

**Wealth & Wellness Group**  
**Form ADV Part 2A**

690 Hope St, Suite B.  
Brighton, MI 48116  
888-267-1138

Email: [bob.laura@wealthandwellnessgroup.com](mailto:bob.laura@wealthandwellnessgroup.com)

[WealthandWellnessGroup.com](http://WealthandWellnessGroup.com)

This brochure updates the prior version from our initial registration on September 15, 2025. Material changes to this brochure from this date include:

- Cover Page – New email address.

This Brochure provides information about the qualifications and business practices of Wealth and Wellness Group. If you have any questions about the contents of this Brochure, please contact our office at (888) 267-1138 or via email at [bob.laura@wealthandwellnessgroup.com](mailto:bob.laura@wealthandwellnessgroup.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.

The Firm provides services from offices in one location:

Wealth And Wellness Group  
690 Hope St., Ste B, Brighton, MI 48116  
[WealthandWellnessGroup.com](http://WealthandWellnessGroup.com)  
888-267-1138

This firm is a Registered Investment Advisor. Registration as an Investment Adviser does not imply any certain level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Currently, our Brochure may be requested by contacting Robert Laura, Chief Compliance Officer at 1-248-890-0834 or [bob.laura@wealthandwellnessgroup.com](mailto:bob.laura@wealthandwellnessgroup.com). Our Brochure is also available on our web site [WealthandWellnessGroup.com](http://WealthandWellnessGroup.com), also free of charge.

Additional information about the firm also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You will be able to search this site by the unique identifying number, also known as a CRD. The CRD associated with this Advisor Firm is 337631.

## **Table of Contents**

---

Item 2 – Material Changes_____	3
Item 4 – Advisory Business_____	3
Item 5 – Fees and Compensation_____	5
Item 6 – Performance-Based Fees and Side-By-Side Management_____	7
Item 7 – Types of Clients_____	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss_____	7
Item 9 – Disciplinary Information_____	9
Item 10 – Other Financial Industry Activities and Affiliations_____	9
Item 11 – Code of Ethics_____	10
Item 12 – Brokerage Practices_____	10
Item 13 – Review of Accounts_____	12
Item 14 – Client Referrals and Other Compensation_____	13
Item 15 – Custody_____	13
Item 16 – Investment Discretion_____	13
Item 17 – Voting Client Securities_____	14
Item 18 – Financial Information_____	14
Item 19 – Requirements for State-Registered Advisers_____	14

## **Item 2 – Material Changes**

---

The firm's assets under management are approximately \$58,000,000 as of December 31, 2025. The prior version was our initial filing prior any assets being transferred in.

Mr. Laura was previously dually registered as an investment adviser representative with both Synergos Financial Group, LLC (“Synergos”) and Wealth and Wellness Group LLC (“WWG”). Mr. Laura is no longer registered with Synergos as that business has closed.

All other information is consistent with the prior version of this brochure.

## **Item 4 – Advisory Business**

---

This brochure provides information about the qualifications and business practices of Wealth & Wellness Group, which was organized, in 2025 as a Limited Liability Corporation in the State of Michigan, (the Advisory Firm). The Advisory Firm became registered as an investment adviser in September 2025. Please contact Robert Laura, Chief Compliance Officer, should you have any questions regarding the content of this brochure. The information herein contained has not been approved or verified by the U.S. Securities and Exchange Commission or by any State securities authority.

The Advisory Firm offers personal advisory services to individuals, trusts, estates, charitable organizations, pension plans, profit sharing plans and other business entities. The services may vary in scope but may include portfolio management, second opinion services, financial planning, fiduciary services, investment selection advice and asset allocation.

The Advisory Firm requires a minimum standard of education and experience for individuals providing investment management and financial planning services to Clients. The standard generally requires a Bachelors Degree (or equivalent) or the achievement of a professional designation such as Certified Financial Planning Practitioner, CFP®, or the Chartered Financial Analyst, CFA®.

### **Portfolio Management Services**

The Advisory Firm provides Portfolio Management Services delivering investment advice that is tailored to the needs and investment objectives of the client. Such portfolio management may be provided on a discretionary or non-discretionary basis. Advice may include portfolio management, asset allocation, buy/sell recommendations and possible selection of specific securities for the account of the client. Recommendations are made with client goals and objectives in mind.

Portfolio Management Services are generally priced based on a percentage of assets under management. A client may terminate this service at any time by delivering a 5-day advance written notice.

### **Second Opinion Services**

The Advisory Firm provides a Second Opinion Service, which entails the review and analysis of existing investment portfolios that may include but are not limited to the assets held in qualified

and non-qualified brokerage accounts, corporate retirement plan accounts, mutual fund accounts and annuities. Second Opinion Services are priced as a one-time flat dollar amount based on the size and scope of portfolios reviewed and assets analyzed.

### **Financial Planning Services**

Financial Planning Services are provided as a means to provide advice to the client that is centered around the management of their financial resources in conjunction with their personal needs and objectives. A member of the Advisory Firm will meet with the Client to gather pertinent information and identify specific goals and objectives. A written plan will be drafted based upon the review and analysis of this information. This document will be presented to the Client as a means for developing a plan and strategy to address the Client's cash flow, income needs, assets and debts.

Clients should understand that such plans are predicated on the information provided by the Client, as well as the Client's situation at the time the Plan is prepared.

Certain assumptions may be made with respect to interest rates, rates of inflation, as well as the use of past trends and performance of the various markets and economies. Past performance is not indicative of future performance, and the Advisor cannot provide any promises nor guarantees of the Plan's success. As the situation, goals, needs or objectives of the client may, from time to time, change, the client must promptly contact the Advisor.

### **Fiduciary Services**

The Firm may, in certain situations, serve as Guardian of the Estate or Trustee. The Firm is not a legal professional and is not responsible for the drafting of guardianship or trust documents but shall fulfill their duty as Guardian or Trustee as directed in those documents and as prescribed by applicable statute. Fiduciary Services shall be priced based on a percentage of the assets under management and may be subject to a one-time fee for document review and research, as well as an annual flat fee. When serving as Trustee or Guardian, the Firm acts in a fiduciary capacity pursuant to governing documents and applicable state statutes. Compensation for fiduciary services is disclosed in writing prior to engagement and may be in addition to advisory fees.

Fiduciary tax returns, if required, shall be prepared by an independent CPA firm. Periodically the Firm may seek legal advice regarding specific fiduciary duties. Such fees shall be passed through to the client.

### **Types of Investments**

The Advisory Firm may offer and provide advice and guidance on any financial product deemed appropriate as a means to address the Client's individual needs, goals and objectives. The Advisor may also offer advice on securities and investments maintained in the Client's portfolio at the time the client engages the Advisor.

Client Assets Under Management As of March 9, 2026, the firm manages assets of approximately \$63,023,000 on a discretionary basis. The Firm also manage assets of approximately \$2,200,000 on a non-discretionary basis.

## **Item 5 – Fees and Compensation**

---

The specific manner in which fees are charged by the Advisory Firm is established in a client's written agreement with the Advisory Firm. The Advisory Firm will generally bill its fees, in arrears, on a monthly basis, with asset management fees based on the market value of assets as of the last day of the month. Clients typically authorize the Advisory Firm to directly debit fees from client accounts that are held at a qualified custodian.

Alternatively, clients may elect to be billed directly for some or all of the applicable fees. Accounts initiated or terminated during a calendar month will be charged a prorated fee. Upon termination of any contract, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. Clients will receive notification of all fees. Though not customary, Advisory Fee may be negotiated.

Wealth & Wellness Group began offering an integrated annual flat fee for new client relationships. The flat fee shall cover agreed upon planning, management and advisory services.

Existing clients shall be grandfathered under their currently agreed upon fee schedule. In some circumstances, only asset management fees may apply to new clients.

### **Portfolio Management Fees**

On an annualized basis, fees for portfolio management services are based on the following tiered schedule:

<b>Portfolio Size</b>	<b>Annual Fee</b>
\$ 0.00 to \$1,000,000	1.00%
\$1,000,001 to \$2,500,000	0.75%
\$2,500,001 to \$5,000,000	0.50%
\$5,000,000 and Greater	Negotiable

The management fee is negotiable. Situations involving multiple accounts of immediate family members may be entitled to asset aggregation for the purposes of providing a lower percentage charge on assets under management.

### **Second Opinion Service Fees**

Second Opinion Services shall be charged a minimum flat fee of \$ 500 for the review and analysis of existing portfolios. Additional charges will apply to such Service delivered for additional portfolios and/or a larger number of individual assets. Second Opinion Service fees may be negotiated.

### **Stand Alone Financial Planning Project and Consulting Fees**

Financial Planning Services and Consulting services are offered on an hourly fee basis or a fixed fee scheduled.

A fixed minimum fee of \$1,000 is charged for financial planning services. Additional fees may be due as a result of the specific time and circumstances involved in the preparation of the Plan, and

shall be disclosed to the client in the event such fees may apply. The fee for financial planning services is typically due, in installments, upon the initiation of, and completion and delivery of the Plan.

The firm assesses an hourly rate of \$300 per hour for consulting related to financial planning services. The minimum hourly planning fee is \$ 300, with a minimum charge of \$ 500, per engagement. The number of hours will vary based on the complexity of the financial situation, and shall include time required for meetings, communications, research and preparation.

The hourly fee may be negotiated with the client. All fees for financial planning and consulting shall be agreed upon in advance and in writing. Agreed upon fees that are equal to or less than \$500 shall be collected at the time of engagement. Additional agreed upon fees shall be due at the time those services are delivered.

The Client may terminate this relationship within 5 business days after execution of planning agreements without penalty.

The Advisory Firm or the Client may terminate the planning agreement after the 5 business day period, with written notice. Payment for services provided up to the time of termination will be due and immediately payable by the client. When fees are collected in advance, the client will receive a prorated refund based on the amount of time spent on the plan or service.

### **Fiduciary Service Fees**

In situations where the Advisory Firm may serve as Guardian or Trustee, an additional charge of 10 basis points (0.10%) may be applied to the standard portfolio management fee schedule. The Advisory Firm may also charge an annual fee and a flat fee to conduct an initial review of Guardianship or Trust documentation. While a minimum asset level shall not be required when acting as Guardian or Trustee, a minimum annual fee of \$ 1,500 shall apply to all Fiduciary Service accounts.

The Client may terminate any of the above referenced services within 5 business days after document execution without penalty. Following the 5 business day period, the Advisor or the Client may terminate the management agreement with a 5-day written notice. Payment will be due and immediately payable from the client for any pro rata portion of a billing period during which the agreement is terminated.

### **Other Fees and Expenses**

The Advisory Firm's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, 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, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to the Advisory Firm's fee, and the Advisory Firm shall not receive any portion of these commissions, fees, and costs. Please refer to Item 12 - Brokerage Practices for additional details.

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

The Advisory 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).

## **Item 7 – Types of Clients**

The Advisory Firm generally provides its services to individuals, high-net-worth individuals. The Advisory Firm recognizes that safeguarding the Client privacy is of utmost importance, and places such privacy protection as a top priority. As such, the Advisor has implemented policies and procedures designed to ensure that Client information is maintained private and secure.

The Advisory Firm will never sell information about its current or former Clients or their accounts. Client information will be shared with non-affiliated third parties, such as brokers, transfer agents and custodians, only when necessary to facilitate the acceptance and management of the third-party relationship with the Client. The Advisor may also share information at the request of the Client, or as required by law.

A copy of the Advisor's Privacy Policy notice will be provided to each client prior to or in conjunction with the signing of any financial planning or advisory agreements. The Advisor will also provide a copy of the Privacy Policy notice to all Clients on an annual basis. Advisor does not require a minimum account value to open or maintain an account. While the Firm does not impose a minimum account size requirement, certain services may be subject to minimum annual or project-based fees as disclosed in Item 5.

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

The investment strategies used by Advisor when formulating investment advice or managing assets include Modern Portfolio Theory, diversification, asset allocation, the balancing of return and risk, and fundamental analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance does not guarantee future returns.

Like any investment strategy, ours involves material risks. Such material risks are described in further detail below:

Investing for the long term means that a client's account will be exposed to short-term fluctuations in the market and the behavioral impulse to make trading decisions based on such short-term market fluctuations. Advisor does not condone short-term trading in an attempt to "time" the market, and instead coaches clients to remain committed to their financial goals. However, investing for the long term can expose clients to risks borne out of changes to interest rates, inflation, general economic conditions, market cycles, geopolitical shifts, and regulatory changes.

Inflation risk is the risk that the value of a client's portfolio will not appreciate at least in an amount equal to inflation over time. General micro- and macro-economic conditions may also

affect the value of the securities held in a client's portfolio, and general economic downturns can trigger corresponding losses across various asset classes and security types. Market cycles may cause overall volatility and fluctuations in a portfolio's value, and may increase the likelihood that securities are purchased when values are comparatively high and/or that

securities are sold when values are comparatively low. Geopolitical shifts may result in market uncertainty, lowered expected returns, and general volatility in both domestic and international securities. Regulatory changes may have a negative impact on capital formation and increase the costs of doing business, and therefore result in decreased corporate profits and corresponding market values of securities.

Investing in mutual funds does not guarantee a return on investment, and shareholders of a mutual fund may lose the principal that they've invested into a particular mutual fund. Mutual funds invest into underlying securities that comprise the mutual fund, and as such clients are exposed to the risks arising from such underlying securities.

Mutual funds charge internal expenses to their shareholders (which can include management fees, administration fees, shareholder servicing fees, sales loads, redemption fees, and other fund fees and expenses, e.g.), and such internal expenses subtract from its potential for market appreciation. Shares of mutual funds may only be traded at their stated net asset value ("NAV"), calculated at the end of each day upon the market's close.

Investing in exchange traded funds ("ETFs") bears similar risks and incurs similar costs to investing in mutual funds as described above. However, shares of an ETF may be traded like stocks on the open market and are not redeemable at an NAV. As such, the value of an ETF may fluctuate throughout the day and investors will be subject to the cost associated with the bid-ask spread (the difference between the price a buyer is willing to pay (bid) for an ETF and the seller's offering (asking) price).

Clients are encouraged to carefully read the prospectus of any mutual fund or ETF to be purchased for investment to obtain a full understanding of its respective risks and costs.

Investing in common stocks means that a client will be subject to the risks of the overall market as well as risks associated with the particular company or companies whose stock is owned. These risks can include, for example, changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. Common stocks tend to be more volatile and more risky than certain other forms of investments, especially as compared to fixed income products like bonds.

Investing in fixed income securities issued by the U.S. Government, including Treasury Bills, Treasury Notes, Treasury Bonds, Treasury Inflation-Protected Securities ("TIPS"), and Floating Rate Notes means that a client will be subject to the market prices of such debt securities, which typically fluctuate depending on interest rates, credit quality, and maturity.

In general, market prices of debt securities decline when interest rates rise and rise when interest rates fall. The longer the time to a security's maturity, the greater its interest rate risk. Fixed income securities issued by the U.S. Government are also subject to inflation risk, reinvestment risk, redemption risk, and valuation risk. Investing in municipal securities carries unique risks, depending on the type of bond offered. General obligation bonds are issued by governmental entities and are not backed by revenues from a specific project or source. In some instances, municipalities may not have taxing authority to repay bondholders.

Revenue bonds are backed by revenues from a specific project or source and can vary greatly in terms of credit risk. Some revenue bonds are "non-course" bonds, meaning that should the revenue stream dry up or the conduit borrower fails to pay, the bondholder will not have a claim to the underlying revenue or against the conduit borrower.

Investing in corporate debt, including corporate bonds, carries additional risks to those noted above for fixed income securities. Corporate debt is also subject to credit risk - the risk that the bond issuer may default on one or more payments before the bond reaches maturity. In the event of a default, you may lose some or all of the income you were entitled to, and even some or all of the principal amount invested. Some corporate bonds may also be subject to early redemption risk, with the issuer having the principal repaid prior to the maturity date of the bond.

## **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Advisory Firm or the integrity of its management.

*The Firm has no legal or disciplinary events material to a client's or prospective client's evaluation of the Firm or the integrity of its management.*

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

The Advisory Firm is not currently engaged in any business activities other than giving financial and investment advice. The Advisory Firm itself does not engage in other financial industry activities. Certain associated persons engage in separate outside business activities as disclosed in the applicable Brochure Supplement. The Advisory Firm has no material arrangements or affiliations with any broker-dealer, investment company, other investment advisor, financial planning firm, banking institution, thrift institution, accounting firm, law firm, insurance agency, pension consultant, real estate broker, or any other organization or entity considered part of the financial service industry. The Advisory Firm does not recommend Third Party Investment Advisers.

## **Item 11 – Code of Ethics**

---

The Advisory Firm has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients.

The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, 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 at the Advisory Firm must acknowledge the terms of the Code of Ethics annually, or as amended.

The Advisory Firm anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which it has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which the Advisory Firm, its affiliates and/or clients, directly or indirectly, have a position of interest. The Advisory Firm's employees and persons associated with it are required to follow its Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of the Advisory Firm and its affiliates may trade for their own accounts in securities that are recommended to and/or purchased for the Advisory Firm clients.

The Advisory Firm mitigates any conflicts of interest in two ways. First, its Code of Ethics requires employees to: report personal securities transactions on at least a quarterly basis and provide the Adviser Firm with a detailed summary of certain holdings (both initially upon commencement of employment and quarterly thereafter) in which employees have a direct or indirect beneficial interest. The reports are reviewed to ensure that the Advisory

Firm does not trade ahead of client accounts. Second, the Advisory Firm requires client transactions to be placed ahead of our associates' personal trades or our associates can place personal trades as part of a block trade (Please see Item 12.B for details on our block trading practices). The records of all associates' personal and client trading activities are reviewed and made available to regulators to review on the premises.

Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Robert Laura, Chief Compliance Officer.

## **Item 12 – Brokerage Practices**

---

The Advisory Firm will recommend to the Client brokers such as Charles Schwab, among others. Broker recommendations will be based upon commission rates, quality of execution, record keeping, reporting capabilities, and custodial fees charged by the broker for holding securities for the client, among other things. Situations may occur when a recommended broker may charge a higher fee for a specific transaction, such as a commission rate, than may be charged by another broker. Clients have no obligation to purchase or sell securities through a broker recommended by the Advisor, and may therefore utilize a broker of their choice.

The brokerage firms recommended by the Advisor are not affiliated with the Advisor. Such firms may provide the Advisor and the Client with institutional custody services which are not generally available to retail investors. These services are often provided to independent investment advisors on an unsolicited basis, at no charge, so long as the Advisor maintains a certain minimum level of client assets at the brokerage firm. These arrangements are not otherwise contingent on the Advisor utilizing the brokerage firm for any specific amount of custody or trading business.

These firms may deliver to the Advisor services which include brokerage, custody, research and access to mutual funds/investments that are typically available to institutional investors only, or may require a significantly higher initial investment. The Advisor may also receive from the brokerage firm products and services which may benefit the Advisor but not the Client's account. Such additional services and products assist the Advisor in the management and administration of the Client account.

These may include software and technology that provide access to Client account data, trade confirmations and account statements; facilitate trade execution and asset allocation of multiple Client accounts; provide research, pricing and general market data; assist in the payment of the Advisor's fee from the

Client account; and assist with other back-office functions. Brokerage firms may also provide publications, consulting, information technology, practice management conferences and marketing and regulatory compliance. As a fiduciary, the Advisor conducts itself in the best interest of the Client, and its recommendation of brokerage firms that offer the services noted above may create potential conflicts of interest.

**Aggregation of Trades:** Consistent with the goal of obtaining best execution for Client trades, the Advisor may aggregate the orders of multiple Client accounts, when possible. By aggregating trade orders, each affected account will participate in the weighted average share price of all transactions in a specific security affected to fill such orders on a given business day. The associated transaction costs will be allocated on a pro rata basis for each Client account participating in those transactions.

Allocations of orders for multiple Client accounts will be handled in a fair and equitable fashion. Allocations within accounts of identical or similar investment objectives are made pro rata based on the account size. Neither account performance nor the size or structure of management fees shall have any effect on the allocation to a specific account.

**Best Execution:** The Advisor will generally seek "best execution" when completing Client transactions, but will not obligate itself to seek out the lowest commission or net price for any particular transaction.

The Advisor will primarily evaluate a broker's ability to deliver "best execution" based on historical prices after considering commissions and other transaction-related compensation. Other factors considered by the Advisor will include the execution, clearance, error resolution and settlement capabilities of the broker or dealer generally and in conjunction with the type of securities being bought or sold, the broker or dealer's reliability and financial stability, and the

market for the security being traded. The Advisor will monitor and review the policy for Best Execution no less than annually.

### **Client Directed Brokerage**

Clients who exercise their ability to direct the Advisor to use a particular broker should understand that this direction may prevent the Advisor from aggregating orders with other clients and may inhibit the Advisor's ability to negotiate brokerage compensation on behalf of the Client. The direction for use of a particular broker may also negate the Advisor's ability to obtain the most favorable net price and execution.

As such, Clients must consider whether the trading expenses and execution, as well as the settlement capabilities and clearance of their specified broker may be greater than the amounts charged by another broker who did not provide research services or products.

Research products and services received from brokerage firms, such as Charles Schwab, may include information on specific industries and corporations, financial publications, research software and other products or services that offer lawful and appropriate aid to the Advisor in carrying out its investment decision making duties. These research products and services are provided to all investment advisors utilizing Charles Schwab, and are not considered to be paid for with soft dollars.

The Client must recognize, however, that the commissions charged by a specific broker for a specific transaction or group of transactions may be greater than the charges of another broker who did not provide similar research products or services.

While it is the intention of the Advisor to carry out its fiduciary duty by placing the interest of its Client first, Clients should be aware that the receipt of any compensation itself creates a potential conflict of interest. The Firm evaluates these benefits to ensure they do not compromise its obligation to seek best execution and act in the best interest of clients.

## **Item 13 – Review of Accounts**

---

Accounts shall be reviewed no less than quarterly in conjunction with the Client's stated objectives. Such reviews shall address the stated investment management objective as well as review the individual securities held within the portfolio. Reviews shall also take into account current domestic and global economic conditions. All accounts shall be reviewed by Robert S. Laura, AAMS, CMFC.

Reviews may also be triggered by events within client's lives, as well as pertinent news events, changes in federal and state regulatory or tax regimes, and overall economic events. Clients will receive statements and confirmation, monthly or quarterly, from the custodian holding their assets, as indicated by the Client's agreement with the custodian.

Advisor may provide additional reports, in accordance with Agreement and extent of the Client relationship.

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

The Advisory Firm does not receive other compensation nor provides compensation in respect to referrals or other introductions.

## **Item 15 – Custody**

All client assets are held at third-party custodians. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets.

The Advisory Firm urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Supplemental reports we may generate may vary from official custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. The Advisory Firm may be deemed to have custody of Client assets in situations where it has the ability to periodically direct-debit fees in accordance with prior client authorization. The Advisory

When the Firm is deemed to have custody solely as a result of deducting advisory fees directly from client accounts, the Firm relies on the regulatory exception from the surprise examination requirement, provided client assets are maintained with a qualified custodian and clients receive statements directly from such custodian. In circumstances where the Firm serves as Trustee or Guardian and is deemed to have custody beyond fee deduction authority, the Firm complies with Michigan custody requirements, including obtaining an annual independent audit and distributing financial statements as required by applicable regulations.

Additionally, the SEC issued a no-action letter ("Letter") with respect to the Rule 209(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instructions ("SLOA") is deemed to have custody. As such our Firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.

- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## **Item 16 – Investment Discretion**

The Advisory Firm usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, the Advisory Firm observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, the Advisory Firm's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments. Investment guidelines and restrictions must be provided to the Advisory Firm in writing.

## **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, the Advisory Firm does not have any authority to and does not vote proxies or direct corporate actions on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies and providing direction on corporate actions for any and all securities maintained in client portfolios.

The Advisory Firm may provide advice to clients regarding the clients' voting of proxies. In the event the Advisory Firm is a named Guardian or Trustee, it shall exercise its rights and responsibilities to vote proxies.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Advisory Firm's financial condition. The Advisory Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy proceeding.

On an annual basis, the Firm undergoes a formal balance sheet audit, conducted by an independent certified accounting firm. The resulting Independent Auditor's Report is then submitted to the appropriate regulatory body.

## **Item 19 – Requirements for State-Registered Advisers**

The Advisory Firm has one executive officer, Robert Laura ("Mr. Laura"). Mr. Laura's biographical information is provided in the attached Brochure Supplement Document.

Mr. Laura is required to disclose additional information if he has other business activities. He also is a member of Laura Investment Properties, LLC and member of Retirement Project LLC.

Mr. Laura is also required to disclose additional information if he receives a portion of performance-based fees or has any relationship or arrangement with an issuer of securities. This is not applicable.

We have NOT been involved in any of the events listed below:

An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

An award or other being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- (a) an investment or an investment-related business or activity;
- (b) fraud, false statement(s), or omissions;
- (c) theft, embezzlement, or other wrongful taking of property;
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.