
Mission Statement

To deliver retail investors the risk-adjusted benefits we believe to be the result of employing a data-driven empirically disciplined institutional investment strategy for each stage of the investor lifecycle.

About Us

A Smarter Way to Invest, Inc. is an institutional asset management firm based in Brighton, Michigan. As a Registered Investment Advisory Firm, we provide asset management services to retail clients through participating Registered Investment Advisory firms and their advisors.

Our asset management style relies on adherence to a defined investment discipline within each model. We believe maintaining focus within each model we manage exclusively on the core objectives of each model enables the models to be readily combined to match diverse retail clients' investment needs. Our twelve models span three distinct families and are combined into fifteen distinct allocations with the ability to aggregate any number of custom strategies.



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Brochure Updated On
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This brochure provides information about the qualifications and business practices of A Smarter Way To Invest, Inc also referred to as "ASWTI" or "A Smarter Way To Invest". If you have any questions about the contents of this brochure, please contact us at 1-810-588-6178 or 1-844-893-6390 or ron@asmarterwaytoinvest.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. Using the term "Registered Investment Advisor" does not imply a certain level of skill or training.

Additional information about Caitlin John, LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 166170.

Item 2 - Material Changes

This Firm Brochure, dated June 27, 2017, is our disclosure document prepared according to the SEC's requirements and rules.

This Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

Consistent with the rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 - Advisory Business

A. Advisory Firm

A Smarter Way to Invest, Inc. (“ASWTI”), or (“Firm”) was approved as a Registered Investment Advisory firm on May 17, 2013.

With over 33 years of financial services experience, Ronald J. Briggs Jr. FIC, CRPC launched ASWTI to offer clients access to various proprietary asset allocation strategies and dynamic investment models (collectively, the “Proprietary Models”).

B. Advisory Services

ASWI offers asset management services to other registered investment advisory firms and hybrid registered investment advisor broker dealer firms (each, an “Introducing RIA”) and grants allocation strategies and investment models (collectively, the “Proprietary Models”) by utilizing either ASWTI’s Turnkey Asset Management Program (“TAMP”) or ASWTI’s Separately Managed Account (“SMA”) on either Folio Institutional or TD Ameritrade custodial platform. Both

investment structures adhere to the same set of ASWTI investment core philosophies and disciplines.

Institutional Distribution Services

ASWTI distributes investment management services of other third-party institutional investment managers to retail investment advisory firms alongside ASWTI's proprietary investment models. In consideration of ASWTI's distribution services, ASWTI receives compensation from each third-party institutional investment manager. The nature of ASWTI's payment for such services is described in Item 5 Fees and Compensation. ASWTI's compensation for distribution of third-party investment management represents a conflict of interest. To mitigate this conflict of interest, ASWTI ensures that no third-party institutional investment manager which ASWTI distributes has overlapping or significantly similar investment management strategies, which minimizes the risk of selecting a higher cost manager in lieu of a materially similar lower cost manager. Further, the end pricing to retail clients of third-party investment management is consistent with or lower than the fees normally charged should such services be accessed without ASWTI's distribution efforts. ASWTI's wholesalers, third-party institutional investment managers, and participating retail facing investment advisor firms are bound as fiduciaries and act only in accordance with this obligation to end-user retail clients.

C. Individual Services

Investment management of accounts using ASWTI's Proprietary Models are offered to clients through Introducing RIAs. In each case, the Introducing RIA will properly establish a relationship between ASWTI and each client according to the policies and procedures associated with either the TAMP or SMA structure between ASWTI and Introducing RIA.

In every case, the Introducing RIA has the sole direct contact with the Client. Once the Introducing RIA has determined an investment strategy that is appropriate for its Client, it may select among ASWTI's Proprietary Models for investment. The Introducing RIA advises its Client concerning the allocation of his or her portfolio among ASWTI's models, strategies and portfolios and whether and when to reallocate funds to different models. For example, the Introducing RIA could advise the Client to aggregate one or more pre-built strategies or to blend models to create a custom allocation. In each circumstance, no such advice is provided by ASWTI to the Introducing RIA's Client. All of ASWTI's communications are directed through the Introducing RIA and, unless specifically requested, ASWTI does not have direct communications with

the Introducing RIA's clients, other than through monthly newsletters.

An Introducing RIA's Clients may impose reasonable restrictions on the management of their Account, including the designation of specific securities or a specific category of securities, that should not be purchased for the Account or that should be sold if held in the Account, and may reasonably modify such restrictions from time to time. ASWTI reserves the right to decline to accept an account if it determines, in its sole discretion, that the restrictions imposed by Client(s) are not reasonable. The Client understands and acknowledges that any restrictions placed on the management of the Account imposed by the Client or particular requirements of the Account may cause Account performance to deviate from the performance of Client's chosen core portfolio. The Client acknowledges and agrees that where Client restricts a category of Securities that may be purchased for the Account due to social screening, ASWTI will determine in its sole discretion the specific Securities in that category.

Once engaged and after the necessary investment decisions concerning the allocation among the Proprietary Models have been made by the Introducing RIA and its Client, ASWTI then makes the decisions necessary to buy, sell, or hold investments within the specified Proprietary Models. The products utilized in effectuating these models include 1X's, 2X's, and 3X's exchange-traded funds, common stock, preferred stock, MLPs, BDCs, and REITs. All of the client's funds and securities will be held with either Folio Institutional (a division of FOLIOfn, Investments, Inc.) or TD Ameritrade Institutional (a division of TD Ameritrade, Inc.), independent third party Custodians unaffiliated with ASWTI.

In circumstances in which the Client gives the Introducing RIA investment discretion to select asset managers or the client provides ASWTI with investment discretion regarding the investment of his or her assets, ASWTI will have discretion to invest such Clients' assets in such investments and in such proportions, and to liquidate all or any portion of such investments, from time-to-time as ASWTI deems appropriate in order to comply with the Proprietary Model(s) selected by the Introducing Firm. Such discretion may specifically grant authority to reinvest dividends or authority to manage distributions for the client. Such discretionary authority, however, is otherwise limited to the purchases of securities within the managed models

ASWTI makes available through the Introducing RIA, for their Clients, the selection of non-discretionary trading or unlimited discretionary trading authority granted to supervise

investments and to purchase and sell certain securities. In all such purchases and sales, the Client(s) authorizes the Custodian to follow the instructions of ASWTI in every respect concerning the account. Except as otherwise provided, ASWTI is authorized to act for the Client in the same manner and with the same force and effects as the Client might or could do with respect to such purchases and sales and with respect to all other things necessary or incidental thereto, including effectuation of tenders, exchanges, redemptions, and similar actions with respect to the securities held in the client's account.

ASWTI will not be obligated to take action or offer any advice involving legal action on behalf of the Client with respect to securities or other investments held in the account(s), or the issuers thereof, which become the subject of legal notices or proceedings, including bankruptcies. ASWTI is not authorized to withdraw or transfer any money, securities or property out of the Client's account(s), whether in the name of the Client or otherwise, without the written permission of the Clients via email or the Clients signature on the Custodian's authorization for distribution form. ASWTI cannot and will not ever take custody of the Client's funds, securities, or accounts.

Investment accounts will be reviewed by ASWTI on a regular basis. Reviews may include the following: daily share or investment prices, determining how, or if, price change may affect Client asset allocation strategies, determining whether specific assets should be increased or sold, current risk tolerance, income needs, and other general financial conditions of the client which may influence investment selection. Further, to evaluate investments on behalf of the client ASWTI conducts various forms of investment analysis including the following: fundamental analysis, technical analysis, discounted cash-flow analysis, cyclical analysis, charting analysis, and social screening.

ASWTI's fundamental analysis involves the examination of financial statements, the general financial health of companies, analysis of management, and competitive advantages.

ASWTI's technical analysis involves the examination of past market data; primarily analysis of corresponding price and volume data sets.

ASWTI's discounted cash-flow analysis involves the examination of current and projected dividend cash flow relative to prevailing interest rates for the purpose of buying or selling of dividend yielding securities.

ASWTI's cyclical analysis involves the examination of the macro business cycle to determine favorable conditions for buying or selling of securities.

ASWTI's charting analysis involves the use of patterns for analyzing investment performance charts. ASWTI uses this technique to search for patterns to help determine favorable conditions for buying or selling securities.

ASWTI's social screening analysis involves evaluating investments based on social criteria such as sustainability and ethically sound business practices.

D. Investment Account Management

Any Introducing RIA wishing to engage ASWTI's portfolio management services in a TAMP or SMA capacity must enter into a formalized written advisory contract with ASWTI and follow the procedures, policies, and processes for correct and compliant client acquisition and ongoing servicing. Upon successful completion and establishment of such a relationship with introducing RIA, Introducing RIA will be granted access to the available ASWTI models and allocations in accordance with the structure established therein to use in servicing retail clients' financial needs.

Turnkey Asset Management Program

When using a TAMP, the duties of the introducing RIA will include assisting clients in choosing appropriate investment models and allocations, determination of financial objectives, definition of clients' risk tolerance, setting restrictions or limitations on the management of the account, explaining portfolio strategies and transactions, and answering or addressing client general questions, comments, and concerns.

When using the TAMP fee structure, the fee for asset management includes ASWTI's investment management services, its sub-advisors', solicitors' fees, and the custodial platform fees. ASWTI receives a portion of this fee as compensation for its advisory and affiliated services. ASWTI acts the sponsor and the investment adviser for the both ASWTI's proprietary models and affiliated Third-party sub-advisor models and allocations in the TAMP structure.

Separately Managed Account

ASWTI's Separately Managed Account ("SMA") platform provides access to ASWTI's Proprietary Models and affiliated Third-party sub-advisor models. The ASWTI SMA enables advisors to select ASWTI models or allocations as an investment vehicle for clients which match clients' financial needs and are managed by ASWTI on a discretionary basis primarily using, but not limited to, 1X's, 2X's, 3X's times leveraged and sector based exchange-traded funds (ETFs), common stock, preferred stock, MLPs, BDCs, and REITs.

When using ASWTI as an SMA, the duties of ASWTI will be

limited to providing investment management to clients of Introducing RIAs in accordance with the stated goals and objectives of each of the Proprietary Models. Clients through their advisors with Introducing RIAs are granted access to the ASWTI models and allocations and may choose to invest in them as an investment portfolio or as a component of an investment portfolio. Advisors with their clients shall determine the investment models or allocations to invest in, considering their applicability to clients’ financial objectives, economic condition, risk tolerance, investment values, and other pertinent factors regarding the investment selection process.

When using the SMA structure, ASWTI receives an investment management fee as a portion of assets under management as indicated in corresponding complete client agreements and documents. The SMA management fees charged by ASWTI are not inclusive of underlying ETF charges, fund fees, advisory fees, or custodial fees. The ASWTI investment management fee will be paid directly by the client’s chosen custodian or by the Introducing RIA from its fees per documentation formally establishing ASWTI’s investment management services with each client through the Introducing RIA. ASWTI acts as sponsor and investment adviser for the Models and Allocations offered in the SMA structure.

Wrap Fee Program

ASWTI does not sponsor a wrap fee program but supports a TAMP fee structure offered by soliciting firms.

E. Assets Under Management

As of June 2017, the total amount of assets under management within ASWTI’s proprietary investment management is \$0.00. All assets managed will be on a discretionary or non-discretionary basis. Currently, there is \$0.00 in discretionary assets under management and \$0.00 in non-discretionary assets under management.

Item 5 - Fees and Compensation

A&B. Advisory Services Compensation & Fee Deduction

For its portfolio management services, ASWTI is entitled to a fee of assets under management. ASWTI’s fee is calculated as a per annum fee described in the fee tables below. In either structure, Turnkey Asset Management Program (“TAMP”) or Separately Managed Account (“SMA”), fees shall be billed in advance for the quarter based on the prior quarter’s ending by direct payment from the Custodian of the Client’s Investment Account in accordance with the completed forms formalizing

the relationship between each Client and ASWTI. Such billing shall occur within 15 days after the quarter ends.

ASWTI doesn’t offer insurance products to their clients.

Turnkey Asset Management Program [TAMP]

For Clients participating in the TAMP fees shall be as follows in Table 1: TAMP Asset Management Fees.

Table 1: TAMP Asset Management Fees

Managed Assets	Percentage of Assets
Assets under \$250,000.99	2.48%
Assets between \$250,001 - \$500,000.99	2.38%
Assets between \$500,001 - \$750,000.99	2.28%
Assets between \$750,001 - \$1,000,000.99	2.18%
Assets between \$1,000,001 - \$1,500,000.99	2.08%
Assets between \$1,500,001 - \$2,000,000.99	1.98%
Assets between \$2,000,001 - \$3,000,000.99	1.88%
Assets between \$3,000,001 and above	1.78%

In accordance with the structure of the TAMP, ASWTI shall pay a portion of TAMP fees to the Introducing RIA. Such fee sharing is disclosed to the Client in the forms formalizing the relationship between the Client and ASWTI. The TAMP fee structure is inclusive of asset based Custodial fees but does not include ETF fees, miscellaneous custodial service fees or other Fund fees incurred from underlying holdings. ASWTI receives no compensation, nor do participating solicitors, for such fees paid by clients of ASWTI.

The Management Fees will be calculated for the TAMP as follows:

Total amount of assets per client account at the end of a calendar quarter x annual percentage of assets charged to client ÷ 4 quarters = quarterly amount deducted from clients account.

TAMP structure:

For example, assume the ending total amount of a client’s account in a calendar quarter was \$100,000 which puts the client in the 2.48% managed asset range. In that case, the amount of the deducted quarterly client fee would be \$620.00. $(\$100,000 \times 2.48\%) \div 4 \text{ quarters} = \620.00 .

Separately Managed Accounts

For Clients participating in the SMA fees shall be as follows:

Table 2: SMA Asset Management Fees

Managed Assets	Percentage of Assets
Less than \$25,000,000	0.72%
\$25,000,001 - \$50,000,000	0.65%
\$50,000,001 - \$100,000,000	0.60%
\$100,000,001 - \$150,000,000	0.57%
\$150,000,001 and greater	0.55%

In accordance with the structure of the SMA between ASWTI and Introducing RIA, the fees for the SMA will either be paid by the Introducing RIA on behalf of their Client or be paid directly by the Client’s chosen custodian for assets under management. Responsibility for such payment shall be determined by the completed forms formalizing the relationship between each Client and ASWTI. It is the sole and complete authority of ASWTI to determine the appropriateness and applicability of negotiating the SMA fee structure listed above. The SMA management fees charged by ASWTI are not inclusive of underlying ETF charges, fund fees, advisory fees, or custodial fees.

The Management Fees will be calculated for the SMA as follows:

Total amount of assets per client account at end of calendar quarter x annual percentage of assets charged to client ÷ 4 quarters = quarterly amount deducted from clients account.

SMA structure:

For example, assume the ending total amount of a client’s account in a calendar quarter was \$100,000 and the client is paying ASWTI directly the 0.72% management fee. In this case, the amount of the deducted quarterly client fee would be \$180.00. $(\$100,000 * 0.72\%) \div 4 \text{ quarters} = \180.00 .

Self-Regulating Organization (“SRO”), SRO & SEC Fees are listed on the Folio Institutional statement of invoice. These fees are paid by all ASWTI Client(s), but are only listed distinctly on the Folio Institutional platform. The entire nominal fee is paid to the relevant SRO & SEC organization; none of these fees are paid to ASWTI or the Custodian. Self-Regulatory Organization (“SRO”) is a non-governmental organization that has the power to create and enforce industry regulations and standards. The priority is to protect investors through the establishment of rules that promote ethics and equality.

Comparable services may be available in the broader marketplace, and lower fees for comparable services may be available from other sources.

Any charges of underlying holdings, such as those for ETFs or for Advisory fees, may be found in the corresponding prospectus or ADV made available to each client. These fees would be in addition to and separate from the ASWTI Management Fees described herein.

AWSTI is made available on two custodians: Folio Institutional and TD Ameritrade (“TDA”). The client will establish a discretionary trading AWSTI account at a custodian. Client(s) assets will be held in his or her name by the custodian of the account. In each case, the client appoints the custodian as his or her agent for purposes of calculating and paying the AWSTI Management Fee. This form of fee based billing may be interpreted as indirect custody of client accounts. AWSTI and its advisors shall never take custody of clients’ accounts or assets therein. Further, any and all fee based billing shall be in accordance with the fee schedules agreed upon by each client in the Solicitor’s Disclosure Statement or the ASWTI Solicitor Client TAMP Agreement.

For clients using Folio Institutional for Custody, fee billing is done as follows: acting as the Client’s agent, the Custodian calculates the amount of the quarterly ASWTI Management Fee incurred without any invoice or other billing provided to the Custodian by ASWTI. For clients using TD Ameritrade for Custody, fee billing is done as follows: acting as the Client’s agent, ASWTI calculates the amount of the quarterly ASWTI management fee incurred and provides this by invoice to TD Ameritrade. If the Client does not submit a written objection to the Custodian, or to ASWTI who will notify the Custodian, in accordance with the terms of the custodial account agreement the Custodian will promptly deduct the amount so calculated from the Client’s custodial account and pay it directly to ASWTI.

Folio Institutional will directly debit fees from Client’s account(s) with authorization signatures which grants Folio Institutional authorization to do so. No less than five (5) business days prior to the date of the date on which it withdraws the fee amount from the custodial account, Folio Institutional will notify the Client in writing by electronic mail of the manner in which the ASWTI Management Fee was calculated and the total amount to be withdrawn. If the Client does not object in writing within that five (5) business day period, Folio Institutional will pay the ASWTI Management Fee directly to AWSTI. Please note if the Client does not wish to receive correspondence via email and requests all

correspondence via First Class mail service, the Client will incur a \$150.00 annual fee by Folio Institutional.

TD Ameritrade will directly debit the AWSTI Management Fee from the Client's custodial account. TD Ameritrade will give the Client on-line access to account information through which, at any time within five (5) business days after the end of each calendar quarter, the Client can view the amount of the AWSTI Management Fee and the manner in which it is calculated. The Client must notify TD Ameritrade of any objection within such five (5) business day period.

The advisory contract between ASWTI and the client may be modified upon such terms as may be mutually agreed upon in writing. The advisory contract may be terminated by either party, whether with or without cause, at any time by giving the other party written notice of termination no less than thirty (30) days prior to the date of termination. ASWTI will notify the applicable custodian about the termination. If the selected custodian is Folio Institutional, the client will be responsible for a \$100.00 account closing fee.

Once an Introducing RIA's Client account has been closed, the Introducing RIA shall be responsible for unsubscribing from ASWTI's Proprietary Models and causing any necessary liquidation of securities managed under such models. The Introducing RIA's Client has ten (10) business days to contact the Introducing RIA, including the time for the Introducing RIA to contact ASWTI to procure a pro rata fee refund. Once a refund has been approved, ASWTI will refund to the applicable Custodian (for deposit into the Client's custodial account) a pro rata portion of the fees paid to ASWTI for the calendar quarter in which such termination occurs.

The refund amount will be calculated as follows:

Fees paid to ASWTI during the calendar quarter ÷ 90 days x number of days remaining until the end of calendar quarter = amount to be refunded.

For example, assume the amount paid to ASWTI in a calendar quarter was \$2,500 and the Agreement is terminated with 45 days remaining in the quarter. In that case, the amount of the refund would be \$1,250 ($\$2,500 \div 90 \text{ days} = \$27.78 \text{ per day} \times 45 \text{ days} = \$1,250$).

The Client may incur additional fees payable to others as a result of any such termination, such as, for example, account closing fees, liquidation fees and other fees or charges which may be described in either the investment advisory contract

between the Introducing RIA and the Client or the custodial agreement with the Custodian.

Each IRA account on the Folio Institutional platform will be charged a separate IRA custodial fee of \$25 per year by Kingdom Trust. A separate step out trading fee of \$3.95 will be assessed on all purchases and sales of individual securities held or transferred on the platform as a non-Folio holding, referring to transactions occurring outside of the proprietary investment models. ASWTI is not compensated in any way by either one of these non-inclusive fees. ASWTI will not charge any account opening fee or set up fee. There are no IRA account opening fees, annual fees, or separate trading fees at TD Ameritrade.

Note: For Clients, whose custodial account is held by Folio Institutional, the fee calculation can also be found at www.folioClient.com by logging into the Client(s) account, clicking on "Statements & Tax Records," then "Billing Notices," and finally, choosing which month and year. Folio Institutional provides the Client, no less than quarterly, a statement indicating all amounts disbursed from the account, including, separately, the amount of the advisory fees paid that include those of the TPA and Custodial fees.

For Clients, whose custodial account is held by TD Ameritrade, the fee calculation can be found at www.advisorclient.com by clicking on the "My Account" tab. This end of quarter balance multiplied by the percentage the Client(s) initialed on page 4 of the Investment Advisory Agreement is divided by four to determine the Client(s) quarterly fee amount. There will be a charge to the Client(s) account of \$100.00 per account for all full account transfers to another firm. This reflects the increased costs to meet IRS cost basis transfer requirements. ASWTI is in no way compensated on these transaction fees.

Clients may view their TD Ameritrade Investing Accounts online to see current account information. Such information includes performance of the previous business day (including certain benchmark data) and asset allocation information as of the current business day. TD Ameritrade will also provide a written account statement (at least quarterly) detailing the positions and activity in a client's TD Ameritrade Investing Account, and clients will receive trade confirmations for each buy, sell, or exchange transaction in their accounts. The account statements from TD Ameritrade will indicate the amount of ASWTI's advisory fees deducted from a client's account(s) each billing period. If the Client(s) disagrees with the assessed fees debited, a written request must be submitted to ASWTI of the objection.

Institutional Distribution Compensation

ASWTI's compensation for institutional distribution services varies on a per relationship basis. ASWTI's compensation is a percentage of the fees earned by Third-Party Institutional Investment Managers which ASWTI distributes on a per relationship basis. The end unit pricing of the distributed investment management services, or the amount paid by retail clients for such services, are consistent with or lower than the fees which would be paid for the same services without ASWTI's distribution efforts.

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

The fees charged are calculated as described in Item 5 and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory Client (known as a performance based fee).

ASWTI does not accept or charge performance based or side by side management fees at this time.

Item 7 - Types of Clients

ASWTI's clients are clients of other (RIA) Registered Investment Advisory firms. Such Clients include individuals, families, businesses, trusts, and estates. There is a \$25,000.00 minimum account size.

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

ASWTI currently manages various models and allocations allowing for client diversification over various asset classes and risk tolerances.

A. Methods of Analysis / Investment Strategies

Investing in securities involves risk of loss which our Clients should be prepared to bear. No amount of analysis or diversification can wholly account for or eliminate market volatility and systematic risk. Investment accounts will be subject to methods of analysis by the Third-Party Portfolio Manager, Advisor and the Firm as described herein.

ASWTI and its Advisors methods of analysis for the selection of Third-Party Portfolio Managers include at least the following criteria: income, risk tolerance, sector, market capitalization, long term needs and objectives.

Investment Strategy:

We analyze the type of investment strategy each Third-Party Portfolio Manager provides, if that strategy is an effective

vehicle to achieve particular investment objectives, if the strategy is within the broad risk tolerances of our clients, and does this strategy correlate closely with the strategies already employed by ASWTI Advisors working with other Third-Party Portfolio Manager advisors.

Performance History:

ASWTI evaluates the relative and absolute performance history of each prospective Third-Party Portfolio Manager to examine performance during various market conditions. ASWTI will only work with Third-Party Portfolio Managers that have at least 3 years of portfolio management experience.

Investment Cost:

ASWTI examines the cost of underlying holdings, where applicable, in order to determine if a given Third-Party Portfolio Manager has any conflicts of interest or if a Third-Party Portfolio Manager has an excessively expensive strategy. Because our managed fees are wrapped, ASWTI looks to minimize any expense which cannot be reimbursed such as ETF and mutual fund expenses. Third-Party Portfolio Managers using 1X's, 2X's, 3X's times leveraged and sector based exchange-traded funds (ETFs) will be evaluated to ensure they are seeking to minimize excessive costs or have the reasonable expectation of delivering alpha over time to offset such costs.

Total Assets Under Management:

ASWTI will evaluate the level of assets managed by each Third-Party Portfolio Manager and within each strategy offered by each Third-Party portfolio manager. This is to determine the long term viability and limitations of each strategy which may arise from either insufficient capital or excess capital being associated with each strategy.

MAR Ratio:

ASWTI may examine each Third-Party Portfolio Manager's MAR ratio to determine the relative value of annual performance realized against the largest drawdown each strategy has had over a specific period of time.

Third-Party Portfolio Manager Review:

Third- Party Portfolio managers providing sub-advisory services to ASWTI clients are reviewed at least annually in accordance with the criteria described above in order to determine their ongoing utility to ASWTI Advisors and Clients. In particular, ASWTI will emphasize in its review the criteria relating to underlying expenses, relative performance, limitations of strategies, and correlations to other Third-Party Portfolio Managers. ASWTI will continually seek to provide its clients with a suite of tactically and sector diverse Third-Party

portfolio managers.

Each Third-Party Portfolio Manager employs their own methods of analysis in providing sub advisory services; each Third-Party Portfolio Manager's specific methods of analysis may be found in their Form ADV 2 Brochure or Prospectus which is made available to our clients via our website www.asarterwaytoinvest.com or in a paper version if requested.

B. Strategies/Risk

ASWTI's Clients may participate in a variety of strategies which generally fall into either of the following two categories: active and passive investment management.

a) Active Investment Management

Active asset management entails continuous evaluation and investment selection in accordance with the goals and objectives of each Client. ASWTI Clients have two options to participate in active investment management, Advisor Managed Portfolios or Third-Party managed accounts within the ASWTI Wrap-Fee program. For detailed information on active investment management with ASWTI see Item 4 Advisory Business – Investment Management above.

b) Passive Investment Management

Passive asset management entails selecting investments based on appropriateness with regards to each Client's risk tolerance, goals, and objectives.

Once investments are chosen, they are held for the long-term and replaced only as appropriate with regards to changing market conditions and each Client's risk tolerance, goals, and objectives. For detailed information on passive investment management with ASWTI see Item 4 Advisory Business – Investment Management above.

Investment Risk

An investor should consider the investment objective, risks, charges, and expenses carefully before investing. Investing, including into the strategies and analyses detailed above, involves exposure to risks. These include the following:

- Interest Rate Risk
- Geopolitical Risk
- Political Risk
- Default Risk
- Regulatory Risk
- Civil or Criminal Action Risk
- Liquidity Risk
- Manager Error

- Business Cycle Risk
- Macroeconomic Risk
- Systematic Risk
- Risk of Loss of Principal
- Other Nonsystematic Risks

Historical, non-back-tested performance data represents past performance from actual accounts selected on the basis of position size and longest holding period. Past performance is not a guarantee, or an implied guarantee, of future results. Current performance may vary from the performance quoted. Investment returns and principal value will fluctuate. There is no guarantee that any investment model will achieve its stated investment objectives. An investment is subject to the risks listed above, including the possible loss of the principal amount invested. Investments are not FDIC insured, may lose value, and have no bank guarantees.

C. Material Risk

ASWTI does not primarily recommend a particular type of security that involves significant or unusual risks.

Item 9 - Disciplinary Information

No disciplinary criminal or civil action has been taken against ASWTI or any owner, partner or employee. ASWTI does due diligence by conducting a background check on all associated owners, partners or employees.

Each individual licensed advisor is responsible for accurately and truthfully completing a U4 and disclosing any and all disciplinary or legal actions taken against them.

Item 10 - Other Financial Industry Activities and Affiliations

ASWTI will receive referrals from Introducing RIAs on the TAMP platform and will share resultant TAMP fees with such Introducing RIAs.

ASWTI will manage assets for Introducing RIA's Clients on the SMA platform and will be compensated by either the Client's chosen custodian of the Introducing RIA or Introducing RIA.

SimplyRIA, Inc. introduces Introducing RIAs to ASWTI for no compensation, direct or indirect.

ASWTI does not have anyone registered or pending to register as a broker-dealer or a registered representative of a broker-dealer.

ASWTI does not have anyone registered or pending to register as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Ronald J. Briggs, Jr. is the founder, Chief Executive Officer, Chief Compliance Officer, and Chief Investment Strategist.

Ronald J. Briggs Jr. is CIO, CCO and Co-Founder of Guardian Pointe Private Wealth Management, LLC ("GP") which is not affiliated to ASWTI. GP is a SEC Registered Investment Advisor Firm.

Ronald J. Briggs Jr. is the Principal, Chief Investment Strategist and Investment Advisor Representative for Caitlin John, LLC a Registered Investment Advisory Firm. He offers financial planning and advises his own individual Clients as an Investment Advisor Representative. Caitlin John, LLC will be an Introducing RIA utilizing ASWTI as a model manager for its Client's investments. Therefore, Ronald J. Briggs Jr. will act as a Solicitor for ASWTI and a fiduciary to his Client's in allocating funds as per their Investment Policy Statement.

Institutional Distribution Services: ASWTI receives economic benefits in the form of fee-based compensation for distribution of third-party institutional investment management services to third-party retail facing advisory firms. In doing such activity, ASWTI creates a conflict of interest which is mitigated as follows. First, ASWTI ensures that there is no overlap or significant similarity between the strategies ASWTI maintains itself or distributes for third party institutional investment managers. Doing so minimizes the ability for preferential treatment of higher cost like-services. Further, ASWTI's successful distribution to third-party retail facing advisory firms does not increase, and may decrease, the end pricing to retail clients compared to such services being established without ASWTI's distribution efforts. ASWTI and its employees shall always act in a manner which is consistent with the fiduciary obligation owed to retail clients. ASWTI further emphasizes this obligation between third-party retail advisory firms and their clients. ASWTI believes that extending its distribution capabilities to vetted third-party institutional investment managers is an extension of its fiduciary obligation, because ASWTI is broadening the suite of investment management services third-party retail advisors may use when pursuing their clients' best interests.

Prior to introducing any Pennsylvania clients to another investment advisor, ASWTI will be responsible for determining that the Investment Advisors are properly licensed, notice filed or exempt from registration with the

appropriate department.

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

Employees and Investment Advisory Representatives shall conduct themselves in a manner consistent with the highest ethical and fiduciary standards. They shall avoid any action, whether for personal profit or otherwise, that results in a conflict of interest with ASWTI or its Client accounts, or which may be otherwise detrimental to the interests of Clients of ASWTI. They will not attempt to improperly use influence for their personal benefit.

Investment Advisory Representatives taking any investment actions, shall exercise diligence and thoroughness, and shall have a reasonable basis for any such action. Advisor will disclose personal trading and discuss if any conflicts are present, such as investments in same securities that are also being held by their Clients. These would be disclosed on their Annual Certification of Compliance with the companies' personal Securities Transactions Disclosure and Code of Ethics form. They will also be subject to existing supervisory procedures of ASWTI. A copy of the Code of Ethics will be provided to a Client or a prospective Client upon request.

ASWTI and its employees and Advisory Representatives, shall not disclose any non-public information relating to a Client account's portfolio or transactions of ASWTI. Nor shall any employee or Advisory Representative disclose any non-public information relating to the business or operations of ASWTI unless properly authorized to do so.

At no time, will ASWTI or any associated person of ASWTI, transact in any security to the detriment of any Client. In every situation, Client's needs are considered first.

Item 12 - Brokerage Practices

1. Soft Dollar Benefits

ASWTI does receive research as a soft dollar benefit for Client assets under management with TD Ameritrade. Because ASWTI receives such soft dollars, ASWTI may have an incentive to select or recommend a particular broker dealer based on interest in receiving such research. ASWTI does not receive Client brokerage commissions. ASWTI manages this conflict of interest by offering each institutional relationship for asset management the choice of which custodian to access for ASWTI asset management services.

2. **Brokerage for Client Referrals**

ASWTI recommends using its Custodians, Folio Institutional and TD Ameritrade Institutional which are considered as Broker Dealers.

3. **Directed Brokerage**

TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”) member FINRA/SIPC/NFA. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker/dealer. TD Ameritrade offers to independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program.

ASWTI participates in TD Ameritrade’s institutional customer program and recommends TD Ameritrade to Clients for custody and brokerage services. TD Ameritrade may also have paid for business consulting and professional services received by ASWTI’s related persons. Some of the products and services made available by TD Ameritrade through the program may benefit ASWTI but may not benefit its Client accounts. These products or services may assist ASWTI in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help ASWTI manage and further develop its business enterprise. The benefits received by ASWTI or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, ASWTI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by ASWTI or its related persons in and of itself creates a potential conflict of interest and may indirectly influence ASWTI’s choice of TD Ameritrade for custody and brokerage services.

4. **Aggregate of Client Trades**

ASWTI intends to aggregate Client orders whenever possible, using omnibus trading (block trades) for all purchase and sales inside of each model. Folio Institutional and TD Ameritrade allow for the aggregation of such orders, and ASWTI intends to take advantage of such aggregation to obtain competitive pricing on all transactions.

Trading costs through Folio Institutional and TD Ameritrade are as described in “**Item 5 – Fees and Compensation**”

In certain circumstances ASWTI may, to best serve Clients, place non-aggregate individual trading orders. Non-Aggregated orders may be placed on an individual Client basis

in order to meet Client needs including but not limited to distributions, unusual/extraordinary circumstances, or at the request from a Client. Clients may incur additional costs by not aggregating their trade orders.

Item 13 - Review of Accounts

Models and allocations managed by ASWTI will be reviewed by Ronald J. Brigg, Jr and/or the Portfolio Management team of ASWTI on no less than a monthly basis. Reviews may include the following: daily share or investment prices, determining how, or if, price change may affect Client asset allocation strategies, determining whether specific assets should be increased or sold.

The Client can go online at any time to www.advisorclient.com or www.folioClient.com to review securities held and managed by ASWTI. This provides the means for 100% transparency of all daily trades, transactions and valuations.

Item 14 - Client Referrals and Other Compensation

ASWTI does not receive compensation from any person for Client referrals.

TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”) member FINRA/SIPC/NFA. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker/dealer. TD Ameritrade offers to independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program.

ASWTI participates in TD Ameritrade’s institutional customer program and recommends TD Ameritrade to Clients for custody and brokerage services. TD Ameritrade may also have paid for business consulting and professional services received by ASWTI’s related persons. Some of the products and services made available by TD Ameritrade through the program may benefit ASWTI but may not benefit its Client accounts. These products or services may assist ASWTI in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help ASWTI manage and further develop its business enterprise. The benefits received by ASWTI or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade.

As part of its fiduciary duties to clients, ASWTI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by ASWTI or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the ASWTI's choice of TD Ameritrade for custody and brokerage services.

ASWTI's compensation for institutional distribution services varies on a per relationship basis. ASWTI's compensation is a percentage of the fees earned by Third-Party Institutional Investment Managers which ASWTI distributes on a per relationship basis. The end unit pricing of the distributed investment management services, or the amount paid by retail clients for such services, are consistent with or lower than the fees which would be paid for the same services without ASWTI's distribution efforts.

Item 15 - Custody

Account assets will be held by either Folio Institutional or TD Ameritrade. ASWTI will not have custody of any assets in the Clients account, but a form of indirect or limited form of custody. Only the Custodian has the authority to deduct management fees authorized by the Client.

ASWTI has the authority to instruct the Custodian, on the behalf of the Client, to purchase, sell, short, hedge, margin, redeem or exchange from any securities to other securities within the chosen Custodian for the Clients account.

Item 16 - Investment Discretion

ASWTI is to be granted unlimited discretionary trading authority to supervise all investments managed by ASWTI, as well as affiliate Third-Party Sub-Advisors.

Discretionary authority is limited to the purchases and sales of 1X's, 2X's, 3X's times leveraged and sector based exchange-traded funds (ETFs), common stock, preferred stock, MLPs, BDCs, and REITs for and on behalf of the Client. The Client also authorizes ASWTI to reinvest dividends and other distributions from securities held in the portfolio. In all such purchases and sales, the Custodian is authorized to follow the instruction of ASWTI in every aspect concerning the account. Except as herein otherwise provided, ASWTI is authorized to act for the Client in the same manner and with the same force and effects as the Client might or could do with respect to such purchases and sales, and all other things necessary or incidental thereto, including exchanges or redemptions, or other similar actions with respect to the securities held in the account.

ASWTI will not be obligated to take action or offer any advice involving legal action on behalf of the Client with respect to securities or other investments held in the account(s), or the issuers thereof, which become the subject of legal notices or proceedings, including bankruptcies. ASWTI is not authorized to withdraw or transfer any money, securities, or property out of the Client account(s), either in the name of the Client or otherwise, without the written permission of the Client which may done via email or USPS. All email/mail requests are verified via follow up phone call, and requires the Client's signature on the Custodian's authorization for distribution form. ASWTI nor any of its personnel cannot and will not ever take custody of any of the Client's funds or securities except for the deduction of authorized management fees.

Item 17 - Voting Client Securities

ASWTI does not accept authority, take any action or render any advice with respect to voting client proxies.

Item 18 - Financial Information

ASWTI does not require or solicit more than \$500.00 in fees per Client paid more than six (6) months in advance.

No financial condition exists that would impair our ability to meet our contractual commitments to our Clients.

ASWTI has not been subject to a bankruptcy petition at any time during the last 10 years.

The balance sheet of ASWTI is prepared in accordance with generally accepted accounting principles, audited by an independent accountant.