



RIGHTWAY INVESTMENTS, PLLC

FIRM BROCHURE

August 9, 2024

(Other Than Annual Amendment)

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This brochure provides information about the qualifications and business practices of RightWay Investments PLLC. If you have any questions about the contents of this brochure, please contact R. Jeff Green at (713) 304-6199 or j.green@rightwayinvest.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 agency.

RightWay Investments PLLC is a registered investment advisor. Registration of an Investment Advisor does not imply any level of skill or training. This brochure of the Advisor provides you with information about which you can determine to hire or retain an Advisor.

Additional information about RightWay Investments PLLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for RightWay Investments, PLLC is 168088.

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3. MATERIAL CHANGES AMENDMENT SINCE 3.25.2024

The Firm believes that strong relationships with our clients are founded on communication and transparency, and we constantly strive to provide our clients with complete and accurate information at all times. In that spirit, we are providing the following updates to this brochure (Please note: the next most recent Firm brochure is dated March 25, 2024):

Item 4B ii has been updated to reflect our partnership with Simplicity Wealth.

The Firm no longer has a co-advisor affiliation with Matson Money. (Items 4, 5, and 14)

The Firm has been updated Other Compensation to disclose soft money arrangements. (Item 14)

4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISOR HISTORY

R. Jeff Green is the owner of RightWay Investments, PLLC (the “Firm”). It was formed as a Texas professional limited liability company in July 2013. Additional information about Mr. Green is available under Item 19, below, and in his supplemental brochure (ADV Part 2B).

B. ADVISORY SERVICES OFFERED

Before the Firm enters into an Adviser-Client relationship, it may offer a complimentary general consultation to discuss services available, give a prospective client time to review services desired, and determine whether a relationship might benefit the client. Investment advisory services begin only after the Firm and client formalize the relationship with a properly executed agreement. The Firm offers the following services to its clients:

i. FINANCIAL PLANNING SERVICES

In the typical case, the Firm prepares an analysis of a client’s current investments, which is called a Portfolio MRI. The Portfolio MRI is a diagnostic measure of a client’s current investment information. The purpose of the personalized Portfolio MRI is to help a client understand how the various mixes of styles of investment portfolios may have performed in the past. There are three components of the Portfolio MRI; a discussion of the historical returns of basic asset categories as compared to inflation, an estimation of the client’s portfolio via broad-based asset category selection simulating the mix’s historical risk and reward characteristics, and finally, the Portfolio MRI allows the client to compare the risk versus reward characteristics of their portfolio against those of broadly diversified sample asset mixes weighted toward small-cap investing, international fixed income and equities, and high book-to-market value securities.

There are other services and software that the firm may recommend to clients and prospects.

ii. RECOMMENDATION OF THIRD-PARTY ADVISORS

After an initial meeting with the client or when deemed appropriate, the Firm may recommend the services of a third-party investment adviser (“Third Party Adviser”). The recommendation will depend on the client’s circumstances, goals and objectives, strategy desired, account size, risk tolerance, or other factors. The Firm works with each client to determine which Third-Party Adviser may be appropriate. Clients are never obligated to use a recommended Third Party.

The Firm will review Third Party Advisers prior to making a recommendation to the client. The Firm considers the following factors during its review: fees, reputation, performance, financial strength, management, price, reporting capabilities, client's financial situation, client's goals, client's needs, and client's investment objectives. After the Firm's review, it will present the client with one or more recommendations.

If the client wishes to proceed with the recommendation, the Firm will enter either a Co- Advisor relationship or solicitor arrangement with the recommended Third-Party Adviser. Under these arrangements, the Third-Party Adviser is responsible for portfolio management, best execution, portfolio reporting, trading, trade error resolution, and custodian reconciliations. The Firm will maintain its relationship with the client by monitoring the status of the client's accounts with the Third-Party Adviser, make recommendations about the Third-Party Adviser, usually meeting with the client either in person or by telephone on an annual basis annually and acting as the client's primary financial adviser. All questions regarding the Third-Party Adviser's services and performance will be directed to R. Jeff Green.

Because the compensation the Firm receives under these arrangements may differ depending on the agreement with each third-party adviser, it may have an incentive to recommend one Third Party Adviser over another if the compensation arrangements are more favorable. Also, because the Third-Party Adviser may pay the Firm a portion of their fee, the fee paid is negotiable, under most circumstances.

Clients who are referred to Third Party Advisers will receive full disclosure, including services rendered and fee schedules, at the time of the referral, by delivery of a copy of the relevant Third-Party Adviser's Form ADV Part 2A or equivalent disclosure document before receiving investment advisory services from the third-party adviser.

In addition, if the investment program recommended to a client is a wrap fee program the client will receive Appendix 1 or equivalent wrap fee brochure provided by the sponsor of the program. The Firm will provide each client with all appropriate disclosure statements, including disclosure of solicitation fees paid to the Firm and its advisory associates.

The Firm will not refer a client to a Third-Party Adviser unless it is registered or exempt from registration as an investment adviser in the client's state of residence.

Beginning April 1, 2024, RightWay Investments, PLLC, entered into a Co-Advisor agreement with Simplicity Wealth. Guided by the principles of education, value, and partnership, Simplicity Wealth (formed in 2019 as an operating company of Simplicity Group) is a comprehensive wealth management platform that specializes in providing independent financial advisors, and by extension their clients, with holistic financial planning solutions. Led by a team of credentialed professionals, Simplicity Wealth delivers institutional-level investing and sophisticated technologies to help investors minimize risk and maximize potential return of their household portfolio. Simplicity Wealth has available a host of Money Managers that can be used to give RightWay Investments and client, investment choices and market rationale for investment needs. When acting as a Co-Advisor Simplicity Wealth fee will be charged as laid out below under the Co-Advisor Relationship in Section 5 Part B.

iii. THIRD-PARTY PLATFORM

The Firm uses a third-party platform called “Pontera” to facilitate management of held away assets, such as defined contribution plan participant accounts, without discretion. Pontera’s platform allows the Firm to avoid being considered a custodian of Client funds since the Firm does not have direct access to client log-in credentials to affect trades. The Firm is not affiliated with Pontera in any way and receives no compensation from them for using Pontera’s platform. Clients are provided with a link which allows them to connect an account or accounts to the platform. Once a client’s account or accounts are connected to the platform, the Firm will review the current account allocations. To achieve a more diversified portfolio with potential higher returns and less risk, reallocation may be necessary. The Firm will recommend rebalancing the account or accounts, taking into consideration client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client accounts will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

C. TAILORED SERVICES

The Firm’s services are individualized to each client. Whether clients can place restrictions on the types of securities held in their accounts is determined by the recommended Third-Party Adviser.

D. CLIENT ASSETS MANAGED

The Firm manages client assets along with its Co-Advisor Simplicity Wealth. At no time does the Firm “RightWay Investments PLLC” have custody of any funds, unless processing a check to Third-Party via overnight mail generally within 24 hours.

As of December 31, 2023, the Firm had \$12,170,359 in non-discretionary assets under management.

5. FEES AND COMPENSATION

A. FINANCIAL PLANNING SERVICES FEE

The Firm may charge for the Portfolio Report. The fee is negotiable, and it is charged upon engagement.

The Firm may charge for a Financial Plan or Financial Policy Statement. The fee is negotiable, and it is charged upon engagement.

There are other services and software that the firm may recommend to clients and prospects at an additional, negotiable fee.

Financial Plan/Financial Policy Statement/Portfolio Report: The Adviser’s rate is \$500 to \$1,500 based on the complexity of the plan. All Fees will be agreed to prior to performing the analysis. The fees charged by the Adviser are solely for the preparation of the Financial Plan/Financial Policy Statement/Portfolio Report and do not include any fees that might be generated upon implementation of any recommendations.

Termination of Financial Planning Services

A client may terminate this service for any reason within the first five (5) business days after signing the contract without any cost or penalty for full refund. The contract may be terminated by giving written notice to the Firm at:

RightWay Investments, PLLC 7 Thorn Berry Place The Woodlands, Texas 77381. Upon receipt of written notice of termination, the client will receive a refund.

B. RECOMMENDATION AND MONITORING OF THIRD-PARTY ADVISORS

As stated in Item 4.B. ii. (See Above), the Firm will either be a Co-Adviser or solicitor of the recommended Third-Party Adviser.

RightWay Investments PLLC may choose to enter into agreements where the Firm will either be a Co-Adviser or solicitor of the recommended Third-Party Adviser. The fees associated with each service are as follows:

Co-Adviser Relationship

When the Firm is a Co-Adviser, it will charge a fee based upon an annual percentage of the assets under management as reported by the Third-Party Adviser. The annual fee is structured as:

AUM Fee	Rightway	Simplicity	Total
1M or less	0.99	0.5	1.49
1M - 2M	0.89	0.5	1.39
2M - 3M	0.79	0.5	1.29
3M-4M	0.69	0.5	1.19
4M-5M	0.59	0.5	1.09

The fee is negotiable based on the size of the account. The client will be asked to authorize the Third-Party Adviser to withdraw the Firm's fee. The fee is collected quarterly in advance. These are separate from the Third-Party Adviser's fees that are disclosed in the Third-Party Adviser's ADV Part 2A.

Third-Party Platform

When advising certain clients with held away assets, such as employee benefit plans pursuant to ERISA, the Firm will use Pontera's third-party platform. Pontera will directly charge the firm .30% AUM quarterly in advance. The Firm will pay this charge out of a client's preexisting advisory fee. For example, if a client's negotiated advisory fee is .99% annually, the client will be charged .99% by the Firm, and the Firm will submit .30% AUM to Pontera, retaining .69% for the Firm.

The asset-based advisory fee payable for any qualified Account will be either paid with a credit card or deducted directly from one of client's other non-qualified accounts. If there are insufficient funds available in another account or if the Firm believes that deducting the fee from another

Account would be prohibited by applicable law, the Firm will invoice you. Invoices must be paid within 30 days of receipt and will bear interest after it becomes due and payable and shall continue to accrue interest until payment is made at a rate equal to the lesser of (a) 2 two percent (2%) above the prime rate as reported by the Federal Reserve Bank of New York, located in New York City, New York, as of the date such payment was due and payable, or (b) the maximum rate permitted by applicable law. In the event you terminate the Firm's advisory agreement, all prepaid advisory fees will be returned to you on a pro rata basis determined by the number of days remaining in the quarter of termination.

Solicitor Relationship

When the Firm is a solicitor of the recommended Third-Party Adviser it does not charge a separate fee for the Recommendation and Monitoring of Third-Party Investment Adviser Services. Instead, the Firm will enter into an agreement with the selected Third-Party Adviser and share in a portion of the Third-Party Adviser's management fee that is charged to the client. The Firm's portion of the fee typically ranges from .50% to 1.25%. The exact fee is withdrawn and when it is withdrawn (quarterly or monthly, in advance or in arrears) will vary with each Third-Party Adviser. These details will be disclosed in the Third-Party Adviser's ADV Part 2A and the Third-Party Adviser's Solicitor Disclosure Document; both documents will be given to the client upon solicitation.

As established in Item 10.D – Other Industry Affiliations, by receiving a portion of the Third-party Adviser's management fee, this creates a conflict of interest for the Adviser. The sharing of the management fees creates a financial incentive to recommend Third Party Advisers that would pay the Firm a higher percentage of their fee. The Firm attempts to mitigate the conflict of interest to the best of its ability by placing the client's interest a head of its own, through its fiduciary duty, and by following the firm's Code of Ethics that establishes ideals for ethical conduct.

Other Fees

The Firm's fees are separate and distinct from any other fees or expenses. These fees and expenses may include brokerage commissions, transaction fees, and other related costs and expenses. Additionally, clients may incur certain charges imposed by custodians, brokers, third party investment, and other third parties such as fees charged by managers and custodians, or deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, as disclosed in a fund's prospectus, which is separate and distinct from the Firm's fee.

C. TERMINATION OF RECOMMENDATION AND MONITORING OF THIRD-PARTY ADVISER SERVICES

The termination of the Recommendation and Monitoring of Third-Party Adviser Services will be controlled by the terms and conditions of the Third-Party Adviser's ADV Part 2A. The client will need to review the Third-Party Adviser's ADV Part 2A – Item 5 – Fees and Compensation. The client may also contact the Third-Party Adviser directly at the address located on its Form ADV Part 2A, Third Party Adviser Agreement, or Solicitor Disclosure Document. The Third-Party Adviser Agreement also controls whether the client will receive a refund of any pre-paid fees.

6. PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

The Firm does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). Therefore, this section is not applicable.

7. TYPES OF CLIENTS

The Firm's advisory services are offered to individuals, high net worth individuals, corporations, or other business entities. The Firm does not require a minimum account size or a minimum net worth to open an account.

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

When we create a financial plan for a client, the Firm uses a dedicated planning process that puts the client first:

Step 1: Perform Qualitative and Quantitative Analysis of Financial Situation, including Risk Tolerance and Objectives.

Step 2: Perform a Comprehensive Portfolio Analysis.

Step 3: Design a Portfolio that Aligns with the Client's Stated Goals and Risk Tolerance.

Step 4: Review Proposal and Make Adjustments as Needed With respect to our Selection and Monitoring of Third-Party Advisers (described below), we will meet with each client to obtain the client's financial situation, goals, and risk tolerance. With this information, we will recommend a Third-Party Adviser that we believe meets the client's financial situation, goals, and risk tolerance. We will use various sources of information to help recommend a Third-Party Adviser for the client. These sources include but are not limited to Third-Party Adviser's ADV Part 2A, marketing materials, financial newspapers, and magazines, research prepared by other advisers, company press releases, prospectuses, and other SEC filings.

B. INVESTMENT RISKS

All investments bear different types and degrees of risk and **investing in securities involves a risk of loss that clients should be prepared to bear**. While the Firm recommends various Third- Party Advisers that are designed to provide appropriate investment diversification, some Third- Party Advisers take on significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies and Third-Party Advisers should seek to balance risks and rewards to achieve investment objectives. Clients need to ask questions about risks they do not understand. The Firm would be pleased to discuss them.

The Firm strives to render its best judgment on behalf of its clients. Still, it cannot assure or guarantee clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment advisor but is not a reliable predictor of future performance. The Firm continuously strives to provide outstanding long-term investment performance, but many economic and market variables beyond the Firm's control can affect the performance of an investment portfolio.

Additionally, the risks associated with asset allocation include the chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.

9. DISCIPLINARY INFORMATION

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Firm or the integrity of its management. The Firm has no information applicable to this Item because it has not been the subject of any administrative, arbitration, civil, criminal, or self-regulatory proceedings.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. BROKER-DEALER AFFILIATIONS

The Firm does not have any broker-dealer affiliations.

B. FUTURES/COMMODITIES FIRM AFFILIATION

The Firm is not affiliated with a futures or commodities broker.

C. OTHER INDUSTRY AFFILIATIONS

Mr. Green has been a professional licensed insurance agent since 1997 and sells life and annuity products. Mr. Green is appointed with various insurance companies. Mr. Green receives a commission for these services, which is separate from the fees outlined above. Also, it is the Firm's policy that recommended insurance products do not have to be purchased through Mr. Green.

D. SELECTION AND MONITORING OF THIRD-PARTY INVESTMENT ADVISERS

The Firm's services include the Recommending and Monitoring of Third-Party Advisers. A detailed description of this service can be found under Item 4.B – Advisory Services and Item 5.B – Fees and Compensation. The recommendation of Third-Party Advisers may create a financial incentive to recommend one Third Party Adviser over another. We attempt to mitigate the conflict of interest by recommending Third Party Advisers who match the client's financial needs, goals, and objectives. Also, clients are not obligated to use any recommended Third-Party Adviser.

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION

The Firm's Code of Ethics establishes ideals for ethical conduct based upon fundamental principles

of openness, integrity, honesty, and trust that all employees must follow. The Firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

The Firm's Code of Ethics covers all supervised persons, and it describes the Firm's high standard of business conduct, and fiduciary duty to clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumormongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

B. MATERIAL INTEREST IN SECURITIES

The Firm and Mr. Green do not have a material interest in any publicly traded securities.

C. INVESTING IN AND RECOMMENDING THE SAME SECURITIES

On occasion, the Firm's owner and investment adviser representatives may buy or sell for their own accounts securities that are the same as, similar to, or different than those that they recommend to their clients for purchase or sale. Differences can arise due to variations in personal goals, investment horizons, risk tolerance, and the timing of purchases and sales. The Firm attempts to mitigate the conflict of interest to the best of its ability through the enactment of the code of ethics, trading policies, and its fiduciary responsibilities. Nonetheless, the Firm generally attempts to place client transactions ahead of proprietary trades. The Firm's associates are aware of their fiduciary duty to clients and the prohibitions against the use of any insider information. Records of all associates' proprietary trading activities will be kept, available to regulators to review on the premises.

12. BROKERAGE PRACTICES

A. RECOMMENDATION CRITERIA

The Firm does not recommend broker-dealers or custodians. All brokerage and custodial services are handled by the Third-Party Advisers. Please see the Third-Party Adviser's ADV Part 2A (Item 12) for details.

B. TRADE AGGREGATION

The Firm does not trade client accounts. This section is not applicable.

13. REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

Mr. Green, the Firm's owner and Chief Compliance Officer, reviews the general holdings of a client's accounts on a quarterly basis. Mr. Green will review the client's risk tolerance no less than every three years.

B. OTHER REVIEWS

Additional reviews are conducted periodically depending on market conditions, economic or

political events, or by changes in a client's financial situation (such as retirement, termination of employment, physical move or inheritance).

C. REPORTS

Portfolio management clients receive quarterly statements from their custodian.

D. TRADE AGGREGATION

The Firm does not trade client accounts. This section is not applicable.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. OTHER COMPENSATION

The Firm may receive solicitors' (referral) fees based on a written agreement from unrelated investment adviser firms for referring clients for financial planning and/or investment advisory services. A disclosure letter will be provided to the client prior to or at the time of entering into any solicitation arrangement for financial planning and/or investment advisory services that identifies the solicitation fee. The solicitor's fee does not increase the fees paid by the client. Acting as a solicitor for another investment adviser may create a financial incentive to recommend one investment adviser over another. The Firm attempts to mitigate conflicts of interest by recommending investment advisers that match the client's financial needs, goals and objectives. Also, clients are not obligated to use any recommended third-party investment adviser.

B. CLIENT REFERRALS

The Firm does not pay for client referrals.

C. OTHER (SOFT MONEY)

RightWay Investments, PLLC can have agreements with certain mutual fund families, alternative investment sponsors, insurance companies, TAMPs, Strategists, and other counterparties (collectively, "sponsors") under which sponsors provide additional compensation or, better known as "marketing support." For example, Simplicity Wealth provided Website design and hosting.

The method, timing, rate, and amount of these marketing support payments vary by program and sponsor. All sponsors indirectly reimburse RightWay Investments, PLLC for specific expenses incurred in connection with educational events and seminars. These events provide valuable educational opportunities for our clients.

Advisors and clients also benefit from certain services provided by program sponsors and custodians. These services include:

- Performance reporting
- Statement creation and delivery
- Technology systems, including online access to account information
- Marketing material and other services related to the management of investment advisory accounts.

Additional information regarding RightWay Investments, PLLC marketing support arrangements can be available upon request.

In Summary: RightWay Investments PLLC is an independent Registered Investment Advisory firm. We also act as a Fiduciary for our clients. Any soft money received indirectly for market support has no influence on the design of investment strategies and solutions. RightWay Investments has access to multiple money managers with various models and has appointments with multiple insurance carriers. Planning and solutions are client specific and are customized to meet those specific needs.

15. CUSTODY

All client funds, securities, and accounts are held at third-party custodians. The Firm does not take possession of a client's securities. Clients should receive quarterly statements from the broker-dealer, bank, or other qualified custodians that hold and maintain the client's investment assets. The Firm urges clients to carefully review such statements.

Certain client accounts subject to the Firm's services may be held at a custodian that is not directly accessible by the Firm. The Firm may, but is not required to, manage these qualified accounts using Pontera's platform, which allows the Firm to view and manage these assets. For the Firm to manage these qualified accounts through Pontera, the client must agree to keep the Firm apprised of any changes to your username and password for qualified accounts so that the Firm can promptly update your credentials using the Pontera system. You must also agree to promptly address any requests to update your login credentials when requested by the Pontera system. In the event of any delay by you in updating your login credentials, you must acknowledge in your agreement that the Firm will not be responsible for any losses arising from your delays in updating your login credentials through the Pontera system. The Firm will be under no obligation to credit any fees for valuations made in good faith during periods when the Firm did not have access to any qualified accounts in calculating its fees under the investment advisory agreement.

16. INVESTMENT DISCRETION

All of our services are non-discretionary. However, Third Party Advisers may have investment discretion.

17. VOTING CLIENT SECURITIES

The Firm does not vote proxy solicitations for securities held in client accounts. All proxy solicitations are forwarded directly to the client by the account's custodian. A client may contact the Firm as questions arise.

18. FINANCIAL INFORMATION

A. BALANCE SHEET

The Firm does not require or solicit prepayment of more than \$500 in fees per client, six months

or more in advance. Therefore, it does not have to provide a balance sheet.

B. FINANCIAL CONDITION

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. The Firm has no financial commitment that impairs its ability to serve its clients.

C. BANKRUPTCY

The Firm has not been the subject of a bankruptcy proceeding.

19. REQUIREMENTS FOR STATE-REGISTERED ADVISORS

EXECUTIVE OFFICERS AND MANAGEMENT

R. Jeff Green – Owner

Education:

St. Cloud State University

Business Background:

RightWay Investments, PLLC – September 2013 to Present– Owner/CCO/Advisor

The Michels Law Firm– September 2018 to June 31, 2021– Financial Analyst

The Bond Law Firm – September 2008 to August 2018– Financial Analyst

Safe Asset Strategies, LLC – April 1997 to July 2022 – Owner and Annuity Specialist

Recio & Wyatt Law – July 2005 to September 200 – Financial Analyst

Rod Johnson Law Firm – May 2002-July 2005

GE Capital Assurance – 1997 to 1999 – Sales Manager

GE Capital Financial Services – 1985 to 1997 – Regional Manager

OTHER BUSINESS ACTIVITY

Please see Item 10.C and their ADV Part 2B Supplemental Brochures for details regarding Mr. Green's other business activities.

PERFORMANCE-BASED COMPENSATION

Mr. Green does not receive performance-based fees or any other compensation or incentives.

DISCIPLINARY HISTORY

Registered Investment Advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Please see Item 9. and their ADV Part 2B Supplemental Brochures for details regarding Mr. Green's disciplinary history.

ADDITIONAL RELATIONSHIPS WITH ISSUERS OF SECURITIES

Registered investment advisers are required to disclose all material facts regarding any relationship

with an issuer of securities. The Firm, Mr. Green, does not have a relationship with an issuer of securities. Therefore, no information is applicable to this Item