

# Wealth Ease Wealth Management LLC Firm Brochure - Form ADV Part 2A

*This brochure provides information about the qualifications and business practices of Wealth Ease Wealth Management LLC. If you have any questions about the contents of this brochure, please contact us at 269-781-8371 or by email at: [austin@wealtheasewm.com](mailto:austin@wealtheasewm.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.*

*Additional information about Wealth Ease Wealth Management LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Wealth Ease Wealth Management LLC's CRD number is: 332595.*

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

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## Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Wealth Ease Wealth Management on 01/13/2026 are described below. Material changes relate to Wealth Ease Wealth Management's policies, practices or conflicts of interests.

- The firm has updated its email address. (Cover Page)
- The firm updated its Portfolio Management services and fees. (Items 4 and 5)
- The firm has successfully transitioned to formal registration with the Securities and Exchange Commission from its previous registration at the state level.
- The firm has updated its Possible Conflicts of Interests (Item 10.C)

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## Item 4: Advisory Business

### A. Description of the Advisory Firm

Wealth Ease Wealth Management LLC (hereinafter "WEWM") is a Limited Liability Company organized in the State of Wyoming. The firm was formed in July 2024, and the principal owner is Austin E. Rinard.

### B. Types of Advisory Services

#### *Portfolio Management Services*

WEWM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WEWM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

WEWM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. WEWM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

WEWM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of WEWM's economic, investment or other financial interests. To meet its fiduciary obligations, WEWM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, WEWM's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is WEWM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

WEWM coordinates with an unaffiliated accountant for tax return preparation. This service is offered to clients with \$250,000 in assets under management at no additional cost. WEWM compensates the accountant directly for these services.

Wealth Ease Wealth Management LLC (WEWM) offers portfolio management, pension consulting, and financial planning services tailored to clients' goals, objectives, and risk tolerance. The Wealth Ease Process: which integrates ongoing portfolio management with optional add-on services like estate planning and/or income tax planning. Clients may engage in just estate planning, just tax planning, or both. This program includes:

- Portfolio Management: Ongoing supervision and adjustment of client investments, as described above.
- Estate Planning Coordination: WEWM coordinates estate planning tailored to client needs. WEWM may recommend local full-service estate planning attorneys or other unaffiliated providers. WEWM may refer clients to Wealth.com, a third-party technology platform that guides clients through creating estate planning documents (e.g., wills, trusts). Clients complete this process independently on Wealth.com, with optional access to Wealth.com's network of trust and estate (T&E) attorneys for a separate fee. WEWM does not draft legal documents but may monitor progress (e.g., via read-only access to Wealth.com accounts) to ensure completion and identify optimization opportunities. A one-time coordination fee may apply (see Item 5).
- Income Tax Planning: WEWM coordinates with unaffiliated CPAs for tax planning and preparation, integrating these insights into clients' financial strategies. Clients opting into "The Wealth Ease Process" who receive one or both of these enhanced services, which may increase their AUM fees (see Item 5). Clients may decline the program and receive standard portfolio management alone. WEWM does not provide legal advice or tax preparation directly; clients are responsible for selecting and engaging third-party providers, though WEWM may recommend specific professionals or platforms (e.g., Wealth.com or local attorneys) based on expertise, cost, and suitability for the client's needs.

### *Pension Consulting Services*

WEWM offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- Identifying investment objectives and restrictions,
- Providing guidance on various asset classes and investment options,
- Recommending money managers to manage plan assets in ways designed to achieve objectives,
- Monitoring performance of money managers and investment options and making recommendations for changes,
- Recommending other service providers, such as custodians, administrators and broker-dealers, and
- Creating a written pension consulting plan.

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

### ***Self-Directed Brokerage Accounts***

If offered by the Plan, Participants will be able to open a self-directed brokerage account. Within this account Participants can expand their investment universe to more than just the funds offered by the Plan. In some instances, Participants may wish to hire WEWM to manage their investments within this self-directed brokerage account. WEWM would build a tailored portfolio for the Participant, typically by using individual securities. This additional service requires more time and resources from WEWM, and for that reason would come at an additional fee to the engaging Participant. This additional fee would be disclosed to the Participant prior to engaging with WEWM, and the Participant has the ability to avoid this fee by not engaging in the additional service. Each individual Participant would pay his or her own additional fee out of his or her own individual account balance. If a Participant engages in this additional service, it would not come at an additional cost to the Plan itself. Any additional cost would solely be charged to the engaging Participant. Some may view this as a conflict of interest as WEWM can earn additional revenue for this service.

### ***Financial Planning & Consulting Services***

Financial plans, financial planning, and consulting services may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

WEWM coordinates with an unaffiliated accountant for tax return preparation. This service is offered to clients with \$250,000 in assets under management at no additional cost. WEWM compensates the accountant directly for these services.

### ***Services Limited to Specific Types of Investments***

WEWM generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities and private placements, although WEWM primarily recommends equities. WEWM may use other securities as well to help diversify a portfolio when applicable.

### ***Written Acknowledgement of Fiduciary Status***

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

### **C. Client Tailored Services and Client Imposed Restrictions**

WEWM offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client Investment Policy Statement which outlines each client’s current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

### **D. Wrap Fee Programs**

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. WEWM does not participate in wrap fee programs.

### **E. Assets Under Management**

WEWM has the following assets under management:

<b>Discretionary Amounts:</b>	<b>Non-discretionary Amounts:</b>	<b>Date Calculated:</b>
\$114,778,221	\$17,373,000	December 2025

## **Item 5: Fees and Compensation**

### **A. Fee Schedule**

#### *Portfolio Management Fees*

WEWM charges an annual asset-based fee for portfolio management services, negotiable up to 2.00%, based on the average daily balance of the client’s account, billed quarterly in arrears. The specific fee rate (e.g., 1.00%, 1.25%, 1.50%) is agreed upon with each client

and memorialized in the Investment Advisory Contract. Minimum annual fee: \$500. The Wealth Ease Process Fees Clients opting into "The Wealth Ease Process" pay:

- **AUM Fee:** A higher, negotiable annual fee (e.g., 1.25% or 1.50%) for ongoing portfolio management, estate planning integration, and tax planning coordination. This fee is optional and may be declined without affecting standard portfolio management, which carries a lower rate (e.g., 1.00%). The exact rate is specified in the client's Investment Advisory Contract.
- **Estate Planning Coordination Fee:** A one-time fixed fee, negotiable based on client circumstances (e.g., \$2,000 as an example), billed in arrears upon completion of the estate plan via a separate Financial Planning Agreement. This fee covers WEWM's coordination with third-party providers (e.g., Wealth.com for simpler plans, local full-service estate planning attorneys for complex needs) and offsets costs paid to these providers. The fee varies to ensure fairness, reflecting the complexity and resources required for each client's estate plan.

Fees are negotiable and tailored to each client's situation. Clients receive 30 days' prior written notice of any AUM fee increase beyond the agreed rate, requiring an amended contract. Clients may terminate agreements within five business days of signing for a full refund, or thereafter with written notice, paying only for services rendered.

### *Pension Consulting Services Fees*

#### **Asset-Based Fees for Pension Consulting**

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
All Assets	Up to 1.00%

WEWM uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable, and the final fee schedule will be memorialized in the client's advisory agreement.

Clients may terminate the agreement without penalty for a full refund of WEWM's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement immediately upon written notice.

### *Financial Planning & Consulting Fees*

#### **Fixed Fees**

The negotiated fixed rate for creating client financial plans is between \$500 and \$15,000.

## **Hourly Fees**

The negotiated hourly fee for these services is \$250.

Clients may terminate the agreement without penalty, for full refund of WEWM's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

## **B. Payment of Fees**

### ***Payment of Portfolio Management Fees***

AUM fees are withdrawn directly from client accounts quarterly in arrears with written authorization, or invoiced to clients for payment by check or wire, at the client's election. Payment of The Wealth Ease Process Fees.

- The increased AUM fee for ongoing services is paid quarterly in arrears, as above.
- The estate planning coordination fee (e.g., \$2,000 as an example) is billed via check or wire in arrears upon completion of the estate plan by the third-party provider (e.g., Wealth.com or a local attorney), per the Financial Planning Agreement. The fee amount, if any, is agreed upon with the client based on their specific needs.

Clients may incur additional fees payable directly to third-party providers (e.g., Wealth.com's attorney network, local estate planning attorneys, CPAs), which are separate from WEWM's fees.

### ***Payment of Pension Consulting Fees***

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

### ***Payment of Financial Planning & Consulting Fees***

Financial planning fees are paid via check and wire.

Fixed financial planning fees are paid in arrears upon completion.

Hourly financial planning fees are paid in arrears upon completion.

### **C. Client Responsibility For Third Party Fees**

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

### **D. Prepayment of Fees**

WEWM collects its fees in arrears. It does not collect fees in advance.

### **E. Outside Compensation For the Sale of Securities to Clients**

Austin E. Rinard in his outside business activities (see Item 10 below) is licensed to accept compensation for the sale of investment products to WEWM clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, WEWM will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase WEWM-recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with WEWM.

Commissions are not WEWM's primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

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

## **Item 7: Types of Clients**

WEWM generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

There is no account minimum for any of WEWM's services.

## Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

### A. Methods of Analysis and Investment Strategies

#### *Methods of Analysis*

WEWM's methods of analysis include Charting analysis, Fundamental analysis and Technical analysis.

**Charting analysis** involves the use of patterns in performance charts. WEWM uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

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

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

#### *Investment Strategies*

WEWM uses long-term trading, short-term trading, short sales, margin transactions and options trading (including covered options, uncovered options, or spreading strategies).

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

### B. Material Risks Involved

#### *Methods of Analysis*

**Charting analysis** strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

**Fundamental analysis** concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in

stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

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

### *Investment Strategies*

WEWM's use of short sales, margin transactions and options trading generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

**Long-term trading** is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

**Margin transactions** use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

**Options transactions** involve a contract to purchase a security at a given price, not necessarily at market value, depending on the market. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options.

**Short sales** entail the possibility of infinite loss. An increase in the applicable securities' prices will result in a loss and, over time, the market has historically trended upward.

**Short-term trading** risks include liquidity, economic stability, and inflation, in addition to the long-term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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

### **C. Risks of Specific Securities Utilized**

WEWM's use of short sales, margin transactions and options trading generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss

using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as

applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF’s shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

**Real estate** funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

**Annuities** are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Private placements** carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

**Options** are contracts to purchase a security at a given price, risking that an option may expire out of the money resulting in minimal or no value. An uncovered option is a type

of options contract that is not backed by an offsetting position that would help mitigate risk. The risk for a “naked” or uncovered put is not unlimited, whereas the potential loss for an uncovered call option is limitless. Spread option positions entail buying and selling multiple options on the same underlying security, but with different strike prices or expiration dates, which helps limit the risk of other option trading strategies. Option transactions also involve risks including but not limited to economic risk, market risk, sector risk, idiosyncratic risk, political/regulatory risk, inflation (purchasing power) risk and interest rate risk.

**Non-U.S.** securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

## **Item 9: Disciplinary Information**

### **A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

### **B. Administrative Proceedings**

There are no administrative proceedings to report.

### **C. Self-Regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

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

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

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

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

Neither WEWM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

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

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

Austin E. Rinard is an investment adviser representative with another investment advisory firm. From time to time, he may offer clients advice or products from those activities and clients should be aware that these services may involve a conflict of interest. WEWM always acts in the best interest of the client and clients always have the right to decide whether or not to utilize the services of any WEWM representative in such individual's outside capacities.

Austin E. Rinard's outside activities are disclosed above. Additionally, for "The Wealth Ease Process," WEWM refers clients to Wealth.com, a third-party estate planning platform and/or local full-service estate planning attorneys and/or unaffiliated CPAs Depending on what WEWM deems to be the best fit for the client's needs. WEWM purchases an annual license to Wealth.com, allowing unlimited client referrals, and may receive read-only access to client accounts for monitoring. WEWM does not receive referral fees or compensation from Wealth.com, its attorney network, local attorneys, or CPAs unless disclosed. This creates a potential conflict, as WEWM may favor these providers due to familiarity, cost, or licensing arrangements. WEWM mitigates this by acting in clients' best

interests, recommending providers (Wealth.com or local attorneys) based on suitability, disclosing conflicts, and potentially allowing clients to choose their own professionals.

Todd Candelaria is an Investment Adviser Representative of WEWM, and owner of Todd D. Candelaria, CPA LLC. In his role as a CPA, Todd Candelaria will provide tax preparation services to WEWM clients. If utilized, Todd D. Candelaria, CPA LLC will provide WEWM with a discounted rate and WEWM will cover the cost for these services. This arrangement creates a conflict of interest, as WEWM has a financial incentive to recommend these accounting services based on the discounted pricing structure rather than solely on a client's individual needs. Clients are under no obligation to use these tax services and may choose any accounting professional they prefer. WEWM addresses this conflict by disclosing the relationship herein and maintaining the firm's fiduciary duty to always act in the best interest of the clients.

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

WEWM does not utilize nor select third-party investment advisers.

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

#### **A. Code of Ethics**

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

#### **B. Recommendations Involving Material Financial Interests**

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

#### **C. Investing Personal Money in the Same Securities as Clients**

From time to time, representatives of WEWM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of WEWM to buy or sell the same securities before or after recommending the same

securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. WEWM will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

From time to time, representatives of WEWM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WEWM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, WEWM will never engage in trading that operates to the client's disadvantage if representatives of WEWM buy or sell securities at or around the same time as clients.

### **Item 12: Brokerage Practices**

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

Custodians/broker-dealers will be recommended based on WEWM's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and WEWM may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in WEWM's research efforts. WEWM will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

WEWM will require clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc., TIAA-CREF Individual & Institutional Services, LLC, and Aspire PCS Retirement.

##### **1. *Research and Other Soft-Dollar Benefits***

While WEWM has no formal soft dollars program in which soft dollars are used to pay for third party services, WEWM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). WEWM may enter into soft dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client

will benefit from soft dollar research, whether or not the client's transactions paid for it, and WEWM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. WEWM benefits by not having to produce or pay for the research, products or services, and WEWM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that WEWM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

## **2. *Brokerage for Client Referrals***

WEWM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **3. *Clients Directing Which Broker/Dealer/Custodian to Use***

WEWM will require clients to use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer. By directing brokerage, WEWM may be unable to achieve most favorable execution of client transactions which could cost clients money in trade execution. Not all advisers require clients to use a particular broker-dealer.

## **B. Aggregating (Block) Trading for Multiple Client Accounts**

If WEWM buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, WEWM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. WEWM would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

## **Item 13: Review of Accounts**

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

All client accounts for WEWM's advisory services provided on an ongoing basis are reviewed at least Monthly by Austin E. Rinard, Managing Member and Chief Compliance Officer, with regard to clients' respective investment policies and risk tolerance levels. All accounts at WEWM are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Austin E. Rinard, Managing Member and Chief Compliance Officer. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

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

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

With respect to financial plans, WEWM's services will generally conclude upon delivery of the financial plan.

### **C. Content and Frequency of Regular Reports Provided to Clients**

Each client of WEWM's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

## **Item 14: Client Referrals and Other Compensation**

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

WEWM receives soft dollar benefits from Schwab, as described above. For "The Wealth Ease Process," WEWM refers clients to Wealth.com and/or local full-service estate planning attorneys or unaffiliated CPAs depending on what WEWM believes is the best fit to serve the client's needs. WEWM does not currently receive referral fees or economic benefits from these providers beyond the annual Wealth.com license fee paid by WEWM. Any future compensation will be disclosed in advance. Clients pay third-party fees (e.g., to Wealth.com's attorneys or local estate planning attorneys) directly if elected, separate from WEWM's fees.

Other than soft dollar benefits as described in Item 12 above, WEWM does not receive any economic benefit, directly or indirectly from any third-party for advice rendered to WEWM's clients.

With respect to Schwab, WEWM receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These

services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, 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. For WEWM client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to WEWM other products and services that benefit WEWM but may not benefit its clients' accounts. These benefits may include national, regional or WEWM specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of WEWM by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist WEWM in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of WEWM's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of WEWM's accounts. Schwab Advisor Services also makes available to WEWM other services intended to help WEWM manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to WEWM by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to WEWM. WEWM is independently owned and operated and not affiliated with Schwab.

## **B. Compensation to Non - Advisory Personnel for Client Referrals**

WEWM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

## **Item 15: Custody**

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

## **Item 16: Investment Discretion**

WEWM provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, WEWM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. Clients with discretionary accounts will execute a limited power of attorney to evidence discretionary authority. Clients cannot impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

## **Item 17: Voting Client Securities (Proxy Voting)**

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

## **Item 18: Financial Information**

### **A. Balance Sheet**

WEWM neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

Neither WEWM nor its management has any financial condition that is likely to reasonably impair WEWM's ability to meet contractual commitments to clients.

### **C. Bankruptcy Petitions in Previous Ten Years**

WEWM has not been the subject of a bankruptcy petition in the last ten years.