize your access to their platforms to enact trades. We maintain these accounts as administrative, reporting only, accounts.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to The LifeWealth Group so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Through the AEWM Program, you give The LifeWealth Group and AEWM discretionary authority to select Model Managers. You also grant the AEWM with the discretionary authority (without first consulting with client) to make all decisions to buy, sell or hold securities, cash or other investments for such portion of the account managed by the AEWM. You also grant AEWM the power and authority to carry out these decisions by giving instructions, on your behalf, to the qualified custodian(s) of the account.

Item 17 – Voting Client Securities

The LifeWealth Group does not vote proxies on behalf of Clients. We have determined that taking on the responsibility for voting client securities does not add enough value to the services provided to you to justify the additional compliance and regulatory costs associated with voting client securities. Therefore, it is your responsibility to vote all proxies for securities held in Account.

You will receive proxies directly from the qualified custodian or transfer agent; we will not provide you with the proxies. You are encouraged to read through the information provided with the proxy-voting documents and make a determination based on the information provided.

Item 18 – Financial Information

This *Item 18* is not applicable to this brochure. The LifeWealth Group does not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for the most recent fiscal year. We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients. Finally, The LifeWealth Group has not been the subject of a bankruptcy petition at any time.