PART 2A OF FORM ADV: **FIRM BROCHURE**

1024 East Grand River Avenue

Ste B

Brighton, Michigan 48116

Office: 1-810-588-6178

Fax: 1-810-227-2558

www.asmarterwaytoinvest.com

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This brochure provides information about the qualifications and business practices of A Smarter Way To Invest, Inc. also referred to as “ASWTI” or “Firm”. If you have any questions about the contents of this brochure, please contact us at 1-810-588-6178 or by email at info@asmarterwaytoinvest.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Using the term “Registered Investment Advisor” does not imply a certain level of skill or training.

Additional information about A Smarter Way To Invest, Inc. is available on the SEC’s website at www.adviserinfo.sec.gov. You can search this site for more information about our Firm by using a unique identifying number, known as a CRD number. Our Firm's CRD number is 166170.

Item 2 - Material Changes

This brochure was reviewed and updated on March 27th, 2025, and serves as an update to the previous brochure dated September 2024. At times, we may perform routine checks for grammar, punctuation, etc. and make necessary updates. Additionally, we may make updates within certain sections of this brochure for better clarity. These types of changes would not be considered a material change. Below is/are the summary of changes for this release since the last annual amendment in February 2024:

- Non-material changes include the update to the assets under management total, the change of TD Ameritrade name to Charles Schwab Corporation “Schwab” after their merger was complete, and reverting CCO responsibility back to Ron J. Briggs, Jr. There are no material changes since our previous brochure dated February 2024.

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Item 4 - Advisory Business

A. Description of Firm

With 41 years of financial services experience, Ronald J. Briggs Jr. FIC, CRPC® launched A Smarter Way to Invest, Inc. (from herein referred to as "ASWTI" or Smarter Way "SW"), hereafter referred to as the "Firm", and was approved as a Registered Investment Advisory Firm with the State of Michigan on November 29 of 2012 and became a registered investment adviser with the SEC as of June 26, 2017.

ASWTI offers RIA Client(s) access to ASWTI's various services, including but not limited to proprietary dynamic and actively managed investment models & allocations (herein referred to as "models", "Smarter Way Strategies" or "SWS") that can be combined to create custom Client portfolios, whereby Registered Investment Advisor Firm(s) (from herein referred to as "RIA") and their Investment Advisor Representatives (from herein referred to as "IAR") may utilize the SWS to help assist with their Client's asset management needs in accordance with their goals, objectives, and risk tolerance.

B. Types of Advisory Services Offered

ASWTI does not provide direct to consumer Advisory Services and strictly provides investment advisory services under the following arrangements:

ASWTI is a Third-Party Investment Advisor (herein referred to as a "TPIA") where its services are retained by the RIA, at an institutional level only, and may be engaged through a variety of relationship and service structures, including full Turnkey Asset Management Program "TAMP" services, Sub-Advisory Separately Managed Account "SMA" services, or Signal Provider services. Additionally, the ASWTI Portfolio Management Team may engage outside consultants, sub-advisors, and other Third-Party Portfolio Managers to best achieve and deliver an array of robust SWS to its institutional and RIA Client(s). The TAMP and SMA programs can be managed on Charles Schwab & Co. Inc.'s (hereinafter referred to as "Schwab") custodial platform.

ASWTI acts solely as the TPIA for the RIA, thereby individual Client(s) cannot hire ASWTI to manage their assets directly. Before enlisting any of ASWTI's services, the interested RIA is required to enter into one or more agreements with ASWTI. ASWTI will work with RIA's IARs that will administer various advisory services directly to their Client(s). The IAR responsibilities may include the recommendation of a TPIA, such as ASWTI, for the sole purpose of investment management services for the IAR's Client's portfolio. This arrangement between ASWTI and the RIA is set forth in the terms and conditions of the agreement whereas ASWTI renders its services solely as a TPIA (collectively the "Agreement").

The RIA will hire ASWTI to invest Client(s) assets in one or more of the pre-built traditional equity or ETF models, allocations, or a combination thereof. ASWTI provides unique autonomy for RIA Firms to engage its services including the ability for unique custom development and white labeling of its models and allocations. Services offered by ASWTI provided to such Client(s), using its SWS, may pay a higher or lower fee than using comparable (if available) TPIA services or if a Client(s) solely purchases individual securities without the use of any TPIA.

Institutional Distribution Services:

Recognized as a Manager of Managers, ASWTI may distribute investment management services of other TPIAs and/or Sub-Advisors to RIAs alongside ASWTI's SWS. In consideration of but not limited to: ASWTI's research, due-diligence, and ongoing oversite of its distribution services, ASWTI receives compensation based on assets which it or its Sub-Advisor manages. The nature of ASWTI's payment for such services is described in Item 5. Fees and Compensation.

C. Individual Services

Investment management of accounts using AWSTI's SWS are offered to Client(s) of RIAs. In each case, the RIAs will properly establish a relationship between ASWTI and each Client(s) according to the policies

and procedures associated with either the TAMP or SMA structure between ASWTI and RIAs. No Client relationship with ASWTI shall be established when an RIA is receiving Signal Provider Services and utilizing trade notices for implementing its own portfolio management strategies directly with its Clients.

In every case, the RIAs have the sole direct contact with their Client(s). Once the RIAs have determined an investment strategy that is appropriate for its Client, the IAR may select among ASWTI's SWS for investment. The RIAs advise its Client(s) concerning the allocation of his or her portfolio among ASWTI's SWS along with direction to reallocate funds to different models, if necessary. For example, the RIAs could advise the Client(s) to aggregate one or more pre-built SWS or to blend Models to create a custom allocation. In each circumstance, no such advice is provided by ASWTI to the RIA's Client. All of ASWTI's communications are directed through the RIAs and, unless specifically requested, AWSTI does not have direct communications with the RIA's Client(s). ASWTI may communicate with RIAs Client(s) in a generic manner with monthly or quarterly newsletters and/or periodic market & economic updates.

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

Once the investment decisions concerning the Client(s) allocation among the SWS has been completed by the Client's IAR, ASWTI will process the provided investment direction typically under a managed account arrangement at the Custodian on a discretionary basis according to its discipline for each SWS. The products utilized in effectuating the SWS may include but are not limited to: various exchange-traded funds (ETF)'s, leveraged ETF's, common stock, preferred stock, Structured Notes, Private Equity funds, Reg D securities, MLPs, BDCs, and REITs.

Client(s) will acknowledge and grant ASWTI full discretion over the Client(s) assets as to be managed accordingly by ASWTI. Additionally, the Client(s) also has full authority to revoke full discretion and/or terminate all services provided by ASWTI at any time by contacting their IAR. The IAR will contact ASWTI and convey the direction of the Client. Such discretion may include authority to reinvest dividends or authority to manage distributions for the Client(s) as directed. Such discretionary authority, however, is otherwise limited to the purchases and/or sales of securities within the SWS managed by ASWTI.

ASWTI will not be obligated to act or offer any advice involving legal action on behalf of the Client(s) with respect to securities or other investments held in the account(s), or the issuers thereof, which become the subject of legal notices or proceedings, including bankruptcies. ASWTI is not authorized to withdraw or transfer any money, securities, or property out of the Client's account(s), whether in the name of the Client(s) or otherwise. Only the RIA or it's IAR, with permission from the Client(s), can affect such transactions. ASWTI cannot and will not ever take custody of the Client's funds, securities, or accounts.

Separately Managed Account (SMA):

ASWTI's Separately Managed Account ("SMA") platform provides access for RIAs to utilize ASWTI's SWS, as well as other outside TPIA sub-advisor models as part of ASWTIs institutional distribution services. The ASWTI SMA enables advisors to select at their own discretion ASWTI SWS as an investment vehicle to match their Clients' financial needs, goals, objectives, and risk tolerance.

When using the SMA structure, ASWTI traditionally receives an investment management fee based on the certain types of SWS chosen to be used by the RIA and/or total assets under management allocated

to ASWTI by the RIAs. These fees are set forth by ASWTI in the SMA Sub-Advisory Investment Management Agreement with the RIA. See Item 5 Fees and Compensation for further details.

Turnkey Asset Management Program (TAMP):

When using ASWTI's TAMP services, in addition to the investment management services and access to ASWTI's SWS, ASWTI shall provide additional RIA supporting duties which may include but are not limited to: Client account performance reporting, Client fee billing, account opening and/or administrative services, software and technology access, training and/or education of investment models, allocations, and strategies, use of risk analysis software or tools (for determination of Client's financial risk tolerance), portfolio analysis, unique Client strategy case design, and answering or addressing general questions, comments, and concerns for the RIA's, IARs, or their Client(s). TAMP fees include ASWTI services and the sponsoring RIA's advisory services, the fees are customarily included in a Wrap Fee Program which are made available to the Client(s) and sponsored by the RIA.

In consideration of all services provided to RIA, IAR, and their Client(s), ASWTI will receive a portion of this wrap fee as compensation, as outlined in the TAMP Agreement set forth with the RIA. See Item 5 Fees and Compensation for further details.

Signal Provider Services

ASWTI provides RIAs with the ability access and license trade signals relating to ASWTI's SWS and the respective investment decisions effectuated by ASWTI in each SWS, including the individual securities selected and target security weightings of the respective SWS, whereby RIA will offer and implement investment portfolio management directly to its Clients. These services are strictly limited to receiving ASWTI's distribution of trade notices for particular SWS, and the RIA and its IARs retain the sole discretionary authority over (and have the sole responsibility and discretion for) executing or not executing these trade signals for their Clients. ASWTI does not control, supervise, or monitor the investment of any RIA Client accounts under a Signal Provider arrangement, and no Client relationship is established between RIA Client and ASWTI. Additionally, ASWTI does not affect trades or execute any transactions at any custodians under a Signal Provider relationship. RIA retains the sole responsibility for delivering investment portfolio management services to their Clients, and retains the sole discretion for implementing, and/or alternatively, not implementing, any trade signals provided by ASWTI. Performance of any investment strategies offered by RIAs that rely on ASWTI signals will inherently differ from those of the corresponding ASWTI SWS. As RIA is solely responsible for effecting trades and transactions at their discretion, the execution date and time (and therefore corresponding security price) will differ from that achieved by ASWTI SWS. This arrangement between ASWTI and the RIA is set forth in the terms and conditions of the signal provider agreement whereas ASWTI renders its services solely as signal provider. For details on fees charged for Signal Provider services, see Item 5 Fees and Compensation.

Retirement Plans services:

ASWTI makes available TPIA services to RIAs working with qualified retirement plan sponsors and their plan assets. These services may include a proprietary design of SWS using ETF's or Mutual Funds made available through the custodian administering the retirement plan itself on behalf of the Plan Sponsor and its plan participants. These SWS are specifically designed and weighted with various asset class funds, then managed using a similar methodology and process as provided on the retail side. For further details, please see Item 8 (A) Methods of Analysis/Investment Strategies

ERISA Qualified Plans:

ASWTI is required to provide certain information regarding its services and compensation to assist the Advisor and plan sponsors of those retirement plans that are subject to the requirements of ERISA in assessing the overall structure of their plan and/or the arrangement with ASWTI, including the reasonableness of compensation for services by ASWTI in accordance with the Department of Labor

regulations under Section 408(b)(2) of ERISA. These services and fees are detailed in the agreement at the onset of your relationship with ASWTI.

Wrap Fee Program:

ASWTI does not currently sponsor a wrap fee program but does receive a pre-determined percentage of the Wrap fee from RIAs offering a Wrap Fee Program and using ASWTI's portfolio management services.

D. Assets Under Management

As of December 2024, there are approximately $111,894,148.84 in discretionary assets under management and $ 278,500.00 in non-discretionary assets under management.

These assets are not inclusive of any assets that RIAs may be managing through utilizing our Signal Provider services.

Item 5 - Fees and Compensation

A&B. TPIA Compensation & Fee Deduction

For its portfolio management services, ASWTI is entitled to receive a fee based on assets under management. ASWTI's fee is calculated as described below. In either structure, Turnkey Asset Management Program arrangement ("TAMP") or Separately Managed Account ("SMA"), fees shall be billed either quarterly or monthly, in advance based on the prior quarters or month's ending balance, or in arrears based on the average daily balance during the prior quarter or month, as outlined in the ASWTI TPIA Client Agreement and/or the RIA Investment Management Agreement. ASWTI fees may either be billed separately by ASWTI, included as part of the single advisory fee billed by RIA and subsequently paid to ASWTI by RIA, or included as part of the single advisory fee billed by ASWTI and subsequently paid the advisory portion of the fee to the sponsoring RIA in accordance with the completed forms formalizing the TPIA relationship between the RIA and each of its Client(s) and ASWTI. Whether billed separately by ASWTI or included as part of the RIA advisory fee and subsequently paid to ASWTI by RIA, ASWTI's fees shall be directly deducted by the Custodian from the Client's investment account. AWSTI SWS uses Schwab as its custodial platform. The Client(s) will establish a discretionary trading account with Schwab where Client(s) assets will be held in their name. The Client(s) appoints Schwab as their agent for purposes of calculating and/or executing the TPIA Fee. This form of fee-based billing may be interpreted as a form of indirect or limited custody of Client(s) accounts, which is further described in Item 15 - Custody. AWSTI does not take custody of Clients' assets or securities therein. Further, any and all fee-based billing shall be in accordance with the fee schedules agreed upon by each Client(s) in ASWTI's TPIA Client Agreement and/or the RIA's Investment Management Agreement. Such billing typically occurs within ten (10) business days after the billing period ends (either quarter or monthly). These TPIA fees, whether billed separately by ASWTI or included as part of the RIAs singular advisory fee, are not inclusive of any additional custodial fees or trading expenses, ETF or Mutual Fund internal expense charges, or other step out fees, unless specifically included as part of the RIAs Wrap Fee Program. Certain step out fees, such as ETF and Mutual Fund internal expense charges, are not included as part of a Wrap Fee Program. Please see below for additional information on additional or step-out fees and/or expenses and contact your custodian for further details on specific fees and expenses charged by your Custodian. Comparable services may be available in the broader marketplace, and higher or lower fees for comparable services may be available from other sources.

Turnkey Asset Management Program (TAMP):

ASWTI will participate in a shared percentage of the RIAs Wrap Fee Program, or a shared percentage of the RIAs single advisory fee if Client accounts are set up on a non-wrap account structure with the custodian. The total fee determined by the percentage split is inclusive of both investment management fees, as well as fees for ancillary supporting services provided to the RIA. The percentage split varies with each RIA and is based on a variety of factors such as services required, the complexity of services and/or affiliated services being provided to the RIA by ASWTI, and its back-office support described

above. The Client(s) is made aware of these fees per the RIA's Investment Advisory Agreement, also referred to as Investment Management Agreement and/or ASWTI TPIA Client Agreement.

Separately Managed Accounts (SMA):

For RIAs participating in the ASWTI full access SMA arrangement, the fees shall be as follows:

In accordance with the structure of the SMA between ASWTI and each RIA, the fees for the SMA will either be paid by the RIA on behalf of their Client(s) or be paid directly by the Custodian for assets under management. The maximum fee structure charged for SMA sub-advisory services is 1.00% and may vary depending on a variety of factors and considerations, including but not limited to, level of service needs of the RIA or Client, total AUM of Client, and/or total AUM committed to ASWTI for services by RIA. Fees are negotiable. The responsibility for such payment shall be determined by the completed forms formalizing the relationship between each RIA and ASWTI. It is the sole and complete authority of ASWTI to determine the appropriateness and applicability of negotiating the SMA fee structure. The SMA management fees charged by ASWTI are not inclusive of underlying ETF charges, fund fees, advisory fees, custodial fees, or affiliated fees thereof.

Signal Provider Services:

For RIAs participating in the ASWTI Signal Provider Services, the fees shall be as follows:

In accordance with the structure of the Signal Provider Services Agreement between ASWTI and each RIA, the fees for the Signal Provider Services are charged to and will be paid directly by RIA. These fees are traditionally charged as either a flat monthly or quarterly rate, or charged as a basis point of the total RIA AUM anticipated to utilize and be influenced by the signals, subject to a base minimum annual fee amount. These signal provider fees are negotiable, and may vary depending on a variety of factors, including but not limited to the specific signals selected to be received and level of analysis required for the particular signal, number of Client accounts and/or total AUM of RIA utilizing or expected to be influenced by the signal, level of customization in signal requested by RIA, etc.

Retirement Plan Asset Management Services:

ASWTI will participate in a shared percentage of the RIAs Wrap Fee Program, if a single wrap advisory fee is assessed to the Retirement Plan. Otherwise, ASWTI's maximum fee structure charged for TPIA services, as described above in Item 4. Section D above, is 1.00%. ASWTI's TPIA fee, in either scenario, whether charged separately or determined as a percentage of the RIAs Wrap Fee Program, may vary depending on a variety of factors and considerations, including but not limited to, level of services needs of the RIA or Retirement Plan, total AUM of the Retirement Plan, level of administrative assistance requested/required, etc. These fees are regardless of plan assets or type. The Client(s) is made aware of these fees per the RIA's Investment Advisory Agreement, also referred to as Investment Management Agreement, or Plan disclosure documents provided by the RIA and/or it's IAR working with the plan sponsor.

Additional or Step-out fees and/or Expenses:

There are certain fees assessed by the Custodian regardless of the fee structure types charged by RIA. Please carefully review your agreement with the Custodian to better understand these custodial and/or regulatory fees and other fees that they may charge for various services, if applicable. The RIA, IAR, and ASWTI do not receive any compensation from these additional fees. These fees will either be charged directly by the Custodian or debited to the RIA, in which case the RIA may choose to bill the Client(s) separately for reimbursement based on the RIA IMA and billing policies.

Any charges of underlying holdings, such as those for ETFs or other securities utilized by ASWTI may be found in the corresponding prospectuses made available to each Client(s). These fees would be in addition to and separate from the ASWTI Management Fees described herein. Client(s) may reach out

to their IAR or custodian for further details on any of these additional or step-out fees that may be applicable.

In addition to the annual ASWTI investment management fee, for any non-affiliated RIA Firms, ASWTI charges an annual technology fee of $35 per open account utilizing ASWTI TAMP or SMA services, billed quarterly in arrears. An account is considered open at the time the account is linked between custodian and ASWTI technology system, regardless of account value or trading status. This technology fee is not prorated and is billed on all accounts open as of the last day of the prior quarter. Upon termination of ASWTI services for a Client's account, no prorated adjustments or refunds are provided. RIA may elect, at their discretion, to pay the aggregated technology fees on behalf of their Client(s) directly to ASWTI. ASWTI may choose, at its sole discretion, to waive this annual technology fee on a per account or per RIA basis.

Termination and Pro-rated Fees:

The TPIA contract between ASWTI and the RIA may be modified from time to time as may be mutually agreed upon in writing. The TPIA contract may be terminated by either party, with or without cause, at any time by giving the other party written or email notice of termination no less than thirty (30) days prior to the date of termination. Additionally, the Client(s) may with or without cause, terminate TPIA services being rendered by ASWTI in their account by advance written notice of at least ten (10) business days, either directly to ASWTI or through the RIA's IAR.

Upon ASWTI notification of termination by either the Client(s) and/or the RIA's, and even in the event ASWTI is not properly notified of termination, ASWTI reserves the right to unsubscribe and liquidate the proprietary SWS from Client's account(s) prior to any transition of the Client account(s). If Client has paid fees "in-advance" ASWTI will refund pro-rated management fees based on the number of days between termination date and the end of the month/quarter (depending on billing frequency determined in Client Agreement). ASWTI will refund to Schwab (for deposit into the Client's account) a pro-rata portion of the fees paid to ASWTI for the calendar month or quarter in which such termination occurs. If unable to submit the refund to Schwab, ASWTI will mail a check to the Client for the refund amount to the last known address on file for the Client. If Client pays fees "in arrears", ASWTI will assess a pro-rated final fee for the accounts terminated during the month/quarter. If ASWTI is unable to bill this final pro-rated fee through the custodial platform, ASWTI shall mail the Client(s) a final invoice to the last known address on file for the Client.

The refund amount (if applicable based on "in-advance" billing process) will be calculated as follows:

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

The Client(s) may incur additional fees as a result of any such termination from Schwab, such as, account closing fees, liquidation fees and other fees or charges which may be described in the agreement with Schwab. The RIA, IAR, and ASWTI do not receive any compensation from these additional fees.

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

ASWTI fees charged are calculated as described in Item 5 and are not charged on the basis of a share of capital gains or capital appreciation of the funds, or Models, or any portion of the Models or funds in a Client's account. (known as a performance-based fee).

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

Item 7 - Types of Clients

ASWTI's Client(s) are Client(s) of the RIA. Such Client(s) of the RIA(s) may include individuals, families, businesses, trusts, retirement plans and estates with traditionally a $250,000.00 minimum account size.

ASWTI, in its sole discretion, may accept and/or offer Client(s) through the RIA SWS designed for smaller portfolios.

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

ASWTI and its Sub-Advisors currently manage various models and allocations allowing for a RIA's Client(s) to be diversified over various asset classes and risk tolerances.

A. Methods of Analysis

Investing in securities involves risk of loss which Client(s) should be prepared to bear. No amount of analysis or diversification can wholly account for or eliminate market volatility and systematic risk. Portfolio Models may be subject to many methods of analysis by ASWTI including those described herein.

Generally, our proprietary models are primarily comprised of individual securities and/or ETFs that trade on the NYSE and/or NASDAQ. Our analysis and methodology of choosing these individual securities, while proprietary in nature, is comprised of both fundamental and technical analysis among other factors. ASWTI determines the type and amount/shares of each security within each individual model's objective. The decision comes down to the fundamentals of each security analyzed along with an appraisal of recent price and volume trends, etc. The primary risk in using technical analysis is that spotting historical trends may not help to predict such trends in the future. Even if the trend will eventually reoccur, there is no guarantee that ASWTI will be able to accurately predict such a re-occurrence. The primary risk in fundamental analysis is that the balance sheet and income statement data used may change, in some cases abruptly. Additionally, securities deemed to meet the fundamental requirement for inclusion to portfolios may not result in positive performance for investors and therefore could result in loss of invested capital.

ASWTI's current models which may change from time to time are broken down among the following asset classes and are traditionally strategically allocated between Core Allocations and Satellite positions across many asset and sub-asset classes. Which may change from time to time whereby ASWTI may add or delete available Models and/or Allocations at its sole discretion. ASWTI will notify RIA, IARs of such changes or modifications accordingly.

(6) Equity Models

(1) Tactical Equity Model

(1) Fixed Income Model

(1) Alternative Assets Model

(6) Dynamic Growth Allocations

(3) Blended Asset Allocations

ASWTI will invest in individual securities, ETFs and/or other alternative asset classes and vehicles along with strategically weighting of these securities accordingly as determined by its analysis, proprietary algorithms, and Model objective(s).

Additionally, to assist in managing downside risk exposure and making investment selections, ASWTI may utilize proprietary and/or third-party provided signals and algorithms. The signals and algorithms are utilized to identify various technical and trend indicator analysis, along with an overall market risk and volatility, and assist in making investment selections and decisions related to SWS. These assessments seek to identify periods of high volatility by studying both technical trends and factors along with economic data of the U.S. economy. These signals and algorithms may be utilized wholly or in part for determining investment holding selections and/or allocation weightings for certain strategies. Based on the results of these assessments and whether certain algorithms are positive or negative, ASWTI may move some or all Model holdings to cash or other asset classes with a lower correlation to equity markets in an attempt

to reduce volatility. Depending upon the severity of the risk signals, ASWTI may seek out opportunities for growth through securities that are less correlated to equity market conditions, such as bonds, REITs, structured notes, commodities, or alternative asset classes. Based on the results of certain signals, ASWTI may adjust certain securities or asset classes and/or their respective weightings in SWS. ASWTI's use of these signals and algorithms may change from time to time and third-party service providers are subject to ongoing review by ASWTI for utility in achieving the objectives of models and strategies. There is no guarantee that the use of these proprietary or third-party services will result in positive performance for investors and therefore could result in loss of invested capital.

Third-Party Portfolio Manager (TPIA) Review:

If utilized by ASWTI, Third-Party Portfolio Managers providing sub-advisory services to ASWTI are reviewed periodically via the receipt of quarterly performance reporting, regular due-diligence calls with Portfolio Manager ("PM"), disclosures, monthly newsletters and updated ADV(s). Furthermore, in accordance with the criteria described below, ASWTI may consider their ongoing utility to represent its services to its RIAs relationships. ASWTI in its ongoing review will emphasize the criteria relating to underlying expenses relative to performance, limitations of strategies, and correlations to other Third-Party Portfolio Managers. ASWTI will continually seek to offer RIAs with a premium suite of diversified Portfolio Management offerings and services.

Each Third-Party Portfolio Manager employs their own methods of analysis in providing sub advisory services; each Third-Party Portfolio Manager's specific methods of analysis may be found in their Form ADV 2 Brochure or Prospectus which is made available to our Client(s) via our website www.asmarterwaytoinvest.com or in a paper version if requested. Criteria reviewed by ASWTI if other TPIAs are utilized.

Investment Strategy:

Analyze the type and correlation of investment strategy each TPIA provides, determining whether their strategy is an effective vehicle to achieve particular investment objectives and if the strategy is within the broad risk tolerances of our RIA's Client(s).

Performance History:

Evaluate and monitor the relative and absolute Model performance history compared to strategy back-testing of each prospective TPIA's real performance during various market conditions. For consideration, ASWTI will only work with TPIA's with established portfolio management experience.

Investment Cost:

Examine the cost of underlying holdings, where applicable, in order to determine if a given TPIA has any conflicts of interest or if a TPIA has an excessively expensive strategy. ASWTI evaluates opportunities to minimize any expense which cannot be reimbursed such as ETF and mutual fund expenses.

Total Assets Under Management:

Evaluate the level of assets managed by each TPIA and within each strategy offered by each TPIA. This is to determine the long-term viability and limitations of each strategy which may arise from either insufficient capital or excess capital being associated with each strategy.

B. Investment Strategy:

ASWTI offers a variety of proprietary focused investment models and blended asset allocations (referred to as "Smarter Way Strategies" or "SWS"), each with a unique defined investment objective and methodology to which the strategy is managed. The SWS range in both the degree of active management style as well as the degree of diversification and risk mitigation, providing RIAs with a robust variety of investment portfolio offerings to fit the needs, goals, objectives, and risk tolerance of their Clients. ASWTI employs a data driven, systematic investment process to each of its SWS, with an underlying formulaic security selection process applied to each of the underlying focused asset class investment models.

Diversification:

ASWTI offers a variety of non-diversified "Strategic" investment models that seek to earn a return above their respective benchmarks. These Focused SWS, while actively managed, typically will stay fully invested in the particular asset class and/or market sector, in accordance with and as specified in the Focused SWS' stated objective and methodology. ASWTI also offers several diversified blended asset allocations, which seek to provide a superior risk-adjusted return compared to their respective blended benchmark of the equivalent risk category. The blended asset allocations incorporate several asset classes to create a more diversified portfolio and enhanced risk mitigation than the non-diversified "Strategic" models, such as equities, fixed income, and alternative asset classes. These diversified asset allocations are typically offered in three (3) risk categories, ranging from low risk profile ("Defensive") to high risk profile ("Aggressive" or "Enhanced"). These diversified blended asset allocations are offered in both dynamically managed and static management styles.

Active Management:

ASWTI employs various degrees of active management to its SWS, based on its respective objective and methodology, ranging from a semi-passive "static" approach to dynamically managed risk mitigation approaches according to market conditions. Typically, the actively managed focused model SWS' experience trades and rebalances ranging from a semi-annual basis up to a monthly basis. ASWTI's dynamically managed SWS, which are strategically adjusted between being more "risk-on" and/or "risk-off" depending on market conditions, may experience more frequent trades and rebalances depending on a variety of factors incorporated into the systematic management methodology, including but not limited to: market and economic conditions, ASWTI's fundamental and technical analysis, and the propriety and/or third-party signals and algorithms. ASWTI's Static blended asset allocation offerings are considered semi-passive, as they are modified and rebalanced no more frequently than annually as their objective is to minimize taxes and transaction costs.

Leveraged Strategies:

ASWTI offers a series of dynamically managed SWS that incorporate the use of leveraged ETFs for a portion of the portfolio. These strategies are primarily invested in equity securities, with a portion of the strategy that dynamically moves between "risk-off" asset classes when market conditions are unfavorable, such as cash and/or short-term treasury bills or money market funds, and "risk-on" leveraged equity ETFs when market conditions are favorable. These strategies are designed for sophisticated investors with a very high risk tolerance. ASWTI utilizes the 2x NASDAQ-100 ETF (QLD) in its 2x leveraged SWS, and the 3x NASDAQ-100 ETF (TQQQ) in its 3x leveraged SWS. Leveraged ETFs seek to deliver multiples of the performance of the underlying security or benchmark they track, such as an individual stock or an equity index. For example, a 2x leveraged NASDAQ-100 ETF seeks to deliver twice the investment return of the NASDAQ-100 index. This also means that this ETF will 2% for every 1% loss in the index. To accomplish its investment objectives, leveraged ETFs may utilize a range of underlying investment strategies, including but not limited to the use of short-selling, swaps, futures contracts, options contracts, and other derivative instruments. Most leveraged ETFs are designed to achieve their investment objective on a daily basis, and thus "reset" daily. This means that the time-horizon of the leveraged ETFs investment objective is one (1) day, and its performance over longer periods of time may differ significantly from the performance of the underlying security or index that it tracks during the same time period. ASWTI typically holds these leveraged ETF positions for a longer time period than the stated objective, however applies a dynamic management approach based on both fundamental and technical market analysis and market signals and algorithms to eliminate exposure to these leveraged ETF positions when market conditions are unfavorable. RIAs and their Clients must ensure they have read, understand, and considered the stated investment objectives, principal investment strategies, risks, and costs associated with any leveraged ETFs utilized by ASWTI before utilizing any of ASWTIs leveraged SWS.

C. Types of Investment Risk

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

- Interest Rate Risk
- Geopolitical Risk
- Regulatory Risk
- Civil or Criminal Action Risk
- Liquidity Risk
- Manager Error
- Business Cycle Risk
- Political Risk
- Default Risk
- Macroeconomic Risk
- Systematic Risk
- Risk of Loss of Principal
- Other Nonsystematic Risks

D. Material Risk

Past performance is not a guarantee, or an implied guarantee, of any future results. Current performance may vary from the past performance history. ASWTI, it's Sub-Advisors and/or outside TPIA's when introducing New Models, Allocations and Strategies may use back-testing to provide some hypothetical performance history over various market conditions and time periods. Back-tested model performance should not be relied upon for future performance or model results. Investment returns and principal value will fluctuate in various market conditions or Black-Swan events and may not provide the expected results and any performance reports of any type of investment security. There is no guarantee that any investment model or strategy will achieve its stated investment objectives. All investments are subject to the risks listed above, including the possible loss of the principal amount invested. Investments are not FDIC insured, may lose value, and have no bank guarantees.

Backtested Performance History:

ASWTI, and/or its Sub-Advisors and/or outside TPIA's, when introducing SWS to RIAs and their Clients, may use back-testing to provide some hypothetical performance history to represent what the SWS may have reasonably performed over various market conditions and time periods for which the SWS was not actually available as an offering. Back-tested performance is achieved by the retroactive application of a model investment methodology. Backtested performance results have certain limitations such as being designed with the benefit of hindsight and allows the security selection methodology to be adjusted until past returns are maximized. The results from the back-tested performance period reflect performance of a strategy not historically offered to investors and do not represent returns that any investor actually attained. Backtested results may under- or over-compensate for the impact, if any, that material economic and market factors may have had on the decision-making process ASWTI, or the RIA and its IAR's decision-making when managing a Client's assets. General assumptions of back-tested returns include: dividends and other income are reinvested; trades are executed based on end-of-day security pricing; ASWTI would have been able to purchase the securities recommended by the models and the markets were sufficiently liquid to permit all trading. Changes in these assumptions may have a material impact on any presented back-tested returns. Certain assumptions have been made for modeling purposes and are likely to differ from actual circumstances. No representations and warranties are made as to the reasonableness of the assumptions Back-tested model performance should not be relied upon for future performance or model results.

Hypothetical Performance History:

Performance results are considered hypothetical if the results were not actually achieved by any specific investor or client portfolio and do not reflect trading in actual accounts. ASWTI, and/or its Sub-Advisors and/or outside TPIAs, when introducing SWS to RIAs and their Clients, may present hypothetical performance history in order to demonstrate the approximate performance history of the particular SWS. Hypothetical performance is not an indicator of future or actual results and is not a guarantee or implied guarantee of future performance, returns, profit, or growth. Actual performance achieved by a Client may differ significantly from hypothetical performance as a result of client specific circumstances, including

but not limited to: deposits and withdrawals, legacy positions and excluded holdings, account size, or cash reserves. General assumptions of hypothetical returns include: dividends and other income are reinvested; trades are executed based on end-of-day security pricing; ASWTI would have been able to purchase the securities recommended by the models and the markets were sufficiently liquid to permit all trading. Changes in these assumptions may have a material impact on any presented hypothetical returns. Certain assumptions have been made for modeling purposes and are likely to differ from actual circumstances. No representations and warranties are made as to the reasonableness of the assumptions

Leveraged ETFs:

ASWTI utilizes leveraged equity ETFs in certain of its dynamically managed leveraged SWS, which carry an additional degree of risk beyond traditional equity securities and ETFs. Leveraged ETFs may use complex underlying investment strategies and products in order to meet their stated investment objectives, such as short-selling, swaps, futures contracts, options contracts, or other derivative instruments, which can expose the ETF to the excess risks associated with using those complex investment strategies and products. Additionally, most leveraged ETFs are designed to achieve their investment objective on a daily basis, and thus "reset" daily. This means that the time-horizon of the leveraged ETFs investment objective is one (1) day, and its performance over longer periods of time may differ significantly from the performance of the underlying security or index that it tracks during the same time period. RIAs and Clients seeking to invest in one of ASWTIs leveraged SWS must ensure they have read and understand the leveraged ETF prospectus, including the stated investment objectives, principal investment strategies, risks, and costs associated with the leveraged ETF. To mitigate the risks associated with the use of leveraged ETFs, ASWTI has applied the following safeguards:

A. ASWTI only utilizes leveraged ETFs tied to broad, well-known equity indices, to mitigate concentrated exposure to any single security.

B. ASWTI limits the proportion of the SWS exposed to any leveraged ETF to a maximum of 30% of the total SWS holdings.

C. ASWTI has provided thorough disclosure of the use of leveraged ETFs as well as their associated risks in all materials relating to any SWS that utilizes leveraged ETFs, as well as thoroughly disclosed their risks in this ADV brochure

D. ASWTI recommends, broadly, that RIAs utilize these leveraged strategies only for sophisticated Clients with a very high risk tolerance and needs, goals, and objectives that align with the leveraged SWS objectives.

Item 9 - Disciplinary Information

There is no material disciplinary information to disclose in this section.

Item 10 - Other Financial Industry Activities and Affiliations

ASWTI is required to disclose any relationship or arrangement that is material to its portfolio managed business, RIAs, and/or to its Client(s) with certain related persons.

A. Broker-Dealer Affiliation

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

B. Commodity Affiliation

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

C. Relationship/Conflicts

Ronald J. Briggs, Jr., FIC, CRPC® is the Founder of ASWTI, Chief Executive Officer and Chief Investment Strategist.

Ronald J. Briggs Jr., FIC, CRPC® is the Founder, Principal, and an Investment Advisor Representative for Caitlin John, LLC ("CJ"). CJ is a SEC Registered Investment Advisor Firm. CJ offers financial planning and investment advisory services. CJ utilizes ASWTI as a TPIA for its Client's investments. To mitigate any conflict of interest, IARs of CJ are allowed to offer their Clients' money management services not only through AWSTI but among other TPIAs available on Schwab's platform. IARs are not under any obligation to introduce their Client(s) to ASWTI and may use other methods of managing their Clients' assets accordingly to best achieve the goals, objectives, and risk tolerance of their Client(s).

All Services and Support Persons of the Firm are employed through a single management company called Entry Point Advisor Network ("EPAN"). EPAN is owned under common control by Kristin Briggs, spouse of Ronald J. Briggs, Jr. EPAN employs portfolio management team members and operations personnel to direct ASWTI SWS and support all operations activities of ASWTI. These portfolio management team members and operations personnel are W-2 employees and receive compensation in the form of a salary. Part of this compensation may reflect compensation based on the total AUM of the Firm and RIAs/IARs they support.

D. Advisor Recommendations

ASWTI does not currently recommend or select other investment advisors for their RIA Client(s), but upon request would research and engage outside TPIA's and Sub-Advisors to be added to ASWTI's overall diversified offerings to its RIA Client(s).

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

A. Code of Ethics

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

ASWTI has aligned itself with a code of ethics that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("Code of Ethics"). In accordance with Section 204A of the Investment Advisers Act of 1940 (the "Advisers Act"), its Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by ASWTI or any of its associated persons. The Code of Ethics also requires that certain of ASWTI's personnel (called "Access Persons") report their personal securities holdings and transactions to the firm.

ASWTI's Portfolio Managers taking any investment actions, shall exercise diligence and thoroughness, and shall have a reasonable basis for any such action. Portfolio Managers will disclose personal trading through the quarterly holdings report or linking their personal brokerage accounts to firm's trade monitoring software. They will also be subject to existing supervisory procedures of ASWTI. A copy of the Code of Ethics will be provided to a Client(s) or a prospective Client(s) upon request.

ASWTI, its officers, directors, Access Persons, or other Firm personnel, shall not disclose any non-public information relating to a Client(s) account's portfolio or transactions of ASWTI. Nor shall any officers, directors, Access Persons, or other Firm personnel disclose any non-public information relating to the business or operations of ASWTI unless properly authorized to do so.

ASWTI, its officers, directors, Access Persons, or other Firm personnel may purchase the same or similar securities at the same time as it affects transactions for other Client(s). A conflict of interest could arrive should ASWTI or the persons listed above trade before other ASWTI Client(s). ASWTI has written policies and procedures to address this conflict of interest. At no time, will ASWTI or any associated person of ASWTI, transact in any security to the detriment of any Client(s). In every situation, Client's needs are considered first.

Item 12 - Brokerage Practices

AWSTI does not recommend Custodial services to any Client(s) of RIAs. AWSTI currently has implemented its TPIA services through Charles Schwab & Co., Inc ("Schwab").

Soft Dollar Benefits

ASWTI has access to research and other technology made available by the Custodians it implements it's TPIA services on. This is considered a soft dollar benefit and must be disclosed. ASTWI currently does not use these Custodial services and pays for its own software through a third-party vendor. Because ASWTI does not use such soft dollar benefits, ASWTI does not have an incentive to select or recommend a particular broker dealer based on interest in receiving such research. The method of how the Client(s) chooses a Custodian is solely the responsibility of the RIAs and their Client(s).

Brokerage for Client Referrals

ASWTI's engages RIAs that use Schwab as their Client's custodians due to existing knowledge and processes that works with ASWTI's business practices. However, ASWTI may work with a RIA where their Client(s) have chosen another custodian other than Schwab after validating that no conflicts of interest exist between ASWTI and the selected custodian.

Brokerage Selection

ASWTI does not recommend any broker-dealers. ASWTI works with RIAs that have an established Client(s) and custodial relationship with Schwab. ASWTI prefers this qualified custodian based on ASWTI's evaluation of the following factors, among others; Reputation, Reporting capabilities, and Execution capabilities.

Aggregate of Client Trades

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

In certain circumstances, ASWTI may, to best serve Client(s), place non-aggregate individual trading orders. Non-Aggregated orders may be placed on an individual Client(s) basis in order to meet Client(s) needs, including, but not limited to, fee billing, client distributions, unusual/extraordinary circumstances, or at the request from a Client(s). Client(s) may incur additional costs by not aggregating their trade orders.

Item 13 - Review of Accounts

SWS managed by ASWTI will be reviewed by the Portfolio Management team of ASWTI on a periodic basis. Reviews may include the following: daily share or investment prices, determining how, or if, price change may affect asset allocation strategies, determining whether specific assets should be maintained, increased or sold.

RIAs, IARs and their client's may go online at any time to https://client.schwab.com to review their portfolio managed by ASWTI. This provides the means for transparency of all daily trades, transactions, and valuations.

ASWTI does not provide reports to Client(s) other than its periodic market & economic updates and monthly or quarterly newsletters. Client(s) may obtain various detailed reports directly from their selected custodian as stated above.

Item 14 - Client Referrals and Other Compensation

ASWTI does not receive compensation from any person, custodian, and/or broker-dealer for Client(s) referrals. ASWTI may employ W-2 employees, 1099 Consultants, Sub-Advisors and other necessary third-party or affiliated relationships in which may receive some or all of their compensation through fixed, variable or performance-based compensation (PBC) or a combination thereof as compensation based on various services, roles and responsibilities and/or assets which they directly or indirectly manage or help grow. ASWTI may benefit based on the negotiated institutional pricing as it relates to the pricing that ASWTI charges to RIAs as stated above in Item 5 – Fees and Compensation. The amount paid by retail Client(s) for such services, are consistent with, but may be found to be higher or lower than the fees which would be paid for the same services without ASWTI's distribution of Sub-Advisor services.

Item 15 - Custody

Client's account assets will be held by Schwab or another approved custodian. ASWTI will not have custody of any securities or assets in the Client's account, but a form of indirect or limited form of custody as it relates to only the authority to deduct ASWTI management fees by Schwab and authorized by the Client(s).

Item 16 - Investment Discretion

Discretionary Authority

ASWTI is granted unlimited discretionary trading authority to supervise all investments managed by ASWTI, as well as affiliate Third-Party Sub-Advisors. ASWTI accepts discretionary authority via a signed investment management agreement and a custodial "Shared Rep Code" between the Client(s) and the RIA to manage securities accounts on behalf of the RIA's Client(s). ASWTI has the authority to determine, without obtaining specific Client(s) consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority allows for the efficient placing of trades for the various SWS managed by ASWTI in Client(s) accounts on the Clients' behalf. Certain Client(s) may put restrictions on their accounts, such as excluding a particular class of securities, retaining a particular security and/or tax consideration. In accounts with such restrictions, performance may be dissimilar to performance of ASWTI's composite performance. Investment restrictions or limitations by a Client(s) should be provided to ASWTI in writing by the RIA or the representing IAR of the Client(s).

Limited Power of Attorney

ASWTI will not be obligated to take action or offer any advice involving legal action on behalf of the Client(s) with respect to securities or other investments held in the account(s), or the issuers thereof, which become the subject of legal notices or proceedings, including bankruptcies. ASWTI is not authorized to withdraw or transfer any money, securities, or property out of the Client(s) account(s), either in the name of the Client(s) or otherwise. ASWTI nor any of its personnel cannot and will not ever take custody of any of the Client's funds or securities except for the deduction of authorized management fees.

Item 17 - Voting Client Securities

ASWTI does not accept authority, take any action or render any advice with respect to voting Client(s) proxies. Client(s) retain the authority to vote proxies and are responsible for ensuring that proxy materials are sent directly to them or the third-party they may assign.

Item 18 - Financial Information

ASWTI does not require or solicit more than $1,200.00 in fees per Client paid more than six (6) months in advance and therefore is not required to provide, and has not provided, a balance sheet.

No financial condition exists that would impair our ability to meet our contractual commitments to our Client(s). ASWTI has not been subject to a bankruptcy petition or proceeding at any time.