

**Estate Counselors, LLC
d/b/a: The Milwaukee Company
September 18, 2026**

FORM CRS

The Milwaukee Company is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?

We offer **Portfolio Management Services** to retail investors. We also offer financial planning services.

Account Monitoring: If you open an investment account with our firm, as part of our standard service we will monitor your investments on a monthly basis.

Investment Authority: We manage investment accounts on a **discretionary** basis whereby **we will decide** which investments to buy or sell for your account. We have discretion to select, retain or replace third-party managers to manage your accounts. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with your restrictions and guidelines in writing. We also offer **non-discretionary** investment management services whereby we will provide advice, but **you will ultimately decide** which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Investment Offerings: We primarily recommend index-based exchange-traded funds, and one of our strategies invests primarily in individual stocks. We are not limited to any single type of security.

Account Minimums and Requirements: In general, we require a minimum of \$500,000 to open and maintain an advisory account, which may be waived in our discretion.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A, Items 4, 7, and 8 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/123452>.

Key Questions to Ask Your Financial Professional

- **Given my financial situation, should I choose an investment advisory service? Why or Why Not?**
- **How will you choose investments to recommend to me?**
- **What is your relevant experience, including your licenses, education and other qualifications?**
- **What do these qualifications mean?**

What fees will I pay?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

- **Asset Based Fees** - The fees we receive are asset-based (i.e. based on the value of your account), and are payable monthly in arrears. Because our fees are asset based, we have an incentive to increase your account value.
- **Additional Fees and/or Expenses** - Examples of the most common fees and costs applicable to our clients are:
 - Custodian fees;
 - Account maintenance fees;
 - Fees charged by mutual funds and exchange-traded funds in which our clients invest, including the two funds we advise; and
 - Transaction charges when purchasing or selling securities.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For detailed information, refer to our Form ADV Part 2A Brochure by clicking this link <https://adviserinfo.sec.gov/firm/brochure/123452>.

Key Questions to Ask Your Financial Professional

- **Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?**

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

- Because our revenue is derived from asset-based fees, we have an incentive to grow your account as much as possible. This creates an incentive for us to invest your account aggressively, which could be in conflict with your interest to invest conservatively or preserve principal
- We advise two exchange-traded funds, The Brinsmere Fund – Growth ETF and The Brinsmere Fund – Conservative ETF, and receive a management fee from each. We may invest part of your account in these Funds where appropriate for you. Our advisory fee is not reduced by that management fee, so those assets bear both fees, giving us an incentive to use Funds we advise.

Key Questions to Ask Your Financial Professional

- **How might your conflicts of interest affect me, and how will you address them?**

Refer to our Form ADV Part 2A Brochure by clicking this link <https://adviserinfo.sec.gov/firm/brochure/123452> to help you understand what conflicts exist.

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated by receiving a salary and a bonus. Financial professionals' compensation is based on work responsibilities, Job performance and account performance. This could encourage employees to take overly-aggressive positions in an effort to improve your account performance. Compensation may also reflect the profitability of the exchange-traded funds we advise, creating an incentive to invest client assets in those Funds.

Do you or your financial professionals have legal or disciplinary history?

No, our firm and our financial professionals currently do not have any legal or disciplinary history to disclose. Visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple research tool.

Key Questions to Ask Your Financial Professional

- **As a financial professional, do you have any disciplinary history? For what type of conduct?**

You can find additional information about your investment advisory services and request a copy of the relationship summary at 262-238-6980 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/123452>.

Key Questions to Ask Your Financial Professional

- **Who is my primary contact person?**
- **Is he or she a representative of an investment adviser or a broker-dealer?**
- **Who can I talk to if I have concerns about how this person is treating me?**

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Exhibit to Form CRS

The Milwaukee Company is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS, implemented on March 21, 2024:

- We updated the *what investment services and advice can you provide me* section to include financial planning services.
- We updated the *investment offerings* section to include the following disclosure:

We primarily recommend index-based exchange-traded funds, and one of our strategies invests primarily in individual stocks. We are not limited to any single type of security.

- We updated the *what are your legal obligations to me when acting as my investment adviser; how else does your firm make money and what conflicts of interest do you have* to include the following disclosure:

We advise two exchange-traded funds, The Brinsmere Fund – Growth ETF and The Brinsmere Fund – Conservative ETF, and receive a management fee from each. We may invest part of your account in these Funds where appropriate for you. Our advisory fee is not reduced by that management fee, so those assets bear both fees, giving us an incentive to use Funds we advise.

- We updated the *how do your financial professionals make money* section to include the following disclosure:

Compensation may also reflect the profitability of the exchange-traded funds we advise, creating an incentive to invest client assets in those Funds.