

NextGen Wealth, LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of NextGen Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (816) 287-4780 or by email at: clint.haynes@nextgen-wealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about NextGen Wealth, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. NextGen Wealth, LLC's CRD number is: 172128.

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Registration does not imply a certain level of skill or training.

Version Date: 01/07/2019

Item 2: Material Changes

There are currently no material change on this version of Form ADV Part

2. Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of NextGen Wealth, LLC.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 172128.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (816) 287-4780.

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Item 4: Advisory Business

Business Description

We provide financial planning, manager selection and supervision, and non-discretionary investment advisory services to individuals, high-net-worth individuals, and corporations or business Entities concerning mutual funds and exchange traded funds. As a registered investment adviser, we are held to the highest standard of client care - a fiduciary standard. As a fiduciary we always put our client's interests first and must fully disclose any potential conflict of interest.

A. Description of the Advisory Firm

NextGen Wealth, LLC (hereinafter "NWL") is a Limited Liability Company organized in the State of Missouri.

The firm was formed in June 2014, and is 100% owned by Clint Haynes.

B. Types of Advisory Services

Selection of Other Advisers

NWL may direct clients to third-party registered investment advisers to manage all or a portion of the client's assets. NWL conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. NWL then makes investments with a third-party investment adviser by referring the client to the third-party adviser. Third-party adviser are responsible for continuously monitoring client accounts and making rebalancing trades in client accounts in accordance with the investment management agreements between with the third-party adviser and client. NWL, in accordance with its investment management agreement with clients, will review the ongoing performance of the third-party adviser as a portion of the client's portfolio. NWL is also responsible for responsible for maintaining your current information, including assisting in identification of client risk tolerance and investment objectives, that assist in determining the overall portfolio selection. NWL is available to answer client questions regarding accounts and act as conduit between he or she and the third party investment adviser.

Comprehensive Financial Planning

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

The most commonly used model among our clients involves working one-on-one with a planner over an extended period of time. By paying an upfront fee for the financial plan, The Financial Freedom Blueprint, clients receive ongoing access to a planner who will work with them to design their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date on a periodic basis. The initial fee for the plan will maintain the relationship for 12 months.

Upon designing a comprehensive plan, a client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning and estate planning.

Their plan will be built and analyzed by Clint Haynes and then the findings, analysis and potential changes will be reviewed with the client. The review of the plan typically is 2-3 meetings. The plan will be monitored throughout the year and follow-up phone and/or video calls and emails will be made to the client to confirm that any agreed upon action steps have been carried out. On an annual basis there will be a full review of this plan to ensure its accuracy. Any needed updates will be implemented at that time with an additional cost.

Services Limited to Specific Types of Investments

NWL generally limits its investment advice to mutual funds and exchange trade funds.

C. Client Tailored Services and Client Imposed Restrictions

NWL offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's specific needs. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. NWL does not participate in any wrap fee programs.

E. Assets Under Management

NWL has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0.00	\$16,191,819	12/31/2018

Item 5: Fees and Compensation

A. Fee Schedule

Selection of Other Advisers Fees

NWL directs clients to third-party investment advisers to assist the clients in managing their investments. NWL will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between NWL and each third-party adviser. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

NWL typically direct clients to LWI Financial Inc. ("LWIF") that will act as both third-party investment adviser and third party administrator. LWIF performs certain services such as account administration, portfolio allocation analysis and rebalancing, asset-class investment strategy, back-office fulfillment, report and statement production, and fee debiting. Such services are paid directly through advisory fees billed to the client or are indirectly paid by NWL. LWIF is an investment adviser registered with the Securities and Exchange Commission.

NWL may direct clients to other third-party investment advisers. NWL will be similarly compensated via a fee share from the advisers to which it directs those clients. These relationships will be memorialized in each contract between NWL and each third-party adviser. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

The annual fee schedule is as follows. Fees are calculated by third party investment manager in accordance with the investment management agreement and debited from your account.

Total Assets Under Management	Total Investment Management Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$2,500,000	.80%
\$2,500,001 - and up	.55%

These fees are negotiable with both the third-party investment adviser and NWL. There are currently no account minimum at NWL but third party investment advisors may have account minimums.

Financial Planning Fees

Hourly Fees

The negotiated hourly fee for these services is \$250. Fees are charged in arrears upon completion, or on an ongoing basis along with general consulting services, as described above.

Cost of The Financial Freedom Blueprint

The Financial Freedom Blueprint, Comprehensive Financial Planning, generally consists of a one- time set-up fee of \$500 and an additional fee of \$1,995 due after the completion and implementation of the plan. The fees are negotiable and may be higher depending on the complexity financial profile. This fee serves as the retainer for all financial planning for 12 months from the date the Financial Planning Agreement is signed. At the end of that 12 months, it is up to the client if they would like to extend that service at a cost of \$1,495 for each additional 12 month period.

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

B. Payment of Fees

Payment of Selection of Other Advisers Fees

Fees for selection of LWI Financial Inc. and Betterment Institutional as third-party adviser are withdrawn directly from the client's accounts with client's written authorization. Fees are paid quarterly in advance base on the end of month value for that quarter.

Payment of Financial Planning Fees

Financial planning fees are paid via check, wire, and/or credit/debit card.

Other than the non-refundable setup fee for financial planning, financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third Party Fees

Clients also incur third party fees and expenses (i.e. custodian fees, brokerage fees, mutual fund management fees and expenses, transaction fees, etc.). These costs are paid to third-

party underlying managers, broker-dealers, custodians, and other third-parties and are not paid to or benefit NWL. NWL and third-party advisers generally recommend no-load and transaction fee waived mutual funds to reduce total portfolio expenses to clients. However, clients should nonetheless review mutual fund fees and expenses that are disclosed in fund prospectuses and other brokerage expenses as disclosed in custodial statements and agreements. All these fees are separate and distinct from the investment advisory and financial planning fees charged by NWL. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Fees for selection of third-party managers are paid in advance. For all asset-based fees paid in advance, the fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee by 365.) Refunds for fees paid in advance will be returned within fourteen days to the client via check, return to credit card, or return deposit back into the client's account.

Other than the non-refundable* \$500 setup fee for The Financial Freedom Blueprint, NWL collects its financial planning fees in arrears. [*The \$500 setup fee will be refunded if the agreement is terminated within five business days of signing.]

E. Outside Compensation For the Sale of Securities to Clients

Clint Haynes is also a licensed insurance agent. If a client elects to purchase insurance products from Mr. Haynes in this capacity, he will earn insurance commissions. This is a potential conflict because he may be financially incentivized to make insurance recommendations based on fees or commissions received. Clients are not obligated to implement the insurance recommendations and NWL believes this additional service is ancillary to NWL's primary business of providing investment advisory services.

1. This is a Conflict of Interest

Supervised persons may accept compensation for the sale of securities or other investment products, including asset based sales charges or service fees from the sale of mutual funds to NWL's clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receives compensation, NWL will document the conflict of interest in the client file and inform the client of the conflict of interest.

2. Clients Have the Option to Purchase Recommended Products From Other Brokers

Clients always have the option to purchase NWL recommended products through other brokers or agents that are not affiliated with NWL.

3. Commissions are not the Primary Source of Income for NWL

Commissions are not NWL's primary source of compensation.

4. Advisory Fees in Addition to Commissions or Markups

Advisory fees that are charged to clients are reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

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

Item 7: Types of Clients

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

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Corporations or Business Entities
- ❖ Pensions and Profit Sharing Plans

Minimum Account Size

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

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis and Investment Strategies

NWL's methods of analysis include fundamental analysis and modern portfolio theory.

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

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

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

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

B. Material Risks Involved

Investment Strategies

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

Selection of Other Advisers: Although NWL will seek to select only money managers who will invest clients' assets with the highest level of integrity, NWL's selection process cannot ensure that money managers will perform as desired and NWL will have no control over the day-to-day operations of any of its selected money managers. NWL would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment “style drift” or even regulator breach or fraud.

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

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Market Risk. Either the market as a whole, or the value of an individual company, goes down, resulting in a decrease in the value of client investments. This is often in reaction

to tangible and intangible events and conditions. Political, economic and/or social conditions may trigger market events. This is referred to as systemic risk.

Equity (Stock) Market Risk. Common stocks are susceptible to fluctuations and to volatile increases/decreases in value as their issuers' confidence in or perceptions of the market change. Investors holding common stock (or common stock equivalents) of any issuer are generally exposed to greater risk than if they hold preferred stock or debt obligations of the issuer.

Company Risk. There is always a certain level of company or industry specific risk when investing in stock positions. This is referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that a company may perform poorly or that its value may be reduced based on factors specific to it or its industry (e.g., employee strike, unfavorable media attention).

Exchange Traded Funds and Mutual Funds: Exchange traded fund ("ETF") and mutual fund investments bear additional expenses based on a pro rata share of operating expenses, including potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities held by the ETF or mutual fund. Clients also incur brokerage costs when purchasing ETFs.

Management Risk. Your investments also vary with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our strategies do not produce the expected returns, the value of your investments will decrease.

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

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

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

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

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

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

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

As previously disclosed, Clint Haynes is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. Clients are in no way required to implement an insurance plan through any representative of NWL in such individual's capacity as an insurance agent.

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

As previously disclosed, NWL directs clients to third-party investment advisers to manage all or a portion of the client's assets. NWL is compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between NWL and each third-party advisor. This creates a conflict of interest in that NWL has an incentive to direct clients to the third-party investment advisers that provide NWL with a larger fee split. NWL will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. NWL is limited to recommending third party money managers that have had due diligence completed and have been approved. NWL will ensure that all recommended advisers are licensed or notice filed in the states in which NWL is recommending them to clients.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of NWL may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of NWL to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. NWL will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

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

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

E. Fiduciary Duty

As a fiduciary, our firm and its associate have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligations not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities. Additionally, NWL requires adherence to its Insider Trades Policy.

Item 12: Brokerage Practices

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

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

If you contract for our asset management services, we must use only those custodians that have been approved by NWL. NWL may also execute transactions through a broker-dealer, Loring Ward Securities Inc. ("LWSI"), that is affiliated and under common ownership with LWIF. LWSI is a securities broker-dealer and a member of the Financial Industry Regulatory Authority ("FINRA") that introduces all transactions to its correspondent clearing firm, Charles Schwab, on a fully-disclosed basis. NWL or client may incur additional brokerage commissions, ticket charges or other similar expenses that are collected by LWSI, or another broker-dealer and/or custodian of record. In addition to Schwab, LWSI has relationships with Fidelity Brokerage Services, TD Ameritrade and Pershing.

1. Research and Other Soft-Dollar Benefits

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

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

2. *Brokerage for Client Referrals*

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

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

Custodians utilized by us may make available (at reduced or no cost) other products and services that benefit us but may not benefit our clients' accounts. For example, LWIF may also sponsor educational seminars for the benefit of NWL (and indirectly NWL's clients). Such educational seminars provide NWL with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by LWIF. As a fiduciary, we endeavor to act in our clients' best interests. Our recommendation that clients maintain their assets in accounts at certain broker-dealers or custodians may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by such broker-dealers. This may create a conflict of interest.

B. Aggregating (Block) Trading for Multiple Client Accounts

NWL does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Reviews of Accounts

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

All ongoing accounts are reviewed at least quarterly by Clint Haynes with regard to clients' respective investment policies and risk tolerance levels.

All one-time financial planning accounts are reviewed upon financial plan creation and plan delivery by Clint Haynes.

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

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

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client of NWL's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. NWL will also provide at least quarterly a separate written statement to the client.

Each client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

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

NWL does not receive any economic benefit, directly or indirectly from any third party for advice rendered to NWL's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

NWL does not directly or indirectly compensate any person who is not advisory personnel for client referrals. However, NWL may pay flat fees for lead generation services for prospective clients who have indicated are interested in financial services information generally.

Item 15: Custody

Custody has been defined as having access or control over client funds and/or securities, but does not include the ability to execute transactions in client accounts. Custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody for purposes of the Investment Advisors Act of 1940 and must ensure proper procedures are

implemented. Our procedures do not result in our maintaining custody of client funds and securities apart from the withdrawal of fees.

Although we do not have custody, we have established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client directs, in writing, the creation of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements. When clients have questions about their account statements, they should contact us or the qualified custodian preparing the statement.

Item 16: Investment Discretion

NWL does not have discretion over client accounts at any time.

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

NWL neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

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

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

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

NWL currently has only one management person: Clint Matthew Haynes. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. How Performance-based Fees are Calculated and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.

F. Professional Designations, Licensing & Exams

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2)

stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination - Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience - Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
 - Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
 - Ethics - Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.