

# **Three Sixty Wealth Management, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: May 8, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Three Sixty Wealth Management, LLC (“360 Wealth” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (630) 219-1695 or by email at [admin@threesixtywm.com](mailto:admin@threesixtywm.com).

360 Wealth is a registered investment advisor with the State of Illinois. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about 360 Wealth to assist you in determining whether to retain the Advisor.

Additional information about 360 Wealth and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 301007.

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## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of 360 Wealth. For convenience, we have combined these documents into a single disclosure document.

360 Wealth believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. 360 Wealth encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

360 Wealth is a newly formed registered investment advisor. This is the initial filing of the Disclosure Brochure.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 301007. You may also request a copy of this Disclosure Brochure at any time by contacting us at (630) 219-1695 or by email at [admin@threesixtywm.com](mailto:admin@threesixtywm.com).

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Three Sixty Wealth Management, LLC (“360 Wealth” or the “Advisor”) is a registered investment advisor with the State of Illinois, which is organized as a Limited Liability Company (LLC) under the laws of the State of Illinois. 360 Wealth was founded in March 2011 and is owned and operated by James Dischert (Founder and Chief Compliance Officer). Since 2011, Three Sixty Wealth Management, LLC has been used as a doing business as name for James Dischert for purposes of marketing while affiliated with other investment advisers and the implementation of insurance related products. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by 360 Wealth.

### **B. Advisory Services Offered**

360 Wealth offers investment advisory services to high net worth individuals, businesses, and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Wealth Management Services

360 Wealth provides Clients with comprehensive wealth management services, which generally includes a broad range of financial planning services as well as discretionary management of investment portfolios.

360 Wealth provides customized investment management services for its Clients as a component of its wealth management service. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. 360 Wealth works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. 360 Wealth will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, or bonds to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

360 Wealth’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. 360 Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

360 Wealth evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. 360 Wealth may recommend, on occasion, redistributing investment allocations to diversify the portfolio. 360 Wealth may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. 360 Wealth may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will 360 Wealth accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement, please see Item 12 – Brokerage Practices.

360 Wealth will provide a broad range of financial planning services to Clients as a component of its wealth management services. Financial planning services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Financial planning services may encompass one or more areas of need, including but not limited to; investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. The Advisor will provide ongoing oversight and monitoring of the recommendations and goals set forth in the financial plan. Clients will have access to contact and/or meet with the Advisor throughout the year depending on the needs of the Client. The Advisor will conduct a formal review at least annually to review the financial plan and ongoing implementation with the Client. Please see Item 13 – Review of Accounts for additional information.

The Advisor will provide online access to financial planning tools and resources through the Advisor's relationship with FinLife Partners, a division of United Capital Financial Advisers, LLC ("FinLife Partners"). Please see below for additional information on FinLife Partners. The Advisor will utilize the technology platform provided by FinLife Partners to assist with the overall maintenance and implementation of the Client's financial plan. The Client will also be provided online access to tools such as financial goal tracking and retirement income strategies.

360 Wealth may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

#### FinLife Partners Technology Platform

As part of its advisory services, the Advisor may utilize a suite of digitally powered technology solutions offered by FinLife Partners, a division of United Capital Financial Advisers, LLC. FinLife Partners provides the Advisor with access to its technology platform that includes use of certain technology platforms, training relating to use of such technology platform, and in some cases certain clerical document and data compilation services. FinLife Partners is not in any way involved in, or responsible for, the individual investment management or guidance provided to Clients. The Advisor pays FinLife Partners a flat fee for its technology platform and the Client for access to FinLife Partners platform pays no additional fees.

#### Use of Independent Managers

360 Wealth may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portion of a Client's investment portfolio. In such instances, the Client may be required to authorize and enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its Clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided

with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures). As part of the Advisor's due diligence efforts, the Advisor will also ensure the Independent Manager is properly registered or noticed file in the state in which the Client resides.

#### Retirement Plan Advisory Services

360 Wealth provides advisory services on behalf of company retirement plans (each a "Plan") and the company/sponsor (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan and its Plan Participants. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

360 Wealth may provide investment advisory services on behalf of the Plan and Plan Sponsor, which may be in either a 3(21) or 3(38) context depending on whether or not the Advisor is also providing discretionary investment management over the Plan assets. For 3(38) services, the Advisor shall have the discretion to select the investments for the Plan and/or make investment decisions on behalf of Plan Participants.

These services are provided by 360 Wealth serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of 360 Wealth's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

#### **C. Client Account Management**

Prior to engaging 360 Wealth to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – 360 Wealth, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – 360 Wealth will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – 360 Wealth will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – 360 Wealth will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

360 Wealth does not sponsor a wrap fee program in connection with their investment management services. However, certain Independent Managers sponsor a wrap fee program. A wrap fee program is defined as any advisory program under which a specified fee or fees not based directly upon transactions in a Client's account is charged for investment advisory services (which may include investment management or advice concerning the selection of other investment advisers) and the execution of Client transactions.

#### **E. Assets Under Management**

360 Wealth is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2019 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### **A. Fees for Advisory Services**

#### Wealth Management Services

Wealth management fees are paid quarterly in advance of each calendar quarter pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter. Wealth management fees are based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$1,000,000	1.50%
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 and above	0.75%

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by 360 Wealth will be independently valued by the Custodian. 360 Wealth will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Use of Independent Managers

The Client will be separately charged an asset-based fee by the Independent Manager[s] for discretionary investment management. The Advisor does not share in these fees nor have the ability to negotiate these fees. Independent Manager fees will generally range from 0.25% to 0.50% annually. The Advisor will ensure the Client receives all disclosures regarding the Advisor's fees and the Independent Manager's fees. Clients should refer to the Independent Manager's Form ADV Part 2A for additional information regarding fees.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 1.50%, billed in advance of each calendar quarter, pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior calendar. Fees may be negotiable depending on the size and complexity of the services to be provided to the Plan. Fees in the first quarter of the engagement are prorated from the effective date of the Agreement to the end of the first quarter. Fees range are generally based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
Up to \$1,000,000	1.50%
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 and above	0.75%

### **B. Fee Billing**

#### Wealth Management Services

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Wealth management fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with 360 Wealth at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by 360 Wealth to be paid directly from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

#### Use of Independent Managers

An asset-based fee is calculated by the Independent Manager[s] or delegate and deducted from the Client's account[s] at the Custodian. The fee to each Independent Manager is separate and in addition to the fees charged by the Advisor. The Independent Manager shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] for the respective quarter-end period pursuant to the Independent Manager[s] contractual fee methodology. All securities held in accounts will be independently valued by the Custodian or the Independent Manager[s]. The Advisor will not have the authority or responsibility to value portfolio securities.

#### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than 360 Wealth, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The fees charged by 360 Wealth are separate and distinct from these custody and execution fees.

In addition, all fees paid to 360 Wealth for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of 360 Wealth, but would not receive the services provided by 360 Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by 360 Wealth to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

#### **D. Advance Payment of Fees and Termination**

##### Wealth Management Services

360 Wealth may be compensated for its services in advance of the quarter in which quarter wealth management services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

##### Use of Independent Managers

In the event that a Client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. 360 Wealth will assist the Client with the termination and transition as appropriate.

##### Retirement Plan Advisory Services

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360 Wealth is compensated for its services at the beginning of the quarter before advisory services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. The Advisor will refund any unearned, prepaid investment advisory fees from the effective date of termination to the end of the quarter. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

360 Wealth does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

#### Insurance Agency Affiliations

James Dischert is also licensed as an independent insurance professional. As an independent insurance professional, Mr. Dischert may earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by Mr. Dischert are separate and in addition to 360 Wealth's advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Dischert.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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360 Wealth does not charge performance-based fees for its investment advisory services. The fees charged by 360 Wealth are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

360 Wealth does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

#### **Item 7 – Types of Clients**

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360 Wealth offers investment advisory services to high net worth individuals, businesses and retirement plans in State of Illinois and other states. The amount of each type of Client is available on 360 Wealth's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. 360 Wealth generally requires a minimum relationship size of \$1,000,000 to effectively implement its investment process.

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

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##### **A. Methods of Analysis**

360 Wealth primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from 360 Wealth are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. This criteria consists generally of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, 360 Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. 360 Wealth will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, 360 Wealth may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. 360 Wealth will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with certain components of the Advisor's strategies:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6)

Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Independent Manager Risks

Performance of an Independent Manager may include the above-referenced risks. Further, an Independent Manager may not achieve the expected performance for its strategy[ies].

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

#### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving 360 Wealth or its owner/any of its Supervised Persons.** 360 Wealth values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 301007.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

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##### Insurance Agency Affiliations

As noted in Item 5 – Fees and Compensation, Mr. Dischert is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from their role with the Advisor. As an insurance professional, Mr. Dischert may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Dischert is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Dischert or the Advisor.

##### Other Registered Investment Advisor Affiliation

Mr. Dischert is also an Investment Advisor Representative (“IAR”) of Capital Asset Advisory Services, LLC (“Capital Asset”) (CRD# 110929). As a financial advisor with Capital Asset, Mr. Dischert will receive investment advisory fees for investment management services offered. Mr. Dischert will provide each Client with Capital Asset’s Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Mr. Dischert or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Capital Asset on the same investment assets.

#### **Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

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##### **A. Code of Ethics**

360 Wealth has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with 360 Wealth (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. 360 Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of 360 Wealth’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (630) 219-1695 or via email at [admin@threesixtywm.com](mailto:admin@threesixtywm.com).

## **B. Personal Trading with Material Interest**

360 Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. 360 Wealth does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. 360 Wealth does not have a material interest in any securities traded in Client accounts.

## **C. Personal Trading in Same Securities as Clients**

360 Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by 360 Wealth by conducting a coordinated review of personal accounts and the accounts of the Clients. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

## **D. Personal Trading at Same Time as Client**

While 360 Wealth allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will 360 Wealth, or any Supervised Person of 360 Wealth, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

360 Wealth does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize 360 Wealth to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, 360 Wealth does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where 360 Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by 360 Wealth. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. 360 Wealth may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and its reputation and/or the location of the Custodian's offices.

The Advisor primarily recommends TD Ameritrade Institutional, a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **360 Wealth does not participate in soft dollar programs sponsored or offered by any**

**broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 – Client Referrals and Other Compensation.**

**2. Brokerage Referrals** - 360 Wealth does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All Clients are serviced on a “directed brokerage basis”, where 360 Wealth will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client’s account[s]). 360 Wealth will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. 360 Wealth will execute its transactions through the Custodian as authorized by the Client. 360 Wealth may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by James Dischert, Chief Compliance Officer of 360 Wealth. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client’s request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client’s financial situation, and/or large deposits or withdrawals in the Client’s account[s]. The Client is encouraged to notify 360 Wealth if changes occur in the Client’s personal financial situation that might adversely affect the Client’s investment plan. Additional reviews may be triggered by material market, economic or political events.

### **C. Review Reports**

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian’s website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client’s account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

## **Item 14 – Client Referrals and Other Compensation**

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### **A. Compensation Received by 360 Wealth**

360 Wealth does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. 360 Wealth may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, 360 Wealth may receive non-compensated referrals of new Clients from various third-parties.

### **Participation in Institutional Advisor Platform**

As disclosed under Item 12, above, the Advisor participates in TD Ameritrade's institutional customer program and the Advisor may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, the Advisor endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

### **B. Client Referrals from Solicitors**

360 Wealth does not engage paid solicitors for Client referrals.

### **Item 15 – Custody**

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360 Wealth does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct 360 Wealth to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by 360 Wealth to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

### **Item 16 – Investment Discretion**

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360 Wealth generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by 360 Wealth. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by 360 Wealth will be in accordance with each Client's investment objectives and goals.

### **Item 17 – Voting Client Securities**

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360 Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## Item 18 – Financial Information

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Neither 360 Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of 360 Wealth to meet all obligations to its Clients. Neither 360 Wealth, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. 360 Wealth is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$500 or more for services to be performed six months or more in the future.

## Item 19 – Requirements for State Registered Advisors

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### A. Educational Background and Business Experience of Principal Officer

The Founder and Chief Compliance Officer of 360 Wealth is James Dischert. Information regarding the formal education and background of James Dischert is included in Item 2 – Educational Background and Business Experience of each Part 2B below.

### B. Other Business Activities of Principal Officer

Mr. Dischert is dedicated to the investment advisory activities of 360 Wealth's Clients. Mr. Dischert has additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

### C. Performance Fee Calculations

360 Wealth does not charge performance-based fees for its investment advisory services. The fees charged by 360 Wealth are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

### D. Disciplinary Information

***There are no legal, civil or disciplinary events to disclose regarding 360 Wealth or Mr. Dischert.***

Neither 360 Wealth nor Mr. Dischert have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against 360 Wealth or Mr. Dischert.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding 360 Wealth or Mr. Dischert.

### E. Material Relationships with Issuers of Securities

Neither 360 Wealth nor Mr. Dischert have any relationships or arrangements with issuers of securities.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**James R. Dischert  
CEO and Chief Compliance Officer**

**Effective: May 8, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of James R. Dischert (CRD# 5204944) in addition to the information contained in the Three Sixty Wealth Management, LLC (“360 Wealth” or the “Advisor”, CRD# 301007) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 360 Wealth Disclosure Brochure or this Brochure Supplement, please contact us at (630) 219-1695 or by email at [admin@threesixtywm.com](mailto:admin@threesixtywm.com).

Additional information about Mr. Dischert is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5204944.

## Item 2 – Educational Background and Business Experience

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James R. Dischert, born in 1972, is dedicated to advising Clients of 360 Wealth as the CEO and Chief Compliance Officer. Mr. Dischert also attended Illinois Central College. Additional information regarding Mr. Dischert's employment history is included below.

### Employment History:

CEO and Chief Compliance Officer, Three Sixty Wealth Management, LLC	07/2007 to Present
Financial Advisor, Capital Asset Advisory Services, LLC	03/2013 to Present

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Dischert.*** Mr. Dischert has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Dischert.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Dischert.***

However, we do encourage you to independently view the background of Mr. Dischert on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5204944.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Dischert is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Dischert's role with 360 Wealth. As an insurance professional, Mr. Dischert may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Dischert is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Dischert or the Advisor.

### Other Registered Investment Advisor Affiliation

Mr. Dischert is also an Investment Advisor Representative ("IAR") of Capital Asset Advisory Services, LLC ("Capital Asset") (CRD# 110929). As a financial advisor with Capital Asset, Mr. Dischert will receive investment advisory fees for investment management services offered. Mr. Dischert will provide each Client with Capital Asset's Form ADV 2A or equivalent disclosure brochure, in advance of providing investment management services. At no time will Mr. Dischert or the Advisor earn both ongoing investment advisory fees under the Advisor and ongoing investment advisory fees through Capital Asset on the same investment assets.

## Item 5 – Additional Compensation

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Mr. Dischert has additional business activities where compensation is received that are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Dischert serves as the CEO and Chief Compliance Officer and Chief Compliance Officer of 360 Wealth. Mr. Dischert can be reached at (630) 219-1695.

360 Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 360 Wealth. Further, 360 Wealth is subject to regulatory

oversight by various agencies. These agencies require registration by 360 Wealth and its Supervised Persons. As a registered entity, 360 Wealth is subject to examinations by regulators, which may be announced or unannounced. 360 Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Item 7 – Requirements for State Registered Advisors**

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### **A. Arbitrations and Regulatory Proceedings**

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable 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; or
  - e. dishonest, unfair, or unethical practices.
  
2. An award or otherwise being 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; or
  - e. dishonest, unfair, or unethical practices.

Mr. Dischert does not have any disclosures to make.

### **B. Bankruptcy**

If a supervised person has been the subject of a bankruptcy petition, that fact and the details must be disclosed. Mr. Dischert does not have any disclosures to make.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Dena S. Abdelaziz  
Associate Advisor**

**Effective: May 8, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Dena S. Abdelaziz (CRD# 7074382) in addition to the information contained in the Three Sixty Wealth Management, LLC (“360 Wealth” or the “Advisor”, CRD# 301007) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the 360 Wealth Disclosure Brochure or this Brochure Supplement, please contact us at (630) 219-1695 or by email at [admin@threesixtywm.com](mailto:admin@threesixtywm.com).

Additional information about Ms. Abdelaziz is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 7074382.

## Item 2 – Educational Background and Business Experience

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Dena S. Abdelaziz, born in 1995, is dedicated to advising Clients of 360 Wealth as an Investment Advisor Representative. Ms. Abdelaziz also earned a Bachelor of Science in Business from Eastern Illinois University in 2017. Additional information regarding Ms. Abdelaziz's employment history is included below.

### Employment History:

Associate Advisor, Three Sixty Wealth Management, LLC	04/2019 to Present
Associate Advisor, Capital Asset Advisory Services, LLC	08/2018 to Present
Staff Accountant, Pot Belly Sandwiches	06/2017 to 08/2018
Student, Eastern Illinois University	08/2013 to 05/2017

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Ms. Abdelaziz.** Ms. Abdelaziz has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Abdelaziz.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. **As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Abdelaziz.**

However, we do encourage you to independently view the background of Ms. Abdelaziz on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 7074382.

## Item 4 – Other Business Activities

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Ms. Abdelaziz is dedicated to the investment advisory activities of 360 Wealth's Clients. Ms. Abdelaziz does not have any other business activities.

## Item 5 – Additional Compensation

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Ms. Abdelaziz is dedicated to the investment advisory activities of 360 Wealth's Clients. Ms. Abdelaziz does not receive any additional forms of compensation.

## Item 6 – Supervision

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Ms. Abdelaziz serves as an Investment Advisor Representative of 360 Wealth and is supervised by James Dischert, the Chief Compliance Officer. Mr. Dischert can be reached at (630) 219-1695.

360 Wealth has implemented a Code of Ethics an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of 360 Wealth. Further, 360 Wealth is subject to regulatory oversight by various agencies. These agencies require registration by 360 Wealth and its Supervised Persons. As a registered entity, 360 Wealth is subject to examinations by regulators, which may be announced or unannounced. 360 Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Item 7 – Requirements for State Registered Advisors

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### A. Arbitrations and Regulatory Proceedings

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable 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; or
  - e. dishonest, unfair, or unethical practices.
  
2. An award or otherwise being 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; or
  - e. dishonest, unfair, or unethical practices.

Ms. Abdelaziz does not have any disclosures to make.

**B. Bankruptcy**

If a supervised person has been the subject of a bankruptcy petition, that fact and the details must be disclosed.

Ms. Abdelaziz does not have any disclosures to make.

## Privacy Policy

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Effective: May 8, 2019

### Our Commitment to You

Three Sixty Wealth Management, LLC (“360 Wealth” or the “Advisor”) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. 360 Wealth (also referred to as “we”, “our” and “us”) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

360 Wealth does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> 360 Wealth does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where 360 Wealth or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> 360 Wealth does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (630) 219-1695 or via email at [admin@threesixtywm.com](mailto:admin@threesixtywm.com).