

**Item 1: Cover Page**  
**Part 2A of Form ADV: Firm Brochure**  
**March 18, 2024**



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**Chief Compliance Officer**

This brochure provides information about the qualifications and business practices of BetterWealth LLC. If clients have any questions about the contents of this brochure, please contact us toll free at (866) 659-2522; locally at (408) 659-2390; or by email at [sue@BetterWealth.us](mailto:sue@BetterWealth.us). 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 our firm is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #226661.

Please note that the use of the term "registered investment adviser" and description of our firm and/or our associates as "registered" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise clients for more information on the qualifications of our firm and our employees.

## Item 2: Material Changes

The purpose of this page is to inform you of material changes to our brochure. If you are receiving this brochure for the first time, this section may not be relevant to you.

BetterWealth LLC reviews and updates our brochure at least annually to confirm that it remains current. Below is a summary of the material changes made to our brochure with the annual update, dated March 18, 2024:

### ***Item 4 – Advisory Business and Item 5 – Fees & Compensation:***

- We discontinued our Asset Management service, transitioning previous Asset Management clients to our Wealth Management service.

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

- We added language that further describes mutual funds and exchange-traded funds (“ETFs”) and the risks typically associated with those investment types.

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

- We added language clarifying how we seek to mitigate conflicts of interest associated with aggregated trading.

Clients can request a full copy of our Brochure at any time or contact us with any questions that they may have about the above changes.

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## Item 4: Advisory Business

BetterWealth LLC (“we,” “us,” or “our firm,”) provides individuals and other types of clients with a wide array of investment advisory services. Our firm is a limited liability company formed under the laws of the State of California in 2015 and has been in business as an investment adviser since that time. Our firm is owned by Scott Stauffer and Andrew Howard.

The purpose of this Brochure is to disclose the conflicts of interest associated with the investment transactions, compensation and any other matters related to investment decisions made by our firm or its representatives. As a fiduciary, it is our duty to always act in the client’s best interest. This is accomplished in part by knowing our client. Our firm has established a service-oriented advisory practice with open lines of communication for many different types of clients in an effort to help meet their financial goals while remaining sensitive to risk tolerance and time horizons. Working with clients to understand their investment objectives while educating them about our process facilitates the kind of working relationship we value.

### **Types of Advisory Services Offered**

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#### **Wealth Management:**

As part of our Wealth Management service, we provide clients with asset management and financial planning or consulting services. This service is designed in an effort to assist clients in meeting their financial goals through the use of a financial plan or consultation. Our firm conducts client meetings to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what is learned, an investment approach is presented to the client, generally consisting of mutual funds and exchange-traded funds (“ETFs. Additionally, our investment selections, depending on the individual investment objectives and needs of the client, may include short-term fixed income instruments, including but not limited to treasury bills and certificates of deposit (“CDs”).

BetterWealth also occasionally offers advice regarding additional types of investments if we believe they are appropriate to address the individual needs, goals, and objectives of the client or in response to client inquiry. We may offer investment advice on any investment held by the client at the start of the advisory relationship.

Once we determine what our firm deems to be an appropriate portfolio, portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client’s individual needs, stated goals and objectives. Upon client request, our firm generally provides a written summary of observations and recommendations for the planning or consulting aspects of this service.

#### **Sub-Advisory Services:**

Our firm utilizes the sub-advisory services of third party investment advisory firms to aid in the implementation of an investment portfolio designed by our firm. Before selecting a firm, our firm will ensure that the chosen party is properly licensed or registered. Our firm will not offer advice on any specific securities or other investments in connection with this service. We will provide initial due diligence on the third party managers we recommend and ongoing reviews of their management of client accounts. In order to assist in the selection of a third party manager, our firm will gather client

information pertaining to financial situation, investment objectives, and reasonable restrictions to be imposed upon the management of the account.

Our firm will review third party manager reports provided to the client at least annually. Our firm will also contact clients at least annually in order to review their financial situation and objectives, communicate information to third party managers as warranted, and assist the client in understanding and evaluating the services provided by the third party manager. Clients will be expected to notify our firm of any changes in their financial situation, investment objectives, or account restrictions that could affect their financial standing.

#### **Pontera:**

We provide an additional service for accounts not directly held in our custody, but where we do have discretion, and may leverage an Order Management System “Pontera” to implement tax-efficient asset location and opportunistic rebalancing strategies on behalf of the client. These are primarily 401(k) accounts, HSAs, and other assets held outside the custodian that we recommend. On a quarterly basis, we review the available investment options in these accounts, monitor them, and rebalance and implement our strategies in the same way we do other accounts, though using different tools, as necessary.

“Pontera” is a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of client funds since we do not have direct access to client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once client account(s) are connected to the platform, our firm will review the current account allocations. When deemed necessary, we will rebalance the account considering each client’s investment goals and risk tolerance. Any change in allocations will also consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

#### **Retirement Plan Consulting:**

Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring, and reviewing their company’s participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising may include:

- Establishing an Investment Policy Statement – Our firm may assist in the development of a statement that summarizes the investment goals and objectives along with the broad strategies to be employed to meet the objectives.
- Investment Options – Our firm may work with the Plan Sponsor to evaluate existing investment options and make recommendations for appropriate changes.
- Asset Allocation and Portfolio Construction – Our firm may develop strategic asset allocation models to aid Participants in developing strategies to meet their investment objectives, time horizon, financial situation, and tolerance for risk.
- Investment Monitoring – Our firm may monitor the performance of the investments and notify the client in the event of over/underperformance and in times of market volatility.

- **Participant Education** – Our firm may provide opportunities to educate plan participants about their retirement plan offerings, different investment options, and general guidance on allocation strategies.

In providing services for retirement plan consulting, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”). All retirement plan consulting services shall comply with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans (“Plan”) governed by the Employee Retirement Income Security Act of 1974, as amended (“ERISA”). If the client accounts are part of a Plan, and our firm accepts appointment to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) or 3(38) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

### **Tailoring of Advisory Services**

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Our firm offers individualized investment advice to our Wealth Management clients. General investment advice will be offered to our Retirement Plan Consulting clients.

Each Wealth Management client may place reasonable restrictions on the types of investments to be held in the portfolio such as when a client needs to keep a minimum level of cash in the account or does not want our firm to buy or sell certain securities or security types. We reserve the right to limit client-imposed restrictions if we feel that they would limit or prevent us from meeting or maintaining the client’s investment strategy.

### **Participation in Wrap Fee Programs**

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Our firm does not offer or sponsor a wrap fee program.

### **Regulatory Assets Under Management**

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As of December 31, 2023, our firm managed \$492,238,451 on a discretionary basis and \$9,489,492 on a non-discretionary basis for a total of \$501,727,943 of regulatory assets under management.

## **Item 5: Fees & Compensation**

### **Compensation for Our Advisory Services**

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#### **Wealth Management:**

<b>Assets Under Management</b>	<b>Annual Percentage of Assets Charge</b>
\$0 to \$1,999,999.99	1.00%
\$2,000,000 to \$2,999,999.99	0.85%
\$3,000,000 to \$3,999,999.99	0.75%
\$4,000,000 and up	0.65%

Fees to be assessed will be outlined in the advisory agreement to be signed by the client. Fees are negotiable and are generally deducted directly from client account(s). Annualized fees are billed on a pro-rata basis quarterly in advance based on the value of the account(s) on the last day of the previous quarter. The formula used for the calculation is as follows:  $(Annual\ Rate) \times (Total\ Assets\ Under\ Management\ at\ Quarter-End) / 4$ . For new client accounts, the first payment is a pro-rata calculation that takes into consideration the initial value of the portfolio and remaining days in the quarter once the account is funded. Our firm bills on cash balances in client portfolios unless indicated otherwise in writing. When applicable, our firm also bills on margined securities. Adjustments will be made for deposits and withdrawals during the quarter. Upon the client's request, our firm will agree to invoice directly. As part of this process, clients understand the following:

Some accounts are under different fee schedules honoring prior agreements. BetterWealth aggregates related account balances of clients within the same household for purposes of achieving the advisory fee breakpoints listed above. We also manage some family and related accounts without charge.

### **Sub-Advisory Services:**

Our firm's selected third party managers will debit fees for this service as disclosed in the executed advisory agreement between the client and the third party manager. The fees that BetterWealth receives for providing investment management services are separate from the fees charged to clients by third party advisers. The third party managers we recommend will not directly charge you a higher fee than they would have charged without us introducing you to them. Fees under these programs may be billed in arrears or advance, depending on the outside manager's billing methodology, as described in their separate written disclosure documents. Clients should consider the additional cost of paying sub-advisory fees since we do not discount or offset our standard management fee for clients that choose to participate in sub-advisory programs.

### **Pontera:**

Our firm does not charge an additional fee for held away assets such as defined contribution plan participant accounts. Pontera charges a 0.25% fee for those assets. Our firm will not charge clients the 0.25% Pontera fee and will cover the additional cost of this service.

### **Retirement Plan Consulting:**

Our Retirement Plan Consulting services are billed on a fee based on the percentage of Plan assets under management. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Fees based on a percentage of managed Plan assets will not exceed 0.50%. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed consulting agreement.

### **Other Types of Fees & Expenses**

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These transaction fees are separate from our firm's advisory fees and will be disclosed by your custodian(s). Clients will incur transaction fees for trades executed by their chosen custodian via individual transaction charges. Charles Schwab & Co., Inc. ("Schwab") does not generally charge transaction fees for U.S. listed equities and exchange traded funds.

When applicable, clients also pay holdings charges imposed by the chosen custodian for certain investments, charges imposed directly by a mutual fund, index fund, or exchange traded fund, which are disclosed in the fund's prospectus (e.g., fund management fees, IRA and qualified retirement plan fees, mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from custodian, wire transfer fees, etc.). Our firm does not receive a portion of these fees.

### **Termination & Refunds**

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Either party may terminate the advisory agreement signed with our firm for Wealth Management services in writing at any time. Upon notice of termination our firm will process a pro-rata refund of the unearned portion of the advisory fees charged in advance.

Either party to a Retirement Plan Consulting Agreement may terminate at any time by providing written notice to the other party. Full refunds will only be made in cases where cancellation occurs within 5 business days of signing an agreement. After 5 business days from initial signing, either party must provide the other party with 30 days written notice to terminate billing. Billing will terminate 30 days after receipt of termination notice. Clients will be charged on a pro-rata basis, which considers work completed by our firm on behalf of the client. Clients will incur charges for bona fide advisory services rendered up to the point of termination (determined as 30 days from receipt of said written notice) and such fees will be due and payable.

### **Commissionable Securities Sales**

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Our firm and representatives do not sell securities for a commission in advisory accounts.

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

Neither our firm nor the third party managers we recommend charge performance-based fees or other fees based on a share of capital gains or capital appreciation of the assets of a client.

## **Item 7: Types of Clients & Account Requirements**

Our firm has the following types of clients:

- Individuals and High Net Worth Individuals;
- Trusts, Estates or Charitable Organizations;
- Pension and Profit-Sharing Plans; and
- Corporations, Limited Liability Companies and/or Other Business Types

Typically, our advisory clients have a liquid net worth valued from \$1,000,000 to \$25,000,000. While our firm does not require a minimum account balance for our Wealth Management services, we reserve the authority to terminate a client account or reject a prospective client if we determine that the size of an account is too small to effectively service and/or causes our total costs to increase to abnormally high sums in relation to advisory fees paid by the client. As a fiduciary, our firm always acts in our clients' best interests.



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

### Methods of Analysis

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We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Our firm relies on several sources for information to analyze investment securities and develop portfolio management strategies and allocations. We use publicly available research reports regarding individual securities, mutual funds constructed from these securities, and exchange traded funds. Sources we use may include but are not limited to historical and forward-looking asset class returns; industry white papers and research publications, other brokerage firm research reports and white papers, newspapers, financial websites, various financial periodicals, and financial trade journals and periodic discussions with fund managers and professional colleagues. Our firm also has access to well-known academic researchers who provide in-depth research materials and education.

### Investment Strategies We Use

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Our firm's clients usually have a long-term investment perspective of at least 5 to 7 years (and sometimes 15 to 20 years or more). The analysis of asset classes includes reviewing historical and expected rates of return, standard deviations, and correlation coefficients between asset classes. Except in rare circumstances such as for very small portfolios, investment policy statements with target asset allocations are prepared in recognition of each client's risk tolerance investment objectives and constraints and long-term goals. Occasionally, our firm will purchase certain securities for shorter-term needs. For example, when harvesting tax losses, our firm will generally purchase replacement funds that are similar to a client's portfolio funds and hold them for 31 days to avoid wash sale rules. The original funds are usually then repurchased. Another example of a short-term holding period is when cash or other short maturity fixed income security is held for a client's short-term funding goals. We consider the trading costs of these strategies and only recommend them to clients when the expected after-tax benefits exceed expected costs. Upon client request, we will utilize mutual funds and/or ETFs that focus on environmental, social and governance ("ESG") investments.

Investment policy statements and/or client notes are updated to reflect any changes requested by the client or recommended by our firm.

**Margin Transactions:** Upon a client's request, our firm may purchase stocks, mutual funds, and/or other securities for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash and allows us to purchase stock without selling other holdings. Margin accounts and transactions are risky and not necessarily appropriate for every client. The potential risks associated with these transactions are (1) You can lose more funds than are deposited into the margin account; (2) the forced sale of securities or other assets in your account; (3) the sale of securities or other assets without contacting you; and (4) you may not be entitled to choose which securities or other assets in your account(s) are liquidated or sold to meet a margin call.

## **Risk of Loss**

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Investing in securities involves risk of loss that clients should be prepared to bear. While markets sometimes increase resulting in potential account gains, markets also decrease, which generally results in account losses. It is important that clients understand the risks associated with investing in securities markets, and that their assets are appropriately diversified in investments. Clients are encouraged to ask our firm any questions regarding their risk tolerance.

### *Mutual Funds*

A mutual fund is a company that pools money from many investors and invests the money in stocks, bonds, short-term money-market instruments, other securities or assets, or some combination of these investments. The portfolio of the fund consists of the combined holdings it owns. Each share represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate. The price that investors pay for mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase.

The benefits of investing through mutual funds include:

Professionally Managed – Mutual funds are professionally managed by investment advisers who research, select, and monitor the performance of the securities the fund purchases.

Diversification – Mutual funds typically have the benefit of diversification, which is an investing strategy that generally sums up as “Don’t put all your eggs in one basket.” Spreading investments across a wide range of companies and industry sectors can help lower the risk if a company or sector fails. Some investors find it easier to achieve diversification through ownership of mutual funds rather than through ownership of individual stocks or bonds.

Liquidity – Generally, mutual fund investors can readily redeem their shares at the current net asset value (NAV), less any fees and charges assessed on redemption. Less frequently, some mutual funds have the option to redeem shares using the underlying stocks in the fund's portfolio or may delay redemption for a defined period.

Mutual funds also have features that some investors might view as disadvantages:

Costs Despite Negative Returns – Mutual funds pay operating and other expenses from fund assets regardless of how the fund performs, which are indirectly charged to all holders of the mutual fund shares. Depending on the timing of their investment, investors may also have to pay taxes on any capital gains distribution they receive. This includes instances where the fund went on to perform poorly after purchasing shares.

Lack of Control – Investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

Price Uncertainty – With an individual stock, investors can obtain real-time (or close to real-time) pricing information with relative ease by checking financial websites or by calling a broker or investment adviser. Investors can also monitor how a stock's price changes from hour to hour, or even second to second. By contrast, with a mutual fund, the price at which an investor purchases or redeems shares will typically depend on the fund's NAV, which the fund might not calculate until

many hours after the investor placed the order. In general, mutual funds must calculate their NAV at least once every business day, typically after the major U.S. exchanges close.

**Tax Consequences of Mutual Funds** – When investors buy and hold an individual stock or bond, the investor must pay income tax each year on the dividends or interest the investor receives. However, the investor will not have to pay any capital gains tax until the investor actually sells and makes a profit. Mutual funds are different. When an investor buys and holds mutual fund shares, the investor will owe income tax on any ordinary dividends in the year the investor receives or reinvests them. Moreover, in addition to owing taxes on any personal capital gains when the investor sells shares, the investor may have to pay taxes each year on the fund's capital gains. That is because the law requires mutual funds to distribute capital gains to shareholders if they sell securities for a profit that cannot be offset by a loss.

#### *Exchange-Traded Funds (ETFs)*

An ETF is a type of security (usually, an open-end fund or unit investment trust) containing a basket of stocks, fixed income instruments, and/or commodities. Typically, the objective of an ETF is to achieve returns similar to a particular market index, including sector indexes. An ETF is similar to an index fund in that it will primarily invest in securities of companies that are included in a selected market. Unlike traditional mutual funds, which can only be redeemed at the end of a trading day, ETFs trade throughout the day on an exchange. Like mutual funds, the prices of the underlying securities and the overall market generally affect ETF prices. Similarly, factors affecting a particular industry segment generally affect ETF prices that track that particular sector.

#### *Cash and Cash Equivalents*

Our firm generally invests client cash balances in money market funds, cash sweeps, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, our firm seeks positive returns on client cash balances through what we deem to be relatively low-risk conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our Wealth Management services, as applicable.

Upon request, clients are generally able to borrow against the securities held in their accounts utilizing margin loans offered by their custodian. However, since margin borrowing increases investment risk and raises costs for clients, our firm does not generally utilize margin as an investment strategy for our clients.

### **Item 9: Disciplinary Information**

Our firm and personnel seek to maintain the highest level of business professionalism, integrity, and ethics. There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

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

Our firm has no other financial industry activities or affiliations to disclose.

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

As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to always act solely in the best interest of each of our clients. Our fiduciary duty is the underlying principle for our firm's Code of Ethics, which includes procedures for personal securities transactions and insider trading. Our firm requires all representatives to conduct business with the highest level of ethical standards and to always comply with all federal and state securities laws. Upon employment with our firm, and at least annually thereafter, all representatives of our firm will acknowledge receipt, understanding and compliance with our firm's Code of Ethics. Our firm and representatives must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Our firm recognizes that the personal investment transactions of our representatives demand the application of a Code of Ethics with high standards and requires that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, our firm also believes that if investment goals are similar for clients and for our representatives, it is logical, and even desirable, that there be common ownership of some securities.

In order to prevent conflicts of interest, our firm has established procedures for transactions affected by our representatives for their personal accounts<sup>1</sup>. To monitor compliance with our personal trading policy, our firm has pre-clearance requirements and a quarterly securities transaction reporting system for all our representatives.

Related persons of our firm may buy or sell securities and other investments that are also recommended to clients. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics.

Likewise, related persons of our firm buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. To minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics. Further, our related persons will refrain from buying or selling the same securities prior to buying or selling for our clients in the same day unless included in a block trade.

## Item 12: Brokerage Practices

### Selecting a Brokerage Firm

While our firm does not maintain physical custody of client assets, we are deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts and for certain

<sup>1</sup> For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

money movement authorizations we utilize in servicing clients (see *Item 15 Custody*, below). Client assets must be maintained by a qualified custodian. Our firm seeks to recommend a custodian who will hold client assets and execute transactions on terms that are more advantageous when compared to other available providers and their services. The factors considered, among others, are these:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

With this in consideration, our firm recommends Charles Schwab & Co. Inc., (“Schwab”), a FINRA-registered broker-dealer, member SIPC, as our qualified custodian. Schwab offers services to independent investment advisers like us including custody of securities, trade execution, clearance, and settlement of transactions. Schwab enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Schwab does not charge client accounts separately for custodial services. When applicable, client accounts will be charged transaction fees, commissions or other fees on trades that are executed or settle into the client’s custodial account. However, Schwab does not generally charge transaction fees for U.S. listed equities and exchange-traded funds. Transaction fees are generally discounted from customary retail commission rates. This can potentially benefit clients when the overall fee paid is lower than what other custodial brokers charge.

Schwab makes certain research and brokerage services available at no additional cost to our firm. Research products and services provided by Schwab may include: research reports on recommendations or other information about particular companies or industries, economic surveys, data and analyses, financial publications, portfolio evaluation services, financial database software and services, computerized news and pricing services, quotation equipment for use in running software used in investment decision-making, and other products or services that provide lawful and appropriate assistance by Schwab to our firm in the performance of our investment decision-making responsibilities.

Schwab does not make client brokerage commissions generated by client transactions available for our firm’s use. The research and brokerage services are used by our firm to manage accounts. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As part of our fiduciary duty to our clients, our firm will always endeavor to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons creates a potential conflict of interest and may indirectly influence Schwab as a custodial recommendation. Our firm examines this potential conflict of interest periodically as we continue recommending Schwab and that the recommendation remains in the best interest of our firm’s clients and satisfies our fiduciary obligations, including our duty to seek best execution.

Our clients may pay a transaction fee or commission to Schwab that is higher than another qualified broker dealer might charge to affect the same transaction where our firm determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services provided to the client as a whole.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Although our firm will seek competitive rates to the benefit of all clients, our firm may not necessarily obtain the lowest possible commission rates for specific client account transactions.

### **Directed Brokerage**

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Neither our firm nor any of our firm's representatives have discretionary authority in making the determination of the brokers-dealers and/or custodians with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are affected. Our firm generally requires the use of Schwab for execution of client transactions. Each client will be required to establish their account(s) with Schwab if not already done. Please note that not all advisers have this requirement.

### **Special Considerations for ERISA Clients**

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A retirement or ERISA plan client may direct all or part of portfolio transactions for its account through a specific broker or dealer in order to obtain goods or services on behalf of the plan. Such direction is permitted provided that the goods and services provided are reasonable expenses of the plan incurred in the ordinary course of its business for which it otherwise would be obligated and empowered to pay. ERISA prohibits directed brokerage arrangements when the goods or services purchased are not for the exclusive benefit of the plan. Consequently, our firm will request that plan sponsors who direct plan brokerage provide us with a letter documenting that this arrangement will be for the exclusive benefit of the plan.

### **Client-Directed Brokerage**

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Our firm does not allow client-directed brokerage outside our recommendations. Clients must use the broker-dealer that our firm recommends. Not all investment advisers require their clients to trade through specific brokerage firms. Since we require most of our clients to maintain their accounts with Schwab, it is also important for clients to consider and compare the significant differences between having assets custodied at another broker-dealer, bank, or other custodian prior to opening an account with us. Some of these differences include but are not limited to total account costs, trading freedom, transaction fees/commission rates, and security and technology services. By requiring clients to use Schwab, our firm believes we may be able to more effectively manage the client's portfolio, achieve favorable execution of client transactions, and overall lower the costs to the portfolio.

Clients with 401(k) or 529 Plan accounts that we agree to manage are not required to use Schwab and may appoint a custodian of their choosing.

## Aggregation of Purchase or Sale

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### *Exchange-Traded Funds (ETFs)*

BetterWealth aggregates transactions in ETFs if we believe that aggregation is consistent with the duty to seek best execution for our clients and is consistent with the disclosures made to clients and terms defined in the client investment advisory agreement. No advisory client will be favored over any other client, and each account that participates in an aggregated order will participate at the average share price for all transactions in that security on a given business day. Aggregating trades in like securities among client accounts as well as with accounts of BetterWealth and our personnel presents a potential conflict of interest as it could create an incentive to allocate more favorable executions to our own accounts or the accounts of our personnel. Our policies to address this conflict are as follows:

1. We will disclose our aggregation policies in this brochure;
2. We will not aggregate transactions unless we believe that aggregation is consistent with our duty to seek best execution (which includes the duty to seek best price) for our clients. The trade also needs to be consistent with the terms of our investment advisory agreement with each client that has an account included in the aggregation;
3. We will not favor any account over any other account. This includes accounts of BetterWealth or any of our personnel. Each account in the aggregated order will participate at the average share price for all of our transactions in a given security on a given business day (per custodian). All accounts will pay their individual transaction costs;
4. Before entering an aggregated order, we will prepare a written statement (the "Allocation Statement") specifying the participating accounts and how we intend to allocate the order among those accounts;
5. If the aggregated order is filled entirely, we will allocate shares among clients according to the Allocation Statement; if the order is partially filled, we will allocate it pro-rata according to the Allocation Statement.
6. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reasons for different allocation is explained in writing and is approved by the CCO;
7. Our books and records will separately reflect each aggregated order and the securities held by, bought, and sold for each client account;
8. Funds and securities of clients participating in an aggregated order will be deposited with one or more qualified custodians. Clients' cash and securities will not be held collectively any longer than is necessary to settle the trade on a delivery versus payment basis. Following settlement, cash or securities held collectively for clients will be delivered out to the qualified custodian as soon as practical;

9. We do not receive additional compensation or remuneration of any kind as a result of aggregating orders; and
10. We will provide individual investment advice and treatment to each client's account.

#### *Mutual Funds*

Mutual funds are priced once daily. As the daily price is the same for each investor, we have no opportunity to obtain better pricing through aggregating. Additionally, the broker-dealer/custodians charge each account an individual transaction fee regardless of whether we aggregate or not, so we are unable to lower trading costs through aggregation.

### **Item 13: Review of Accounts or Financial Plans**

Our financial advisors review accounts on at least a quarterly basis for our Wealth Management clients. The nature of these reviews is to learn whether client accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies as applicable. The client's independent custodian sends statements at least quarterly showing the market values for each security included in the Assets and all account disbursements, including the amount of the advisory fees paid to our firm. Our firm does not provide written reports to clients unless asked to do so. Verbal reports to clients take place on at least an annual basis when our Wealth Management clients are contacted. Our firm may review client accounts more frequently than described above. Among the factors which may trigger an off-cycle review are major market or economic events, the client's life events, requests by the client, etc.

Retirement Plan Consulting clients receive reviews of their retirement plans for the duration of the service. Our firm also provides ongoing services where clients are met upon their request to discuss updates to their plans, changes in their circumstances, etc. Retirement Plan Consulting clients do not receive written or verbal updated reports regarding their plans unless they choose to engage our firm for ongoing services.

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

#### **Charles Schwab & Co., Inc. ("Schwab")**

Our firm receives economic benefit from Schwab in the form of the support products and services made available to our firm and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our firm, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability of Schwab's products and services is not based on our firm giving particular investment advice, such as buying particular securities for our clients.



## Referral Fees

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Our firm does not pay referral fees to independent promoters/solicitors for the referral of clients to our firm in accordance with Rule 206 (4)-1 of the Investment Advisers Act of 1940.

Our firm may refer clients to various third parties to provide certain financial services necessary to meet the goals of the client. Our firm does not accept compensation from third parties for client referrals. Likewise, our firm may receive referrals of new clients from third-party professionals. Consequently, a potential conflict of interest exists with any indirect economic benefit from this practice, as the relationships are mutually beneficial. For example, there could be an incentive for us to recommend services of firms who refer clients to us.

## Item 15: Custody

### Deduction of Advisory Fees:

While our firm does not maintain physical custody of client assets (which are maintained by a qualified custodian, as discussed above), we have limited custody of our clients' funds or securities when authorized to deduct our management fees directly from the clients' accounts. A qualified custodian (generally a broker-dealer, bank, trust company, or other financial institution) holds clients' funds and securities. We are also deemed to have custody of certain client assets if given the authority to withdraw assets from client accounts, as further described below under "Third Party Money Movement."

All our clients receive account statements directly from their qualified custodian(s) at least quarterly upon opening of an account. We urge our clients to carefully review these statements. Additionally, if our firm decides to send its own account statements to clients, such statements will include a legend that recommends the client compare the account statements received from the qualified custodian with those received from our firm. Clients are encouraged to raise any questions with us about the custody, safety or security of their assets and our custodial recommendations.

### Third Party Money Movement:

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(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 instruction ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with Schwab:

- 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**

Clients who wish to utilize our Wealth Management services must provide our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, our firm is authorized to execute securities transactions, determine which securities are bought and sold, and the total amount to be bought and sold. Should clients grant our firm non-discretionary authority, our firm would be required to obtain the client's permission prior to affecting securities transactions. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement.

### **Item 17: Voting Client Securities**

Our firm does not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. If proxies are sent to our firm, our firm will forward them to the appropriate client and ask the party who sent them to mail them directly to the client in the future. Clients may call, write, or email us to discuss questions they may have about particular proxy votes or other solicitations.

### **Item 18: Financial Information**

Our firm is not required to provide financial information in this Brochure because:

- Our firm does not require the prepayment of more than \$1,200 in fees when services cannot be rendered within 6 months.
- Our firm does not take custody of client funds or securities.
- Our firm does not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.
- Our firm has never been the subject of a bankruptcy proceeding.

**Item 1: Cover Page**  
**Form ADV, Part 2B Brochure Supplements**  
**March 18, 2024**



**Scott Stauffer, CFP®, AIF®**  
**Andrew Howard, CFP®, AIF®**  
**Jodee Lownsbury, CFP®**  
**James Graham**  
**Suzanne Cox**

**BetterWealth LLC**  
**1475 Saratoga Avenue, Suite 200**  
**San Jose, California 95129**  
**(866) 659-2522**

This brochure supplement provides information about Scott Stauffer, Andrew Howard, Jodee Lownsbury, James Graham, and Suzanne Cox that supplements the BetterWealth LLC brochure. You should have already received a copy of that brochure. Please contact us at the number on the front page of this brochure if you did not receive our brochure or if you have any questions about the contents of this supplement. Additional information about the above named individuals is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Description of Professional Designations Used in this Brochure Supplement\*

### *<sup>1</sup>CERTIFIED FINANCIAL PLANNER™*

Certain persons, as identified in this Supplement below, are certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, they may refer to themselves as CERTIFIED FINANCIAL PLANNER™ professionals or CFP® professionals and may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.CFP.net](http://www.CFP.net).

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this

commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

## *<sup>2</sup>Accredited Investment Fiduciary*

The Accredited Investment Fiduciary (“AIF®”) designation is issued by the Center for Fiduciary Studies. To earn the designation, each AIF® candidate must complete either a web-based or a capstone program, pass a final certification exam, and complete a minimum of 6 hours of continuing education per year.

AIF® designees must also sign and agree to abide by a code of ethics. More information regarding the AIF is available at [http://www.fi360.com/main/designations\\_aif.jsp](http://www.fi360.com/main/designations_aif.jsp).

## **W. SCOTT STAUFFER**

**Year of Birth:** 1963

### **Item 2: Educational Background & Business Experience**

#### **Educational Background:**

- 2001: University of California, Davis; Master of Business Administration
- 1986: Grinnell College; Bachelor of Arts

#### **Business Background:**

- 05/2015 – Present BetterWealth, LLC; Principal
- 10/2012 – 05/2015 Wealth Design, LLC; Managing Partner
- 11/2012 – 05/2015 Comprehensive Asset Management and Servicing, Inc.;  
Registered Representative
- 09/2006 – 10/2012 Edward Jones; Investment Adviser Representative
- 02/2002 – 10/2012 Edward Jones; Registered Representative

#### **Exams, Licenses & Other Professional Designations:**

- <sup>1</sup>CERTIFIED FINANCIAL PLANNER™, CFP®
- <sup>2</sup>Accredited Investment Fiduciary (AIF®)
- 09/2006: Series 65 Exam
- 02/2002: Series 7 & Series 63 Exams (Inactive)

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Mr. Stauffer.

### **Item 4: Other Business Activities**

Mr. Stauffer does not have any outside business activities to report.

### **Item 5: Additional Compensation**

Mr. Stauffer does not receive any other economic benefit for providing advisory services in addition to advisory fees.

### **Item 6: Supervision**

Sue Cox, Chief Compliance Officer of BetterWealth, LLC, supervises and monitors Mr. Stauffer's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Ms. Cox if you have any questions about Mr. Stauffer's brochure supplement at (408) 659-2390.

## **ANDREW HOWARD**

**Year of Birth:** 1979

### **Item 2: Educational Background & Business Experience**

**Andrew Howard**

**Year of Birth:** 1979

**Educational Background:**

- 2001: California Polytechnic State University; Bachelor of Arts in Business Administration; Concentration in Finance with a minor in Economics

**Business Background:**

- 07/2017 – Present BetterWealth, LLC; Principal
- 07/2007 – 07/2017 Edward Jones; Investment Adviser Representative
- 03/2004 – 07/2017 Edward Jones; Registered Representative

**Exams, Licenses & Other Professional Designations:**

- <sup>1</sup>CERTIFIED FINANCIAL PLANNER™, CFP®
- <sup>2</sup>Accredited Investment Fiduciary (AIF®)
- 07/2007: Series 66 Exam
- 03/2004: Series 7 & Series 63 Exams (Inactive)

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Mr. Howard.

### **Item 4: Other Business Activities**

Mr. Howard does not have any other business activities to disclose.

### **Item 5: Additional Compensation**

Mr. Howard does not receive any other economic benefit for providing advisory services in addition to advisory fees.

### **Item 6: Supervision**

Sue Cox, Chief Compliance Officer of BetterWealth, LLC, supervises and monitors Mr. Howard's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Ms. Cox if you have any questions about Mr. Howard's brochure supplement at (408) 659-2390.

## **JODEE D. LOWNSBURY**

**Year of Birth:** 1990

### **Item 2: Educational Background & Business Experience**

**Jodee D. Lownsbury**

**Year of Birth:** 1990

**Educational Background:**

- 2013: California State University, Fresno; Bachelor of Arts in Business Administration

**Business Background:**

- 05/2015 – Present      BetterWealth, LLC; Director of Financial Planning
- 09/2014 – 04/2015      Wealth Design, LLC; Financial Planning Associate

**Exams, Licenses & Other Professional Designations:**

- <sup>1</sup>CERTIFIED FINANCIAL PLANNER™, CFP®

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Ms. Lownsbury.

### **Item 4: Other Business Activities**

Ms. Lownsbury does not have any outside business activities to report.

### **Item 5: Additional Compensation**

Ms. Lownsbury does not receive any other economic benefit for providing advisory services in addition to advisory fees.

### **Item 6: Supervision**

Sue Cox, Chief Compliance Officer of BetterWealth, LLC, supervises and monitors Ms. Lownsbury's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Ms. Cox if you have any questions about Ms. Lownsbury's brochure supplement at (408) 659-2390.



## **JAMES RICHARD GRAHAM**

**Year of Birth:** 1958

### **Item 2: Educational Background & Business Experience**

**James Richard Graham**

**Year of Birth:** 1958

**Educational Background:**

- 1985: Golden Gate University
- 1984: Brigham Young University; Bachelor of Science in Finance

**Business Background:**

- 10/2023 – Present      BetterWealth, LLC; Investment Adviser Representative
- 10/2003 – Present      Greenberg Graham Advisers, LLC; Principle/Investment Adviser Representative

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Mr. Graham.

### **Item 4: Other Business Activities**

Mr. Graham does not have any other business activities to disclose.

### **Item 5: Additional Compensation**

Mr. Graham does not receive any other economic benefit for providing advisory services in addition to advisory fees.

### **Item 6: Supervision**

Sue Cox, Chief Compliance Officer of BetterWealth, LLC, supervises and monitors Mr. Graham's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Ms. Cox if you have any questions about Mr. Graham's brochure supplement at (408) 659-2390.

**SUZANNE COX**  
**Year of Birth:** 1966

## **Item 2: Educational Background & Business Experience**

**Suzanne Cox**  
**Year of Birth:** 1966

### **Educational Background:**

- 1991: University of California, Santa Cruz; Bachelor of Arts in Mathematics

### **Business Background:**

- 01/2020 – Present BetterWealth, LLC; Chief Compliance Officer
- 05/2015 – 12/2019 BetterWealth, LLC; Chief Operations Officer
- 08/2014 – 05/2015 Comprehensive Asset Management and Servicing, Inc.; Registered Representative

### **Exams, Licenses & Other Professional Designations:**

- 12/2008: Series 66 Exam

### **Previously Held Exams, Licenses & Other Professional Designations:**

- 10/2008: Series 31 Exam
- 03/2004: Series 9 Exam
- 02/2004: Series 10 Exam
- 06/1998: Series 24 Exam
- 09/1996: Series 7 Exam & Series 63 Exam
- 01/1993: Series 2 Exam

## **Item 3: Disciplinary Information**

There are no legal or disciplinary events material to the evaluation of Ms. Cox.

## **Item 4: Other Business Activities**

Ms. Cox does not have any outside business activities to report.

## **Item 5: Additional Compensation**

Ms. Cox does not receive any other economic benefit for providing advisory services in addition to advisory fees.

## **Item 6: Supervision**

W. Scott Stauffer is a principal of BetterWealth, LLC and as such supervises and monitors Ms. Cox's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Stauffer if you have any questions about Ms. Cox's brochure supplement at (408) 659-2390.

## FACTS

### WHAT DOES BETTERWEALTH LLC ("BETTERWEALTH") DO WITH YOUR PERSONAL INFORMATION?

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- account balances and transaction history
- assets and risk tolerance

When you are *no longer* our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons BetterWealth chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does BetterWealth share?	Can you limit this sharing?
<b>For our everyday business purposes -</b> as permitted by law	YES	NO
<b>For our marketing purposes -</b> to offer our products and services to you	NO	We Don't Share
<b>For joint marketing with other financial companies</b>	NO	We Don't Share
<b>For our affiliates' everyday business purposes -</b> information about your transactions and experiences	NO	We Don't Share
<b>For our affiliates' everyday business purposes -</b> information about your creditworthiness	NO	We Don't Share
<b>For nonaffiliates to market to you</b>	NO	We Don't Share

#### Questions?

Call (866) 659-2522 or go to [www.BetterWealth.us](http://www.BetterWealth.us)

## WHO WE ARE

Who is providing this notice?	BetterWealth LLC ("BetterWealth")
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## WHAT WE DO

How does BetterWealth protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
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How does BetterWealth collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"><li>• seek advice about your investments</li><li>• enter into an investment advisory contract</li><li>• tell us about your investment or retirement portfolio</li><li>• tell us about your investment or retirement earnings</li><li>• give us your contact information</li></ul> <p>We also collect your personal information from other companies.</p>
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Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"><li>• sharing for affiliates' everyday business purposes - information about your creditworthiness</li><li>• affiliates from using your information to market to you</li><li>• sharing for nonaffiliates to market to you</li></ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
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## DEFINITIONS

Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"><li>• <i>BetterWealth has no affiliates</i></li></ul>
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Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"><li>• <i>BetterWealth does not share with nonaffiliates so they can market to you.</i></li></ul>
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Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"><li>• <i>BetterWealth doesn't jointly market.</i></li></ul>
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