

Empower Financial Wealth Management LLC

Form ADV Part 2A - Cover Page

This Disclosure Brochure provides information about the qualifications and business practices of Empower Financial Wealth Management LLC. If you have any questions about the contents of this Disclosure Brochure, contact us at 909-330-1400. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Empower Financial Wealth Management LLC (CRD/IARD # 307768) is available on the SEC's website at www.adviserinfo.sec.gov.

9330 Baseline Rd # 203
Rancho Cucamonga Ca 91701
Phone: 909-330-1400
Fax: 909-330-1403

quincy@empowerfg.com
www.empowerfg.com

February 24, 2020

Empower Financial Wealth Management LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 - Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Initial Filing

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3 - Table of Contents

Form ADV – Part 2A – Firm Brochure

Form ADV Part 2A - Cover Page.....	1
Item 2 - Material Changes	2
Item 3 - Table of Contents	3
Item 4 - Advisory Business.....	4
Item 5- Fees and Compensation	9
401(k) Plan	13
Item 6- Performance-Based Fees and Side-By-Side Management.....	15
Item 7 – Types of Clients	15
Item 8: Methods of Analysis, Investment Strategies and Risk of Investment Loss	15
Item 9: Disciplinary Information	18
Item 10: Other Financial Industry Activities and Affiliations.....	18
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	19
Item 12: Brokerage Practices.....	21
Item 13: Reviews of Accounts.....	21
Item 14: Client Referrals and Other Compensation	22
Item 15: Custody.....	22
Item 16: Discretion.....	23
Item 17: Voting Client Securities (Proxy Voting)	23
Item 18: Financial Information	23
Item 19: Requirements for State Registered Advisers.....	24
Business Continuity Plan	25
Brochure Supplement (Part 2B of Form ADV)	27

Item 4 - Advisory Business

A. Description of the Advisory Firm

Empower Financial Wealth Management LLC (“EFWM”, “us”, “we”, “our”) is a Registered Investment Adviser (“Adviser”) which offers investment advice regarding securities, insurance, and other financial services to clients.

We provide investment advice through Investment Adviser Representatives (“IAR”) associated with us. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on our behalf.

EFWM was founded in 2020 by Quincy Baynes who serves as Chief Compliance Officer and Managing Member. We provide management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, corporations, and small businesses.

We are committed to the principle that by placing the client’s interests first, we will add value to the asset management process and earn the client’s trust and respect. We value long term relationships with our clients whom we regard as strategic partners in our business.

The firm currently reports no discretionary or non-discretionary Assets Under Management.

B. Types of Advisory Services

EFWM offers non-discretionary direct asset management services to advisory Clients. We also offer ongoing financial planning, coaching, and investment advising services based upon the unique goals, financial situation, and risk tolerance of each client. EFWM will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, EFWM will obtain prior Client approval before executing any transactions.

Financial Planning

If financial planning services are applicable, a thorough review of all applicable topics including but not limited to,

- Retirement Planning
- Succession Planning
- Education Planning
- Business Exit Planning
- Cash Flow Analysis
- Major Purchase Planning
- Budget Planning
- Legacy Planning
- Insurance Planning
- Investment Planning
- Major Purchase Planning
- Major Purchase Planning
- Tax Planning
- Personal Financial Planning

If a conflict of interest exists between the interests of EFWM and the interests of the Client, the Client is under no obligation to act upon EFWM’s recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through EFWM.

Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Under CCR Section 260.235.2, it requires that the conflict of interest, which exists between the interests of the investment advisor and the interests of the Client when offering financial planning services, be disclosed.

Financial plans and financial planning may include analysis and recommendations related to: investments; career management; entrepreneurship; life insurance; property and liability insurance; tax implications; budgeting; estate plans; retirement; college funding; debt/credit management; and other considerations related to achieving client goals. These services are based on annual subscriptions, fixed fees, or hourly fees and the final fee structure is documented in the Financial Planning Agreement.

Investment Portfolio Management

For each client, an individual Investment Policy Statement is created based on their personal situation, needs, and objectives. The Investment Policy Statement analyzes the client's goals, assets, liabilities, cash flows, tax implications, risk tolerance, risk capacity, time horizon, and other factors to construct a diversified strategic asset allocation. This becomes the basis for the selection of assets within the client's portfolio(s).

Orion Portfolio Solutions

EFWM may recommend that certain Clients authorize the active nondiscretionary management of a portion of their assets by and/or among certain independent investment manager(s) either directly or through a program sponsored by Orion Portfolio Solutions. The terms and conditions under which the Client shall engage Orion Portfolio Solutions shall be set forth in separate written agreements between (1) the Client and EFWM and (2) the Client and Orion Portfolio Solutions. EFWM shall continue to render advisory services to the Client relative to the ongoing monitoring and review of account performance, for which EFWM shall receive an annual advisory fee which is based upon a percentage of the market value of the assets being managed by Orion Portfolio Solutions. Factors that EFWM shall consider in recommending Orion Portfolio Solutions include the Client's stated investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research. In addition to EFWM's written disclosure statement, the Client shall also receive the written disclosure statement of Orion Portfolio Solutions. Clients should review Orion Portfolio Solutions' ADV Part 2 or Terms of Use for additional details regarding services.

Third-Party Managers

When deemed appropriate for the Client, we may recommend that Clients utilize the services of a Third-Party Manager ("TPM") to manage a portion of, or your entire portfolio. All TPMs that we recommend must either be registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authority.

After gathering information about your financial situation and objectives, an Associated Person of our firm will make recommendations regarding the suitability of a TPM or investment style based on, but not limited to, your financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPM(s), we will monitor the performance of the TPM(s) to ensure their performance and investment style remains aligned with your investment goals and objectives.

In such circumstances, EFWM receives solicitor fees from the TPM. We act as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We help the Client complete the necessary paperwork of the TPM, provides ongoing services to the Client. Ongoing services include but are not limited to:

1. Meet with the Client to discuss any changes in status, objectives, time horizon or suitability;
2. Update the TPM with any changes in Client status which is provided to EFWM by the Client;
3. Review the statements provided by the TPM; and
4. Deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM to the Client.

EFWM will provide the TPM with any changes in Client status as provided to us by the Client and review the quarterly statements provided by the TPM. EFWM will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM. Clients placed with TPM will be billed in accordance with the TPM's Fee Schedule which will be disclosed to the Client prior to signing an agreement. This is detailed in Item 10 of this brochure.

Financial Coaching

Financial coaching is designed to provide clients at the beginning of their financial journey with guidance. Clients without investable assets are provided plans designed to help build their wealth.

Financial Coaching may include analysis and recommendations related to:

- Creating financial goals
- Foundational insurance planning
- Identifying financial problems/risks
- Foundational estate planning
- Cash flow management & budgeting
- Investment and tax education
- Career mentoring
- Debt management

These services are based on annual subscriptions, fixed fees, or hourly fees and the final fee structure is documented in the Financial Planning Agreement.

Erisa Plan Services

EFWM provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. EFWM may act as a 3(21):

Limited Scope ERISA 3(21) Fiduciary. EFWM may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions on a non-discretionary basis. As an investment advisor EFWM has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using EFWM can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide non-discretionary investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal

and addition of investment options. EFWM acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).

- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide non-discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands EFWM’s assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor’s definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, EFWM is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. EFWM will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

EFWM may provide these services or, alternatively, may arrange for the Plan’s other providers to offer these services, as agreed upon between EFWM and Client.

3. EFWM has no responsibility to provide services related to the following types of assets (“Excluded Assets”):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to EFWM on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

Publications, Newsletters and Educational Seminars/Workshops

As part of its service, the firm provides articles and e-mail newsletters on financial literacy and investment education. Additionally, the firm provides financial literacy and investment education seminars and workshops to clients and the public.

C. Client Tailored Services and Client Imposed Restrictions

Financial planning is an inherently personal service and each client's plan is tailored to their specific goals and situation. Recommendations and implementation are determined by the client's individual needs, outlined in the Investment Policy Statement and within the client's other financial plan documents. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. Any restrictions shall be agreed upon by the client and the advisor and will be enumerated in the Investment Policy Statement. However, if the restrictions prevent EFWM from responsibly serving the client in a fiduciary manner, EFWM reserves the right to end the advising relationship.

D. Wrap Fee Programs

EFWM does not participate in any wrap fee programs.

E. Amounts Under Management

EFWM provides investment advising and recommendations but does not manage client investment accounts nor take custody of funds. EFWM currently has \$0 (zero) of assets under management.

F. Conflicts of Interest

A conflict exists between the interests of the investment adviser and the interests of the client. The client is under no obligation to act upon the investment adviser's recommendation, and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

All material conflicts of interest will be disclosed prior to entering into or renewing an advisory agreement. If a material conflict of interest arises during the course of a contract which the firm is aware of, the client shall be notified of the conflict of interest.

Item 5- Fees and Compensation

Asset Management

EFWM Management Fees

EFWM offers non-discretionary direct asset management services to advisory Clients. Pursuant to CCR Section 260.238(j), lower fees for comparable services may be available from other sources. Total fees to Client will never exceed the safe harbor threshold of 3% of assets under management per year. EFWM charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee	Monthly Fee
First \$1,000,000	1.10%	0.0917%
Next \$1,000,001 - \$3,000,000	1.00%	0.0833%
Next \$3,000,001 - \$5,000,000	0.85%	0.0708%
Next \$5,000,001 - \$10,000,000	0.75%	0.0625%
Next \$10,000,001 - \$15,000,000	0.50%	0.0417%
Over \$15,000,000	0.30%	0.0250%

This is a blended fee schedule; the portfolio management fee is calculated by applying different rates to different portions of the portfolio. EFWM may group certain related Client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

For example, a Client with \$10,000,000 under management would pay \$85,500 on an annual basis.

1. First \$1,000,000 x .0110 = \$11,000
2. Next \$2,000,000 x .0100 = \$20,000
3. Next \$2,000,000 x .0085 = \$17,000
4. Next \$5,000,000 x .0075 = \$37,500
5. **Total** **\$85,000**

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed monthly in arrears based on the amount of assets managed as of the close of business on the last business day of each monthly.

Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

For fees that are directly deducted from the account by the custodian:

- EFWM will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on and the time period covered by the fee;

- EFWM will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

Orion Portfolio Solutions

EFWM will charge an advisory fee based on the above schedule for the services we provide. *Orion Portfolio Solutions* does not receive any portion of the advisory fee charged by EFWM. The investment management fees charged by Orion Portfolio Solutions are exclusive of, and in addition to, EFWM's investment advisory fee set forth above. The total annual fees for the Orion Portfolio Solutions Program will not exceed 3% of assets under management. The fees are charged monthly in arrears and are based on the average daily account balance for the period for the prior month.

Fees for Orion Portfolio Solutions services include:

- Administration Fees (reporting and accounting services – ranging from 0.08% - 0.45%),
- Account Maintenance Fees (\$25 or \$50 per account annually), and
- Strategist Fees (range from 0.0% to 0.20%).

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are automatically deducted from the Client's account by Orion Portfolio Solutions; Orion Portfolio Solutions will pay EFWM their portion of the fees. EFWM does not have the ability to directly deduct their advisory fee from the Client account. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation. For accounts closed mid-month, EFWM will be entitled to a pro rata fee for the days service was provided in the final month. Client shall be given Sixty (60) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Third Party Managers

The Pacific Financial Group, Inc.

EFWM has entered into a Solicitor Agreement with PFG. The investment advisory programs available along with the fees for the programs are detailed in the Form ADV Part 2 of PFG.

Managed Strategists Program

PFG's Managed Strategists Program, or, if applicable, Portfolios customized by EFWM, shall in each instance consist solely of the Pacific Financial Group Mutual Funds ("New Pacific Funds"), a group of mutual funds managed by PFG's affiliate, Pacific Financial Group, LLC. For Client assets invested in Managed Portfolios or Customized Portfolios consisting of New Pacific Funds, the Client shall be obligated by the Investment Management Agreement to pay EFWM an annual fee of 0.75%. Fees are paid monthly based on the average daily net asset value.

Gradient Investments, LLC

EFWM has entered into a Solicitor Agreement with Gradient Investments, LLC ("GI"). GI is a Registered Investment Advisor registered with the Securities and Exchange Commission that provides investment portfolio advice and supervisory services.

GI offers an actively managed program of mutual fund and stock portfolios. The fee will be disclosed to the Client in the Investment Advisory Agreement and are negotiable. The Clients fee for these services will be based on a percentage of assets under management as follows:

Fee Schedule per Account for:			
Strategic & Tactical Portfolios			
Assets Valuation	Annual Advisory Fee	Gradient Investments	Introducing Advisor
Up to \$1,000,00	2.00%	1.00%	1.00%
\$1,000,001 - \$2,000,000	1.65%	.80%	.85%
\$2,000,001 - \$3,000,000	1.20%	.60%	.60%
Over \$3,000,000	.95%	.45%	.50%
Fee Schedule per Account for:			
Allocation Portfolios			
Assets Valuation	Annual Advisory Fee	Gradient Investments	Introducing Advisor
Up to \$1,000,00	1.70%	.70%	1.00%
\$1,000,001 - \$2,000,000	1.35%	.60%	.75%
\$2,000,001 - \$3,000,000	1.00%	.50%	.50%
Over \$3,000,000	.80%	.40%	.40%
Fee Schedule per Account for:			
Preservation Portfolios			
Assets Valuation	Annual Advisory Fee	Gradient Investments	Introducing Advisor
All Assets	1.00%	.40%	.60%

*The minimum quarterly fee billed will be \$25

For Client Directed Accounts, GI will assist in the opening, closing and transferring of accounts. GI will provide institutional and 3rd party reports on securities held in the account and investment analysis via email or via phone when requested. GI will liquidate and purchase securities per the Client's request. GI will also provide administrative services per the Client's written request such as: ACH, check writing, RMD servicing. GI will provide consolidated household performance reporting on these accounts which are combined with any GI managed accounts.

The above fees are negotiable. Fees are assessed quarterly in arrears based on the amount of the assets managed as of the end of the previous quarter.

For example: The Quarterly Advisory Fee = (Quarter End Value x Annual Fee %) X (Days in Quarter/Days in Year) + \$15(administrative fee).

All management fees are withdrawn from the Client's account unless otherwise noted. GI will receive written authorization from the Client to deduct advisory fees from their account held by a qualified custodian. GI will pay EFWM their share of the fees. EFWM does not have access to deduct Client fees. Clients may terminate their account within five (5) business days of signing the investment advisory agreement without penalty or obligation. For terminations after the initial five business days,

GI will be entitled to a pro-rata fee for the days service was provided in the final quarter. GI will pay EFWM their portion of the final fee. In addition, GI charges a \$15 service fee quarterly.

Financial Foundation Plans

Plans designed to provide the basic foundation of the financial planning process for clients who are at the beginning of their financial journey. These plans provide analysis and recommendations including:

- Goal setting & prioritization
- Debt analysis
- Cash flow analysis
- Budget optimization situation
- Net worth statement analysis
- Other factors central to the client's

Fees for Foundation Plans are \$800 per plan for single individuals and \$900 for couples. More complex plans may require additional fees based on the number of hours required to responsibly complete the plan. When additional fees apply, the total amount will be disclosed to the client prior to any work being completed. A Financial Planning Agreement including the final fee will be presented to the client prior to any fees being charged. Fees are due 50% upon signing of the Financial Planning Agreement and 50% upon completion of the plan.

Comprehensive Financial Plans

Plans designed to provide a comprehensive look at the client's entire financial situation for clients with more robust planning needs. These plans provide analysis and recommendations of all aspects of financial planning including:

- Goal setting & prioritization
- Tax planning
- Cash flow & net worth analysis
- Estate planning
- Budget optimization
- Retirement planning
- Investment management
- College funding
- Debt management and credit analysis
- Employer benefits planning
- Career mentoring
- Entrepreneurship advising
- Risk analysis & management
- Life, property, liability and other insurance planning
- Other factors central to the client's situation

Fees for comprehensive plans start at \$3,000 per plan for single individuals and \$3,500 for couples. More complex plans may require additional fees based on the number of hours required to responsibly complete the plan. When additional fees apply, the total amount will be disclosed to the client prior to any work being completed. A Financial Planning Agreement including the final fee will be presented to the client prior to any fees being charged. Fees are due 50% upon signing of the Financial Planning Agreement and 50% upon completion of the plan.

Hourly Fees

When clients need more complex planning requiring additional fees (as described above), fees will be charged hourly based upon the time required to complete the plan. In this circumstance, fees will be charged at \$250 per hour. If a client prefers, hourly fees may be charged for all work on specified projects. The fees are negotiable and the final fee schedule will be included in the Financial Planning

Agreement. 50% of the first-month's estimated billing are due in advance with the remainder billed monthly or upon completion of the planning service.

Erisa Plan Services

The annual fees are based on the market value of the Included Assets and will not exceed 3%. The annual fee is negotiable and may be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets).

If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, EFWM shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of EFWM is outlined below

401(k) Plan	
Establishment Fee	
New (Start-Up) Plans	\$500
Existing (Conversion) Plans	\$1,000
Asset management Fee - 0.60% annually or .05% Monthly*	

The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets.

EFWM does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, EFWM will disclose this compensation, the services rendered, and the payer of compensation. EFWM will offset the compensation against the fees agreed upon under the Agreement.

Publications, Newsletters and Educational Seminars/Workshops

We do not charge clients nor the public for articles and email newsletters. These are made available either free to the public or as an included offering exclusively to clients.

Educational seminars and workshop may be provided at no cost or for a fee. When a fee is charged, the fees range from \$50 per person to \$250 per person depending on seminar topic and length. Flat fees per seminar may also be negotiated.

Payment of Fees

Client Payment of Fees

Investment management fees may be billed quarterly in arrears, meaning that we invoice you after the billing period. Fees are usually deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery.

EFWM, in its sole discretion, may charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.).

Clients may also pay monthly subscription fees by check or credit card in quarterly or six-month increments; up to five months in advance and including the fees for the current month's services.

Lower fees for comparable services may be available from other sources.

Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-Party fees from outside vendors required to implement the plan (e.g. attorney fees, tax filing fees, custodian fees, mutual fund fees, transaction fee etc.). Those fees are separate and distinct from the fees and expenses charged by EFWM.

Please see Item 12 of this brochure regarding broker/custodian.

Clients pay the TPM's investment advisory fees. Prior to signing an investment advisory agreement, the method of payment will be disclosed in the TPM's Form ADV Part 2.

Prepayment of Fees

EFWM collects its fees at most 5 months in advance. Initial deposits for planning services are payment for work to be done immediately and over the next one to three months.

Clients may pay their subscription fees in up to six-month increments, including fees due for the current month's services.

Third party management fees may be billed monthly or quarterly in advance.

Fees for ERISA 3(21) services may be billed in advance.

If the Client cancels after five (5) business days, any u

Termination of Agreement and Refunds

Clients may terminate their contracts without penalty and for a full refund within five (5) business days of signing the advisory contract. After the initial termination period, clients may terminate their contract at any time by notifying EFWM in writing and paying the rate for the time spent prior to notification of termination. If the client made an advanced payment, unearned portions of fees will be refunded to the client.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of EFWM receive external compensation sales of investment related products such as insurance as licensed insurance agents. From time to time, they will offer Clients services from those activities. More than 50% of Mr. Baynes' compensation is from external compensation.

This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As an insurance agent, Mr. Baynes does not charge advisory fees on the insurance products he receives a commission on. This conflict is mitigated by disclosures, procedures, and EFWM's fiduciary obligation to place the best interest of the Client first and Clients

are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

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

EFWM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. In our opinion, these performance-based fees unduly enrich the advisor during up markets, and do not cost the advisor anything during down markets. As a result, they may encourage advisors to take on unnecessary risk to maximize the swings between up markets and down markets. We believe these types of fees represent a conflict of interest and do not benefit the client; and as such we do not participate in them.

Item 7 – Types of Clients

EFWM generally provides financial planning and coaching services to the following Types of Clients:

- Entrepreneurs/Business Owners
- Newlyweds and Young Families
- Recent College Graduates
- High net worth individuals
- Individuals,
- Pension and Profit-Sharing Plans,
- Trusts and Estates,
- Charitable Organizations

Client relationships vary in scope and length of service.

Minimum Account Size

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

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

A. Methods of Analysis and Investment Strategies

SFC will evaluate securities based on a fundamental or technical analysis using charts or cyclical studies. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without

other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

TPMs utilized by EFWM may use various methods of analysis to determine the proper strategy for the Client referred and these will be disclosed in the TPM's Form ADV Part 2. Other strategies utilized by TPMs may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

In developing a financial plan for a Client, EFWM's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

B. Material Risks Involved

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with us:

Market Risk: The prices of securities held by mutual funds in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Inflation Risk: When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Management Risk: The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.

Equity Risk: Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

Fixed Income Risk: The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

Investment Companies Risk: When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.

Foreign Securities Risk: Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

Long-term purchases: Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the

investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.

Short-term purchases: Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.

Trading risk: Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.

All investment programs have certain risks that are borne by the investor. The risks associated with utilizing TPM's include:

Manager Risk

TPM fails to execute the stated investment strategy

Business Risk

TPM has financial or regulatory problems

The specific risks associated with the portfolios of the TPM's which is disclosed in the TPM's Form ADV Part 2.

C. Risks of Specific Securities Utilized

All investment securities carry risk including, but not limited to, the ones listed above. EFWM does not use securities which constitute additional risk beyond what is typical. EFWM also regularly reviews news of fraud, scams, and other investment crimes to identify types of investments which may pose an additional risk to clients. Even with diligent oversight and planning, all investing carries risks and clients should be prepared to bear the risk associated with investing.

Item 9: Disciplinary Information

Neither EFWM nor any of its employees have been involved in legal or disciplinary actions related to investing or advising clients. There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities and Affiliations

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

Neither EFWM nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

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

Neither EFWM nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, nor Commodity Trading Advisor.

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

Managing Member Quincy Baynes has a financial affiliated business as an insurance agent as a sole proprietor. More than 50% of his time is spent on these activities. He will offer Clients services from those activities. As an insurance agent, he may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products.

Clients have the option to purchase these products through another insurance agent of their choosing.

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

When referring Clients to a TPM, the Client's best interest will be the main determining factor of EFWM. EFWM ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

Clients placed with TPM will be billed in accordance with the TPM's fee schedule which will be disclosed to the Client prior to signing an agreement.

These practices represent conflicts of interest because EFWM is paid a Solicitor Fee for recommending the TPM and may choose to recommend a particular TPM based on the fee EFWM is to receive. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to act in the best interest of its Clients.

Clients are not required to accept any recommendation of TPM given by EFWM and have the option to receive investment advice through other money managers of their choosing.

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

A. Code of Ethics

The employees of EFWM have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of EFWM employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of EFWM. The Code reflects EFWM and its supervised persons' responsibility to act in the best interest of their Client.

One area the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

EFWM's policy prohibits any person from acting upon or otherwise misusing non -public or inside information. No advisory representative or other employee, officer or director of EFWM may

recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

EFWM's Code is based on the guiding principle that the interests of the Client are our top priority. EFWM's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

EFWM will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Above all, EFWM and its representatives are expected (and legally required) to act as fiduciaries of their clients including operating in a client's best interest; avoiding or fully disclosing any and all conflicts of interest. A copy of the Code of Ethics is available upon request.

B. Recommendations that Persons in this Firm have Material Financial Interests in

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

C. Advisory Personnel Investing Personal Money in the Same Securities as Clients

From time to time, representatives of EFWM may buy or sell securities, including mutual funds or ETFs, for themselves that they also recommend to clients. EFWM will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

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

EFWM does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

However, employees may buy or sell securities at the same time they buy or sell securities for Clients. When this occurs, EFWM will trade client's securities before they trade their own.

In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide EFWM with copies of their brokerage statements.

The Chief Compliance Officer of EFWM is Quincy Baynes. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

Item 12: Brokerage Practices

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

EFWM has a relationship with TD Ameritrade as the third-party custodian for client assets under management. In selecting a third-party custodian, EFWM primary criteria is the safety and security of client assets.

Additional factors used in selecting custodians include the cost to the client; the cost, if any, to EFWM; the breadth of available low-cost investment options; client portal and other client-facing technology; advisor portal and other advisor-facing technology; and the company's ethical history and regulatory record.

EFWM does not take custody of client funds, nor direct client funds within a custodial account, nor direct brokerage of client assets. EFWM develops portfolio analysis and recommendations and provides investment advice, which the client then executes in their own brokerage, retirement, or mutual fund account(s).

1. Research and Other Soft-Dollar Benefits

We receive soft dollar benefits by nature of our relationship with TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. Refer to Item 14 below for a list of services received from TD Ameritrade.

2. Brokerage for Client Referrals

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

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

EFWM does not require management of client investment accounts, and clients are free to choose their own broker-dealer/custodian for their assets.

B. Aggregating (Block) Trading for Multiple Client Accounts

EFWM does not affect trades within client accounts, and therefore does not aggregate trades (or block trade) for multiple client accounts.

Item 13: Reviews of Accounts

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

Client accounts with the Investment Management Service will be reviewed regularly on a quarterly basis by Quincy Baynes, Managing Member and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels.

Events that may trigger a special review would be unusual performance, addition or deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

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

Non-periodic reviews may be triggered by material changes in a client's financial situation including employment, goals, family status; or material changes in the environment including market, economic, or political events.

C. Content and Frequency of Regular Reports Provided to Clients

Clients receive reports related to financial planning services. Frequency is based on the service agreement they purchase. Clients will receive account reports from their broker or custodian.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, EFWM suggests updating at least annually.

Item 14: Client Referrals and Other Compensation

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

EFWM has entered into a Solicitor Agreement with TPGF. For Client assets invested in Managed Portfolios or Customized Portfolios consisting of New Pacific Funds, the Client shall be obligated by the Investment Management Agreement to pay EFWM an annual fee of 0.75%. Fees are paid monthly based on the average daily net asset value.

EFWM has entered into a Solicitor Agreement with Gradient Investments, LLC ("GI"). GI is a Registered Investment Advisor registered with the Securities and Exchange Commission that provides investment portfolio advice and supervisory services. Refer to item 5 for solicitor fee.

EFWM does not receive any economic benefit directly or indirectly from any third party for advice rendered to clients. Clients may engage in professional services from third parties such as attorneys or accountants, and may receive recommendations from EFWM if requested. To avoid conflicts of interest in advice given to clients, no referral fees or other economic benefits are received from third parties referred to clients.

B. Compensation to Non –Advisory Personnel for Client Referrals

EFWM does not compensate for Client referrals.

Item 15: Custody

All asset are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by EFWM.

EFWM is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of EFWM.

EFWM does not accept custody of client funds except in the instance of withdrawing client fees.

For client accounts in which EFWM directly debits their advisory fee:

1. EFWM will send a copy of its invoice to the custodian at the same time that it sends the client a copy.
2. The custodian will send at least quarterly statements to the client showing all disbursements for the account, including the amount of the advisory fee.
3. The client will provide written authorization to EFWM, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains client's investment assets. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities

Item 16: Discretion

EFWM accepts non-discretionary authority to manage securities accounts on behalf of Clients. EFWM will obtain prior Client approval before executing each transaction.

The Client approves the custodian to be used and the commission rates paid to the custodian. EFWM does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Clients are in full control of their accounts, held at third parties, and are solely responsible for the execution of recommendations.

Item 17: Voting Client Securities (Proxy Voting)

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

When assistance on voting proxies is requested, EFWM may provide recommendations to the Client. If a conflict of interest exists, it will be disclosed.

Item 18: Financial Information

A. Balance Sheet

EFWM does not have any financial impairment which could impact clients. EFWM does not require nor accept prepayment of more than \$500 in fees per client, six months or more in advance and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients (If Applicable)

Neither EFWM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years (If Any)

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

Item 19: Requirements for State Registered Advisers

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

EFWM has only one management person/executive officer; Quincy Baynes. Quincy holds a Bachelor of Science in Business with a concentration in Finance. His complete education and business background can be found on the Supplemental ADV Part 2B form.

B. Other Businesses in Which This Advisory Firm Is Engaged

Mr. Quincy Baynes earns income for his writings, speaking engagements, business coaching and as an insurance agent.

World Financial Group (Insurance Agent)

01/11 – Present – Insurance Agent - He will offer Clients services from this business activity. As an insurance agent, he may receive separate yet typical compensation. The business is not investment related but is related to the insurance industry. I spend about 50% of my time on this business.

9330 Baseline Rd. 203 Rancho Cucamonga, CA 91701

Infinite Success Blueprint - "A book on personal development"

11/18-Present – Author - The book is not investment related and I work on it about 5 hours a month, 0 of which is during SEC trading hours.

9330 Baseline Rd. Suite 203, Rancho Cucamonga, CA 91701

Baynes Enterprises (sole proprietorship)

01/18 - Present – Owner - I coach people on how to market their business. I also selling personal development courses along with personal appearance through speaking. I write a blog articles and run this business through the www.buildandscale.com website and brand. This business is not investment related and I work on it about 20 hours a month, 5 of which is during SEC trading hours.

9330 Baseline Rd. 203 Rancho Cucamonga, CA 91701

Baynes Insurance Services (sole proprietorship)

01/20 – Present – Owner/insurance Agent - He will offer Clients services from this business activity. As an insurance agent, he may receive separate yet typical compensation. The business is not investment related but is related to the insurance industry. I spend about 50% of my time on this business.

9330 Baseline Rd. 203 Rancho Cucamonga, CA 91701

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

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

EFWM does not charge performance-based fees.

D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at EFWM has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Neither EFWM nor its management have been involved in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:

- a) An investment or an investment-related business or activity;
- b) Fraud, false statement(s) or omissions;
- c) Theft, embezzlement or other wrongful taking of property;
- d) Bribery, forgery, counterfeiting, or extortion;
- e) Dishonest, unfair or unethical practices.

2. Neither EFWM nor its management have been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- a) An investment or an investment-related business or activity;
- b) Fraud, false statement(s) or omissions;
- c) Theft, embezzlement or other wrongful taking of property;
- d) Bribery, forgery, counterfeiting, or extortion;
- e) Dishonest, unfair or unethical practices.

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

Neither EFWM, nor its management persons, has any relationship or arrangement with issuers of securities.

F. Material Conflicts of Interest Assurance

All material conflicts of interest regarding EFWM, its representatives or any of its employees which could be reasonably expected to impair the rendering of unbiased and objective advice are disclosed as required under CCR Section 260.238(k).

Business Continuity Plan

Overview

EFWM has a Business Continuity Plan designed to recover from interruptions in business and to mitigate impact on clients.

Disasters

In the event of a natural or man-made disaster, the plan identifies alternative office space, methods of client communication, and access to client data. Natural disasters include earthquakes, snow storms, hurricanes, tornadoes, and flooding; and man-made disasters include loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident.

Access to Client Data

Client data is stored in encrypted, secure, cloud-based systems and electronic files are backed up daily and archived offsite. Cloud-based computing systems provide significantly higher levels of data protection than local server-based systems.

Alternate Offices

Multiple alternate office locations have been identified to support ongoing operations in the event our regular place of business is unavailable. In the event we move to an alternate office location, we intend to inform all clients of the alternate location within five days of the disaster necessitating the move.

Privacy Notice

EFWM is committed to your privacy and to maintaining the confidentiality, integrity and security of the personal information our clients entrust to us.

As part of our advising service, we collect nonpublic information from clients which may include information about

- your personal finances
- your health to the extent that it is needed for the financial planning process
- relevant transactions between you and third parties
- tax information
- credit reports or other consumer reporting agencies

This information is used exclusively to help you meet your goals and in the financial planning process. Based on your direction or with your permission we may disclose limited information to your attorney, accountant, mortgage lender, or other third party professional to assist them with providing you with services.

We do not share your non-public information with third parties except in connection with completing your financial plan. These third parties may include your brokerage firm or other custodian of your investment assets, estate attorneys implementing your estate planning needs, or insurance agents implementing your insurance planning needs.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors.

We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors.

Federal and state securities regulators may review our Company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for periods required by federal and state securities laws. After that time, information may be destroyed.

If our privacy policy is expected to change, we will notify you in advance. We are required by law to deliver this Privacy Notice to you annually, in writing.

Empower Financial Wealth Management LLC

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

This Brochure Supplement provides information about Quincy Baynes that supplements Empower Financial Wealth Management LLC ("EFWM") Brochure. You should have received a copy of that Brochure. Please contact us at 760-696-5676 if you did not receive Empower Financial Wealth Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about Quincy Baynes (CRD # 5959936) is available on the SEC's website at

www.adviserinfo.sec.gov.

9330 Baseline Rd # 203
Rancho Cucamonga Ca 91701
Phone: 909-330-1400
Fax: 909-330-1403

quincy@empowerfg.com
www.empowerfg.com

February 24, 2020

Chief Compliance Officer – Quincy Baynes

Year of birth: 1982

Item 2 -Education - Background and Business Experience

Educational Background:

- University of Phoenix; Bachelor of Science in Business with a concentration in Finance; 2017

Employment History:

- 02/2020 - Present Empower Financial Wealth Management Llc - Owner / Chief Compliance Officer
- 01/2019 - Present Baynes Enterprises (Sole Proprietorship) - Owner
- 11/2018 - Present Infinite Success Blueprint (A Book Of Personal Development) - Author
- 07/2015 - Present Build And Scale - Chief Success Strategist
- 01/2011 - Present World Financial Group, Inc. - Agent
- 04/2012 - 01/2020 Transamerica Financial Advisors, Inc - Registered Rep
- 04/2006 - 04/2012 Us Army National Guard - Sergeant
- 07/2009 - 03/2012 Jk Hill & Associates - Helicopter Mechanic
- 09/2011 - 01/2012 Investment Advisors International, Inc. - Investment Advisor Rep
- 11/2006 - 01/2012 Qlb Investments, Llc. - Owner

Item 3 - Disciplinary Information

A. Mr. Baynes has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
2. Is the named subject of a pending criminal proceeding that involves an investment -related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
3. Was found to have been involved in a violation of an investment -related statute or regulation; or
4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

B. Mr. Baynes never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a)denying, suspending or revoking the authorization of the supervised person to act in an investment -related business; (b) barring or

suspending her association with an investment-related business; (c) otherwise significantly limiting her investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on her.

C. Mr. Baynes never been the subject of a self-regulatory organization (SRO) proceeding in which he:

1. Was found to have caused an investment-related business to lose its authorization to do business; or
2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

D. Mr. Baynes has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Member Business Activities Engaged In

World Financial Group (Insurance Agent)

01/11 – Present – Insurance Agent - He will offer Clients services from this business activity. As an insurance agent, he may receive separate yet typical compensation. The business is not investment related but is related to the insurance industry. I spend about 50% of my time on this business.

9330 Baseline Rd. 203 Rancho Cucamonga, CA 91701

Infinite Success Blueprint - "A book on personal development"

11/18-Present – Author - The book is not investment related and I work on it about 5 hours a month, 0 of which is during SEC trading hours.

9330 Baseline Rd. Suite 203, Rancho Cucamonga, CA 91701

Baynes Enterprises (sole proprietorship)

01/18 - Present – Owner - I coach people on how to market their business. I also selling personal development courses along with personal appearance through speaking. I write a blog articles and run this business through the www.buildandscale.com website and brand. This business is not investment related and I work on it about 20 hours a month, 5 of which is during SEC trading hours.

9330 Baseline Rd. 203 Rancho Cucamonga, CA 91701

Baynes Insurance Services (sole proprietorship)

01/20 – Present – Owner/insurance Agent - He will offer Clients services from this business activity. As an insurance agent, he may receive separate yet typical compensation. The business is not investment related but is related to the insurance industry. I spend about 50% of my time on this business.

9330 Baseline Rd. 203 Rancho Cucamonga, CA 91701

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 5-Additional Compensation

Quincy Baynes receives commissions on the insurance he sells. He does not receive any performance-based fees. He does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6-Supervision

Quincy Baynes is the Chief Compliance Officer of EFWM and he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual. He can be reached at Quincy@quincybaynes.com or 760-696-5676.

Item 7 – Requirements for State-Registered Advisors

A. Mr. Baynes has not been involved in any of the following:

1. an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
2. been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.

B. Mr. Baynes filed for Chapter 7 Bankruptcy in August 2010. This action was discharged in December 2010.