This brochure provides information about the qualifications and business practices of Journey Wealth Partners. If you have any questions about the contents of this brochure, please contact us at (978) 369-2911 or by email at: CLIENTSERVICE@JOURNEYWEALTHPARTNERS.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.

The disciplinary history of the investment advisor and its representatives can be obtained from the Massachusetts Securities Division securities@sec.state.ma.us.

Additional information about Journey Wealth Partners is also available on the SEC’s website at www.adviserinfo.sec.gov. Journey Wealth Partners’ CRD number is: 147017

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Registration as a Registered Investment Advisory (RIA) Firm or as an Investment Advisory Representative (IAR) does not imply a certain level of skill or training, however achieving the Certified Financial Planner™ CFP® Certification does require a significant level of skill and training.

Version Date: 03/05/2020
Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment on 03/22/2019 of Journey Wealth Partners. Material changes relate to Journey Wealth Partners’ policies, practices or conflicts of interests.
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Item 4: Advisory Business

A. Description of the Advisory Firm

Journey Wealth Partners (hereinafter “JWP”) is a Limited Liability Company organized in the State of Massachusetts. The firm was formed in March 2008, and the principal owner is Margaret (Peggy) McGillin.

B. Types of Advisory Services

Service Summary for Individuals

Journey works with most clients in one of the following two ways to best meet their needs:

- Annual Journey Comprehensive Wealth Management Service
- Annual Journey Comprehensive Wealth Management Service Plus Portfolio Management

These services have been developed by Journey to effectively meet client needs in a way that allows the client the maximum benefits and offers the highest level of flexibility over their planning and investing. Journey works with clients to ensure they are clear about their priorities and motivates clients to align their financial management in accordance with their most deeply held values.

Detailed Service Descriptions

1. Annual Journey Comprehensive Wealth Management Service

As part of an ongoing relationship with Journey, this service will include, depending on the client’s situation, personal, specific and written recommendations regarding:

- Savings strategies for all goals
- Recommended savings targets, cash flow, and debt management steps
- How to meet educational savings goals or how to pay for college now
- What to do in the immediate years prior to retiring
- How to optimally generate a “paycheck” from savings assets in retirement
- Strategies for minimizing taxes
- Comparing housing options: i.e. stay in home, downsize, rent, condo or house, second home for lifestyle or investment property
- Comparing employment options, risk and reward of large company versus start up, US or international employers/assignments, employment or self-employment with new business, buying employer stock, planning for options and deferred compensation, etc.
• Complete insurance review, including health insurance (if self-employed or a business owner), long-term care analysis, home and auto insurance, umbrella and life insurance and social security.
• Estate planning, life care planning and charitable giving
• Investing advice across 401k plans, IRAs, and brokerage accounts for liquidity needs, risk and return optimization at lower costs, annuity analysis and optimization, rental property, etc.

The attributes of the Wealth Management Service are numerous: a client benefits from being held accountable to their plan, receiving the firm’s proactive and regular plan management and support, access to and advice from Journey throughout the year, plus a complete updated and written year over year progress report, forecast and analysis.

This service is offered for a fixed fee. See Item 5—Fees and Compensation for more detail.

This service is an annual commitment and renews automatically unless either the client or Journey requests to end the agreement in writing.

2. Annual Journey Comprehensive Wealth Management Service plus Portfolio Management

This service is the same as the Annual Journey Wealth Management service described above, and in addition it provides clients with a portfolio management relationship with Journey. Depending on the client’s circumstances and decisions, Journey manages some or all the client’s investments.

JWP’s portfolio management services are based on the individual goals, objectives, time horizon, and risk tolerance of each client. JWP creates an Investment Policy Statement for each client, and/or account, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client’s specific situation. Portfolio management services include, but are not limited to, the following:

<table>
<thead>
<tr>
<th>• Investment Strategy</th>
<th>• Asset Selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Asset Allocation</td>
<td>• Regular Portfolio Monitoring and Rebalancing</td>
</tr>
<tr>
<td>• Risk Tolerance</td>
<td>• Tax Implications</td>
</tr>
<tr>
<td>• Personal Investment Policy</td>
<td>• Income Needs</td>
</tr>
</tbody>
</table>

JWP evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. JWP will require discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. JWP may select sub-advisers to assist it in managing client accounts. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

JWP seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of JWP’s economic, investment or other financial interests. To meet its fiduciary obligations, JWP attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client
portfolios, and accordingly, JWP’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is JWP’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

This service is offered for a fixed fee (see Wealth Management bullet above) plus the cost of asset management. See Item 5—Fees and Compensation for more detail.

This service is an annual commitment and renews automatically unless either the client or Journey requests to end the agreement in writing. After the first year, a client may elect to renew only portfolio management services and not renew comprehensive wealth management services.

Portfolio management services are available to those clients with managed accounts for the household of $500,000 and above.

**Pension Consulting Services**

JWP offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

**Foundation and Corporate Programs**

JWP designs custom programs for Foundations and Corporations depending on the organization’s needs. The scope is negotiated with the organization. Annual Wealth Management Programs are similar in scope provided to individual clients.

Foundations

- Annual Financial Plan Preparation and delivery including employer benefits
- Annual per Participant Wealth Management Program
- Seminars
- Life Event Programs
Corporate Executive Counseling

Employer Sponsored -

- Annual Financial Plan Preparation and delivery including employer benefits
- Annual per Participant Wealth Management Program
- Executive Counseling
- Seminars
- Life Event Programs

Individual/Direct -

- Annual Financial Plan Preparation and delivery including employer benefits
- Annual per Participant Wealth Management Program
- Executive Counseling

**Services Limited to Specific Types of Investments**

JWP generally limits its investment advice to mutual funds, fixed income securities, equities, ETFs and treasury inflation protected/inflation linked bonds, although JWP primarily recommends mutual funds and ETF’s. JWP may use other securities as well to help diversify a portfolio when applicable.

**C. Client Tailored Services and Client Imposed Restrictions**

JWP will tailor a program for each individual client. This will include an interview session to get to know the client’s specific needs and requirements as well as a plan that will be executed by JWP on behalf of the client. In addition to having the client fill out a risk tolerance questionnaire, we spend time understanding what their goals are for their assets and the timing of when they may need them. This may alter the asset allocation with which we choose to move forward.

JWP may use model allocations together with a specific set of recommendations for each client based on their personal values, beliefs, restrictions, needs, and targets within the investment strategies available through JWP. Clients may impose restrictions in investing in certain securities or types of securities outside of those offered as part of our investment strategy.

**D. Wrap Fee Programs**

As of April 23, 2019, JWP is no longer accepting new clients in its wrap program.

JWP acts as portfolio manager and sponsor for a grand-fathered wrap fee program, which is an investment program where the client pays one stated fee that includes management fees and transaction costs.
E. Assets Under Management

JWP has the following assets under management:

<table>
<thead>
<tr>
<th>Discretionary Amounts:</th>
<th>Non-discretionary Amounts:</th>
<th>Date Calculated:</th>
</tr>
</thead>
<tbody>
<tr>
<td>$26,062,468.00</td>
<td>$4,668,881.00</td>
<td>December 2019</td>
</tr>
</tbody>
</table>

Item 5: Fees and Compensation

A. Fee Schedule

Annual Journey Comprehensive Wealth Management Service

The fee for providing comprehensive financial planning is .40% of the advised assets, minimum of $5,000 and maximum of $36,000. Advised assets include assets held in bank, brokerage, retirement and employer accounts including vested stock options but excluding home equity and home equity lines of credit, pensions or unvested or illiquid holdings.

First Year of Service

The fee is based on the amount of the client’s total Advised Assets (as opposed to assets under management) as of the most recent quarter.

The initial Annual Agreement payment will be paid in three installments over the first three months, one third due with the signed agreement, the second third in month 2 and the final third in month 3.

Follow-on Years of Service

Quarterly payments will begin after the 1st anniversary date. The anniversary date is the date the Journey agreement was signed. The annual charge will be billed quarterly in arrears from that time forward. The annual fee will be re-set every two years based on the amount of advised assets at the most recent quarter’s close on the 2nd anniversary date. Once a client’s advised assets are equal to or exceed $9,000,000 then the fee will be increased to our maximum charge of $36,000.
Annual Journey Comprehensive Wealth Management Service plus Portfolio Management

<table>
<thead>
<tr>
<th>Assets Under Management</th>
<th>Annual Fees</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0 - $500,000</td>
<td>0.90%</td>
</tr>
<tr>
<td>Next $500,001 - $1,500,000</td>
<td>0.60%</td>
</tr>
<tr>
<td>Next $1,500,001 - $5,000,000</td>
<td>0.55%</td>
</tr>
<tr>
<td>Next $5,000,001 - $10,000,000</td>
<td>0.45%</td>
</tr>
<tr>
<td>Next $10,000,001 - $20,000,000</td>
<td>0.30%</td>
</tr>
<tr>
<td>Next $20,000,001 - AND UP</td>
<td>Negotiable</td>
</tr>
</tbody>
</table>

Fees are charged on a tiered schedule meaning multiple percentage rates may be applied to the client’s account value to determine the fee. JWP uses the value of the account as of the last business day of the billing period, after considering deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based. This fee is in addition to the wealth management fee described above.

Pension Consulting Services Fees

Asset-Based Fees for Pension Consulting

<table>
<thead>
<tr>
<th>Total Assets Under Management</th>
<th>Annual Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>$1 - $500,000,000</td>
<td>0.75%</td>
</tr>
</tbody>
</table>

JWP uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Clients may terminate the agreement without penalty for a full refund of JWP's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 5 days' written notice. JWP uses an average of the daily balance in the client’s account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.
Foundation and Corporate Programs

Foundation Programs

Fees for Foundational programs are generally charged on a per participant basis for annual terms. Project management and development fees, annual administration fees and pass-through expenses may also be charged as negotiated. Generally, fees are non-refundable once an initial session is provided, or the program is developed or implemented, or as negotiated between Journey and the employer sponsor. The basic fees set forth below represent the fees that may be charged for Foundational programs.

Seminars. Seminar fees vary depending on the number of days of the seminar program, the number of participants involved, and the customization of the program. Fees range from $3,000 to $3,750 per day.

Annual financial plan preparation and delivery including employer benefits range from $2,500 to $5,250 per participant.

Life event programs. Fees for life event programs range from $750 to $7,500 per participant.

Corporate Programs

Employer-Sponsored Programs. Journey typically charges a counseling fee for each individual participating in an Executive Counseling program. Counseling fees may be adjusted in subsequent years to account for cost of living increases. Fees and fee adjustments are negotiable and may vary significantly based on the scope of the engagement and services provided. In addition, Journey reserves the right to make exceptions, on a case by case basis, to current fee ranges. Journey may add a travel surcharge of 15% to its annual counseling fee per individual for services provided that require domestic air travel.

Executive Counseling is offered at an annual counseling fee that generally ranges between $12,000 and $31,200 for individuals participating in the top service tier of the employer-sponsored program, and $8,500 and $12,500 for individuals participating in the second tier of the employer sponsored program.

Individual/Direct. Journey typically charges a fee for each individual receiving Executive Counseling through a program other than an employer-sponsored program. Journey currently offers Executive Counseling to individuals for an annual fee that generally ranges between $10,000 and $30,000. The annual fee may be adjusted in subsequent years to account for cost of living increases or as may be agreed upon by Journey and the client.

Fixed Fees

The rate for creating client pension consulting plans is between $5,000 and $36,000.
Hourly & Month to Month Fees

At times, Journey may make available financial consulting on an hourly or month to month basis (usually for past project clients or family of current clients). The negotiated hourly rate is $350 with a minimum of two hours. Clients signing the annual contract are able to discontinue their agreement with five business days of written notice to Journey. The outstanding balance due will be prorated for the amount of time since the last and next invoice due date. If a client continues with Journey up to the date of the third invoice, the amount due is the minimum annual fee, and the client will then benefit from the Comprehensive Wealth Management service in full.

**NOTE:** All fees are generally negotiable, and the final fee schedule will be memorialized in the client’s advisory agreement. Clients may terminate the agreement, within five business days of signing the Investment Advisory Agreement, without penalty for a full refund.

B. Payment of Fees

**Annual Journey Comprehensive Wealth Management Service**

If the client pays the charge directly, not from their investment accounts managed by Journey, payment will be due monthly or quarterly in January, April, July and October on the 15th of the month. A monthly payment schedule, due on the 15th of each month, is available to clients who set up an automatic payment to Journey.

**Payment of Portfolio Management Fees**

Asset-based portfolio management fees are withdrawn directly from the client’s accounts with client’s written authorization on a quarterly basis, or may be invoiced and billed directly to the client on a quarterly basis. Clients may select the method in which they are billed. Fees are paid in arrears.

**Payment of Pension Consulting Fees**

Asset-based pension consulting fees are withdrawn directly from the client’s accounts with client’s written authorization on a quarterly basis. Fees are paid in arrears.

Fixed pension consulting fees are paid via check. These fees are paid in arrears upon completion.

**Foundation and Corporate Programs**

Foundation and corporate program fees are paid via check. These fees are paid 50% with the signed agreement and 50% upon completion. Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by JWP. Please see Item 12 of this brochure regarding broker-dealer/custodian.
C. Client Responsibility for Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e., custodian fees, commissions, brokerage fees, mutual fund fees, transaction fees, platform fees charged by third party asset manager programs (TAMPs), etc.). Those fees are separate and distinct from the fees and expenses charged by JWP. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

JWP collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned within fourteen days to the client via check, or return deposit back into the client’s account.

For hourly fees that are collected in advance, the fee refunded will be the balance of the fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of termination.

E. Outside Compensation for the Sale of Investment Products to Clients

Neither JWP nor its supervised persons accept any compensation for the sale of any financial products, including asset-based sales charges, service fees from the sale of mutual funds, or insurance products.

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

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

Item 7: Types of Clients

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

❖ Individuals
❖ High-Net-Worth Individuals
❖ Foundations
❖ Private Businesses

Journey requires no asset minimum for Comprehensive Wealth Management services. To participate in JWP’s portfolio management program, a $500,000 minimum per household is required.
A. Methods of Analysis and Investment Strategies

Methods of Analysis

JWP’s methods of analysis include Modern portfolio theory.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

JWP uses long term trading.

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

B. Material Risks Involved

Methods of Analysis

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

Investment Strategies

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

Research has shown that securities that offer higher expected returns share certain characteristics, which we call dimensions. To be considered a dimension, these characteristics must be sensible, persistent over time, pervasive across markets, and cost-effective to capture. Journey works with portfolio and fund companies that structure broadly diversified portfolios that emphasize the dimensions of higher expected returns, while addressing the tradeoffs that arise when executing portfolios. This strategy is evidence based, transparent and cost effective.
Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

**Mutual Funds**: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

**Equity** investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

**Fixed income** investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

**Exchange Traded Funds (ETFs)**: An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.
**Item 9: Disciplinary Information**

**A. Criminal or Civil Actions**

There are no criminal or civil actions to report.

**B. Administrative Proceedings**

There are no administrative proceedings to report.

**C. Self-regulatory Organization (SRO) Proceedings**

There are no self-regulatory organization proceedings to report.

**Item 10: Other Financial Industry Activities and Affiliations**

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

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

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

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

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

Janice Anne Swenor is the Owner of FlexPlan Solutions. FlexPlan Solutions provides back-office support to financial planning firms and other small business. Flexplan Solutions provides business advice and professional services.

Conflicts of interest related to fee-only advisors do apply. Examples of conflicts include:

- Recommending an IRA rollover when the client’s employer plan is better in terms of asset class coverage and lower costs.
• Recommending that a client take a pension distribution as a rollover when electing the annuity option would be better for them in terms of increasing a higher probability of not spending down their assets due to living longer than expected.
• Recommendations to not pay off debt or to make a larger down payment if it would be in the client’s best interest to do so.
• Willfully underserving the client.
• Letting the client believe their future is secure when the planning demonstrates otherwise.
• Not telling the client of the risks associated with their decisions because of not wanting to upset the relationship, an example of this may include not discussing certain insurances such as disability, umbrella or long-term care insurance or that they will need to save more to achieve their goals with a reasonable probability.

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

JWP may select another investment adviser as a sub-adviser to assist it in managing client accounts. The sub-adviser will receive a portion of the portfolio management JWP charges its client. The fees shared will not exceed any limit imposed by any regulatory agency. JWP will always act in the best interests of the client, including when determining other investment adviser to select for clients. JWP will verify that selected advisers are properly licensed, notice filed, or exempt in the states where JWP is selecting the adviser for clients.

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

A. Code of Ethics

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

B. Recommendations Involving Material Financial Interests

JWP does not recommend that clients buy or sell any security in which a related person to JWP or JWP has a material financial interest.
C. Investing Personal Money in the Same Securities as Clients

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

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

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

Item 12: Brokerage Practices

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

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

JWP recommends TCA by E*TRADE or Fidelity Investments.

1. Research and Other Soft-Dollar Benefits

While JWP has no formal soft dollar program in which soft dollars are used to pay for third party services, JWP may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft dollar benefits”). JWP may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client’s transactions paid for it, and JWP does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. JWP benefits by
not having to produce or pay for the research, products or services, and JWP will have an incentive to recommend a broker-dealer based on receiving research or services.

2. *Brokerage for Client Referrals*

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

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

Not all investment advisers allow their clients to direct brokerage. JWP’s Portfolio management service does not permit clients to execute transactions through a specified broker-dealer.

### B. Aggregating (Block) Trading for Multiple Client Accounts

If JWP buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, JWP would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. JWP would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

### Item 13: Review of Accounts

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

For all JWP’s Portfolio Management Service clients, investments are reviewed at least annually by Peggy M McGillin, Principal, or a firm CFP® assigned by Peggy with regards to clients’ respective investment policies and risk tolerance levels.

All accounts are reviewed upon plan creation and plan delivery by Peggy M McGillin, Principal or one or more of the CFP® professionals assigned by Peggy. If a client is no longer a Comprehensive Wealth Management Client, JWP has no further obligation to advise or review the client’s financial situation outside of their managed portfolios and risk tolerance, and no obligation what so ever if no longer a JWP Portfolio management Service client.
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

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

C. Content and Frequency of Regular Reports Provided to Clients

Each client of JWP’s Portfolio Management Service will receive a quarterly report detailing the client’s investment performance if managed by Journey, and the fee calculation. This written report is created by the custodian or the turn-key asset manager (TAMP) or sub-advisor.

Each Comprehensive Wealth Management client will receive a written financial plan 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)

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

B. Compensation to Non-Advisory Personnel for Client Referrals

JWP does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When JWP directs the custodian to deduct its advisory fees directly from client accounts at client’s custodian, JWP will be deemed to have limited custody of client’s assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

JWP provides discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, JWP generally manages the client’s account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some
instances, JWP’s discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to JWP. Journe also offers non-discretionary investment advisory services.

**Item 17: Voting Client Securities (Proxy Voting)**

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

**Item 18: Financial Information**

**A. Balance Sheet**

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

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

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

**C. Bankruptcy Petitions in Previous Ten Years**

JWP has not been the subject of a bankruptcy petition.

**Item 19: Requirements for State Registered Advisers**

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

The education and business backgrounds of JWP's current management persons, Margaret Murphy McGillin, Janice Anne Swenor and Neil Patrick Collins, can be found on the Form ADV Part 2B brochure supplements for those individuals.
B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

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

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

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

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

See Item 10.C and 11.B.