Total Clarity Wealth Management, Inc.

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Total Clarity Vision Account

WRAP FEE BROCHURE

March 24, 2025

This brochure provides clients with information about the qualifications and business practices of Total Clarity Wealth Management, Inc. and the Total Clarity Vision Wrap Program that should be considered before becoming a client. If you have any questions about the contents of this Brochure, please contact us at (630) 762-9352 and/or info@totalclaritywealth.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.

Additional information about Total Clarity Wealth Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Total Clarity Wealth Management, Inc. is 142728.

Any reference to Total Clarity Wealth Management, Inc. as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.

Item 2 MATERIAL CHANGES

At least annually, this section will discuss only specific material changes that are made to the Total Clarity Wealth Management, Inc. Wrap Vision Account Brochure and provide you with a summary of such changes. Additionally, reference to the date of the last annual update to the brochure will be provided.

Since our last annual updating amendment dated March 28, 2024, we have made the following material changes:

> We have begun offering Separately Managed Accounts available through LPL Financial, See Item 4, Services, Fees and Compensation for additional disclosure regarding the programs and fees.Total Clarity provides advisory services through certain programs sponsored by LPL Financial. These programs are managed by LPL or an approved third-party manager on a discretionary basis. All accounts under any of these programs are held at LPL Financial. When selecting a Separately Managed Account for a client, Total Clarity shall review information about the program such as its disclosure statement and/or material supplied by the Independent Manager or independent third parties for a description of the Independent Manager's investment strategies, past performance, and risk results to the extent available. Factors that Total Clarity shall consider in selecting an account type, the model and third-party manager, include the stated client investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

A copy of our updated brochure and brochure supplements may be requested by contacting us at (630) 762-9352 and/or info@totalclaritywealth.com. These documents are available to you free of charge and are also available on our website at www.totalclaritywealth.com..

Additional information about Total Clarity Wealth Management, Inc. is also available via the SEC's website www.adviserinfo.sec.gov. Our IARD number is 142728. The SEC's website also provides information about any persons affiliated with Total Clarity Wealth Management, Inc. who are registered, or are required to be registered, as Advisory Representatives of Total Clarity Wealth Management, Inc.

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INTRODUCTION

Total Clarity Wealth Management, Inc. is an investment adviser registered with the Securities and Exchange Commission. Total Clarity Wealth Management offers advice regarding mutual funds and stocks as well as other products such as: variable annuities, bonds, options, government securities, certificates of deposit, Unit Investment Trusts (UITs), Exchange Traded Funds (ETFs) and 529 College Savings Plans. Total Clarity Wealth Management utilizes the clearing and custody services of Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab") an unaffiliated SEC registered Broker/Dealer and FINRA member. Total Clarity has also entered into a relationship to offer you brokerage and custodial services through LPL Financial (LPL) an unaffiliated SEC registered Broker-dealer and Member FINRA/SIPC.

In its capacity as a registered investment adviser, Total Clarity Wealth Management offers various advisory services as further disclosed in its Part 2A Brochure. The programs offered include two available wrap fee programs entitled the **"***Total Clarity Vision Account"* and the *"Total Clarity Vision CB Account".* Both *Vision* wrap accounts "wrap" all of the transaction charges in with the advisory fee, versus having each transaction charge billed directly to the client's account.

Advisory Services

The wrap fee programs offer clients a fee-based account for which the client will pay a quarterly fee for portfolio review and on-going asset management services and brokerage services. Clients will maintain an account that will contain one or more of the following: stocks, bonds, options (such as covered calls and long puts), government securities, Exchange Traded Funds (ETFs), Unit Investment Trusts (UITs), and certain types and classes of variable annuities and mutual funds. Some accounts also hold Alternative Investments such as Real Estate Investment Trusts (REITs), Business Development Companies (BDCs), and private equities, as a courtesy to the client. These products are not part of the Wrap Fee Program and therefore advisory fees will not be charged on these holdings, but a commission will be paid to the Advisory Representative (in their role as a Registered Representative of LPL) at the time of purchase. Transaction or holding costs for Alternative Investment products are not covered within the wrap fee agreement.

The *Total Clarity Vision Account* and the *Total Clarity Vision CB Account* programs offer clients portfolio review and asset management services on a discretionary basis. Discretionary asset management services allow the Advisory Representative to make buys, sells and exchanges within the account as the Advisory Representative deems appropriate, without obtaining the client's prior consent to the transaction(s). Discretionary approval is given when the client signs the Schwab or LPL Financial Account Application. By signing the custodian's Account Application, the client provides the Advisory Representative with discretionary approval for their account. The Advisory Representative will determine the securities to be purchased and sold in the account and will alter the securities holdings from time to time, without prior consultation with the client. Unless otherwise expressly requested by the client, Total Clarity will manage the account and will make changes to the allocation as deemed appropriate by the firm and the Advisory Representative. The client can discuss with the Advisory Representative their desire to be notified of any recommendations before buying or selling any securities in their account, but in order to trade at our custodians, the Advisory Representative must be given discretion on all accounts. All clients will be sent, by the custodian of their account, either by mail or electronically, confirmations of any trades done in their account. If a client decides they no longer want discretion granted, it will result in the closing of the account.

Depending on the client's specific goals, objectives and market circumstances, we will generally hold positions in an account for a long term, even more than a year, or, depending on market conditions, we will actively trade some securities held in an account for periods of 30 days or less. Advisory

Representatives will be reasonably available to the client to provide advice, make recommendations and execute transactions. Since our investment strategies and advice are based on each client's specific financial situation, the investment advice we provide to you may be different or conflicting with the advice we give to other clients regarding the same security or investment.

Advisory Representatives will gather information on the client's financial history, goals, objectives and financial concerns and assist the client in developing an asset allocation strategy. The client will establish an account with Schwab or LPL Financial. Based on the client's investment objectives, risk tolerance and financial situation, the Advisory Representative will provide the level of services requested by the client (i.e., asset management on a continuous and ongoing basis or portfolio review services). Some Total Clarity Advisory Representatives manage portfolio models, and other of our advisors customize the holdings within each account according to the client's financial history, status and risk tolerance. One of the tools available for use by our Advisory Representatives are portfolio models provided by a third party through Schwab or directly from the third party's website at no charge to Total Clarity or the client, although the third party could benefit from internal expenses charged by the holdings. Your Advisory Representative can use these models as a guide in managing your account, but he is responsible for making all decisions and completing all trades himself. Advisory Representatives also have available, the use of separately managed accounts through LPL that use LPL or another firm to manage the holdings in the account. Some of these programs are available at no charge to the client while others may result in an additional fee. Therefore, strategies will vary between clients having the same Advisory Representative, as well as for clients with different Advisory Representatives.

You are able to request that your Advisory Representative add reasonable trading restrictions ("Reasonable Restrictions") to your advisory account at any time during the management of your account. Your Advisory Representative or Total Clarity has the option to decline or terminate the account if we feel your elected Reasonable Restrictions are too prohibitive, and we do not feel the account can be managed within our program. Restrictions imposed on management of an account, even those considered reasonable, will affect your account performance and may mean the performance in the account is different than the performance of other similarly managed accounts.

Advisory Representatives will contact clients at least annually, or at the client's request, to discuss the *Total Clarity Vision Account* or the *Total Clarity Vision CB Account* investment portfolio and to update the client's financial information when any changes have occurred. Clients are able to request more frequent reviews and set thresholds for triggering events that would cause a review to take place. Generally, Advisory Representatives will recommend changes to clients' portfolios based on many factors including: shifts in the economy, changes in the management and/or structure of a mutual fund or company in which clients' assets are invested, to rebalance the portfolio and market shifts and/or corrections.

Generally, the Advisory Representative who solicited the client will conduct the annual review. Clients are advised they should notify their Advisory Representative promptly of any changes to their goals, objectives or financial situation. Failure of the client to notify the Advisory Representative of any such changes could result in investment recommendations that do not match the client's needs.

Third-Party Created Model Portfolios

Total Clarity has entered into an agreement with a service provider which provides us with access to certain model portfolios as well as trading instructions. These services allow us to provide model portfolios comprised of stocks and exchange-traded fund products but other products such as mutual funds are also available to us.

Total Clarity does not pay the provider for these services and the advisory fees you pay are not increased because we use these services. These services allow us to provide our clients with operational and advisory efficiencies which may create a conflict of interest since the models use mutual funds and exchange-traded funds that may pay fees to the service provider. It is possible that there are other exchange-traded funds and mutual funds not included in these models that may be in our clients' best interest. In all cases we strive to recommend only products and services that we believe are in your best interest and have the lowest cost share class. We have the ability to make substitutions to the investment selections listed in the models and to deviate from the trading instructions provided to us.

Accounts invested in these investment models that include mutual funds may be subject to short-term redemption fees imposed by custodians and/or the mutual fund sponsor. Total Clarity is not responsible for these short-term redemption fees. They are the responsibility of the client.

These models are available for use with qualified and non-qualified accounts. Advisory Representatives will pay approximately 10 to 20 basis points (0.10% to 0.20%) to Total Clarity from their portion of the advisory fee you pay to cover our administration and operational costs. Clients are not billed directly for the use of these models.

Separately Managed Accounts

Total Clarity provides advisory services through certain programs sponsored by LPL Financial. These programs are managed by LPL or an approved third-party manager on a discretionary basis. All accounts under any of these programs are held at LPL Financial. Each program is described below and additional information such as any fees that apply and potential conflicts of interest are available on the associated Account Agreement and LPL's Form ADV, Part 2A.

When selecting a Separately Managed Account for a client, Total Clarity shall review information about the program such as its disclosure statement and/or material supplied by the Independent Manager or independent third parties for a description of the Independent Manager's investment strategies, past performance, and risk results to the extent available. Factors that Total Clarity shall consider in selecting an account type, the model and third-party manager, include the stated client investment objective(s), management style, performance, reputation, financial strength, reporting, pricing, and research.

> **Manager Access Select Program (MAS)** – this program offers Total Clarity the ability to work with the client to identify a third-party portfolio manager (SMA Portfolio Manager) from a list of SMA Portfolio Managers made available by LPL and the SMA Portfolio Manager will manage the client's assets on a discretionary basis. Total Clarity will provide initial and ongoing assistance regarding the SMA Portfolio Manager selection process and review of the account. The minimum account size is $25,000 for the Program but can be higher depending on the particular SMA Portfolio Manager strategy or Model Portfolio selected.
>
> The SMA Portfolio Manager will have discretion to invest among a broad variety of security types, including but not limited to equities, fixed income securities, options, mutual funds, closed-end funds, and exchange-traded funds ("ETFs").
>
> The fees paid to SMA Portfolio Managers in the SMA Platform are generally less than fees those advisors would charge a client seeking to establish a direct relationship with them outside of a wrap program. This is principally due to the fact that LPL absorbs many of the billing, administrative, and marketing expenses that would otherwise be borne by those advisors, including trading expenses.

Optimum Market Portfolios Program (OMP) - OMP offers clients the ability to participate in a third party managed account using Optimum Fund mutual funds. The client will authorize LPL on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Total Clarity will assist the client in determining the suitability of OMP and in setting an appropriate investment objective. Total Clarity will have discretion to select a mutual fund asset allocation portfolio designed by LPL consistent with the client's investment objective. A minimum account value of $10,000 is required for OMP account.

Model Wealth Portfolios (MWP) - Model Wealth Portfolios (MWP) offers clients a professionally managed mutual fund or ETF asset allocation program. Total Clarity will work with the client to obtain the client's suitability information and to determine the suitability of the MWP program and an appropriate investment objective. Total Clarity will work with the client to open the MWP account at LPL and to select a model portfolio designed by LPL's Research Department. LPL 's Research Department, a third-party portfolio strategist or the Advisory Representative may act as portfolio strategist responsible for selecting the mutual funds or ETFs within a model portfolio and for making changes to these holdings. The minimum account size is $10,000 for the MWP accounts but can be higher depending on the particular Model Portfolio selected.

The client will authorize LPL or the SMA Portfolio Manager to act on a discretionary basis to purchase and sell mutual funds, ETFs, stocks and fixed income products and to liquidate previously held securities in any of these three program types. The client also authorized LPL to effect rebalancing for accounts in these programs.

IRA Rollover Recommendations
For purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

We benefit financially from the rollover of your assets from a retirement account to an account that we manage or provide investment advice, because the assets increase and, in turn, so do our advisory fees. As a fiduciary, we only recommend a rollover when we believe it is in your best interest.

IRA Rollover Considerations
As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our

management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

If you are considering rolling over your retirement funds to an IRA for us to manage here are a few points to consider before you do so:

1. Determine whether the investment options in your employer's retirement plan address your needs or whether you might want to consider other types of investments.
    1. Employer retirement plans generally have a more limited investment menu than IRAs.
    2. Employer retirement plans may have unique investment options not available to the public such as employer securities, or previously closed funds.
2. Your current plan may have lower fees than our fees.
    1. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    2. You should understand the various products and services you might take advantage of at an IRA provider and the potential costs of those products and services.
3. Our strategy may have higher risk than the option(s) provided to you in your plan.
4. Your current plan may also offer financial advice.
5. If you keep your assets titled in a 401k or retirement account, you could potentially delay your required minimum distribution beyond age 73.
6. Your 401k may offer more liability protection than a rollover IRA; each state may vary. Generally, federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies. However, there can be some exceptions to the general rules so you should consult with an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401k, but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses or the purchase of a home.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire us as the manager and keep the assets titled in the plan name.

It is important that you understand the differences between these types of accounts and to decide whether a rollover is best for you. Prior to proceeding, if you have questions contact your investment adviser representative, or call our main number as listed on the cover page of this brochure.

Advisory Fees

Opening an Account (initial fees): The initial pro-rated fee is charged in arrears and is based on the inflow of cash and assets and the proportion of the number of days remaining in the quarter on the date these assets were delivered into the account. Initial advisory fees will be collected directly from the account, provided the client has given Total Clarity Wealth Management written authorization to do so.

An Established Account (ongoing fees): Ongoing fees will be charged quarterly, in advance - based on the value of the account* on the last day of the previous quarter. Fees are charged to and collected directly from the advisory account early in the quarter. Clients will be provided with a fee invoice that identifies:

1. The value of the account* on the last day of the previous quarter (from which the advisory fee is calculated).
2. The quarterly advisory fee to be charged to the account(s).
3. The accounts(s) from which the fee will be deducted.

*Account values in the Orion reporting system will be used for Total Clarity's quarterly fee calculations for advisory accounts. Although account holdings and asset valuations should generally match, month-end market values reflected in Orion's reporting system sometimes differ from those provided the custodian on their month-end statements. The three most common reasons why these values may differ are (i) differences in the manner in which accrued interest is calculated, (ii) differences in the date upon which "as of" dividends and capital gains are reported, and (iii) differences in whether settlement date valuations or trade date valuations are used. If you have any questions or believe there are material discrepancies between your custodial statement and Orion's reporting system, please contact Total Clarity at (630) 762-9352. You may request a copy the Orion report valuations from your Total Clarity Advisory Representative. The custodian account values will be used for the quarterly fee calculation for Vision CB accounts.

If the account does not contain sufficient funds to pay the quarterly advisory fee, Total Clarity Wealth Management has limited authority to sell or redeem securities within the advisory account in a sufficient amount to pay the fee. The client can reimburse the account for advisory fees paid to Total Clarity Wealth Management, with the exception of an IRA account.

Our fees are negotiable and are not based on a share of capital gains or capital appreciation of the funds, but rather on the value of the account. Advisory fees for our *Total Clarity Vision Account* and the *Total Clarity Vision CB Account* programs will be charged in advance on a quarterly basis, based on the account balance on the last working day of the previous quarter.

Clients can make additions to or withdrawals from the account, provided the account continues to meet minimum account size requirements. Advisory fees will be adjusted each quarter for any inflows and outflows of cash and holdings over or equal to $10,000 in a single day. For example, if $10,000 is withdrawn from an account midway through a quarter, a pro-rated amount which is equal to the annual fee on that $10,000 divided by the number of days in the year to get a daily rate and then multiplied by the number of days remaining in the quarter, will be credited toward the advisory fee for the next quarter. If a tiered fee schedule is used, the total account value at the end of the quarter will determine the tier breakpoints. If $10,000 is added to an account midway through a quarter, a pro-rated amount which is equal to the annual fee on that $10,000 divided by the number of days in the year to get a daily rate and then multiplied by the number of days remaining in the quarter, will be added to the advisory fee for the next quarter. If a tiered fee schedule is used, the total account value on the day of the deposit will determine the tier breakpoints. No fee adjustments will be made for appreciation or depreciation of the account during a quarter or for transfers between two Total Clarity accounts within the same household. Cash flow adjustments on Vison CB accounts are made for ANY client additions or withdrawals regardless of size. Cash flow adjustments will not be made on fixed fee client accounts.

Not all clients receive Quarterly Client reviews. For example, Vision CB accounts do not receive Quarterly Client reviews and therefore do not receive a fee notification.

Fees are based solely on account balance(s) and are not based on a share of capital gains upon or capital appreciation of, the funds or any portion of the funds. Fees are in accordance with the following fee schedules:

- **Total Clarity Vision (Wrap) Program**

Total Clarity Vision Accounts are billed based on the account value as of the last day of the quarter. Advisory fees will be adjusted each quarter for any client inflows and outflows of cash and holdings equal to or over $10,000 in a single day.

"First Next Next" Billing Schedule

Account Size	***Vision* Maximum Annual Fee**
$0 to $50,000	2.75%
Next $50,001 to $100,000	2.75%
Next $100,001 to $250,000	2.75%
Next $250,001 to $500,000	2.50%
Next $500,001 to $1,000,000	2.00%
Next $1,000,001 to $3,000,000	1.75%
Next $3,000,001 to $5,000,000	1.75%
$5,000,001 and above	1.75%

- **Total Clarity Vision CB (Wrap) Program**

Total Clarity Vision CB Wrap Accounts are billed based on the account value as of the last day of the quarter. Advisory fees will be adjusted each quarter for any client inflows and outflows of cash and holdings. Fees may be calculated on a First Next Next schedule or a Breakpoint schedule.

"Breakpoint" Billing Schedule

Household Total Assets in Advisory Accounts	***Vision CB* Maximum Annual Fee**
$0 to $50,000	2.75%
Next $50,001 to $100,000	2.75%
Next $100,001 to $250,000	2.75%
Next $250,001 to $500,000	2.50%
Next $500,001 to $1,000,000	2.00%
Next $1,000,001 to $3,000,000	1.75%
Next $3,000,001 to $5,000,000	1.75%

$5,000,001 and above	1.75%

"First Next Next" Billing Schedule

Account Size	***Vision CB* Maximum Annual Fee**
$0 to $50,000	2.75%
Next $50,001 to $100,000	2.75%
Next $100,001 to $250,000	2.75%
Next $250,001 to $500,000	2.50%
Next $500,001 to $1,000,000	2.00%
Next $1,000,001 to $3,000,000	1.75%
Next $3,000,001 to $5,000,000	1.75%
$5,000,001 and above	1.75%

Your Advisory Representative will negotiate your specific fee with you, based on the fee schedule outlined above. We make exceptions to our general fee schedule under certain circumstances (e.g., responsibilities involved, accounts or groups of accounts which are expected to have significant capital additions in the future, anticipated future earning capacity, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.). In such cases, lower fees or different payment arrangements can be negotiated with each client separately and will be described in your Vision Account Agreement. Fees vary from client-to-client and are detailed on the Total Clarity Vision or Vision CB Account Agreement you will sign; however, fees will not exceed the schedule shown above. Therefore, your Advisory Representative will charge more or less than another Advisory Representative.

The First Next Next fee schedule is a tiered schedule. More than one fee rate will apply to the account if the total account value* is $50,001 or more at the time of valuation for the purposes of the fee calculation. Total Clarity retains a portion of the advisory fees equal to 0.08%-0.16% of the account value annually to cover administrative costs. In certain situations, a portion of the net advisory fee will be paid to the Advisory Representative's supervisor and/or branch manager. LPL Financial will receive an annual oversight fee of 0.03%-0.05% times the value of each account for supervision and back-office administration. This is only for accounts managed by Advisory Representatives who are also registered with LPL and assets are held at Schwab. This fee is pulled from the advisory fee before the remainder of the fee is paid to your Advisory Representative and is only assessed to Representatives who are also Registered Representatives with LPL. The remainder of the fee is paid to your Advisory Representative. Total Clarity is allowed to change the above fee schedule upon 30-days prior written notice to you.

The quarterly fee is calculated based on the number of days in the quarter and not on the annual fee divided by four. For example, an annual fee of $5,000 is multiplied by the number of days in the quarter and divided by the number of days in the year to arrive at the quarterly fee.

Note: If negotiated, Total Clarity will charge a flat fee, not to exceed the rate % noted above, billed in advance for Vision and Vision CB accounts. Total Clarity will pro-rate a flat fee for the first quarter based on (the number of days the account is open) / (the total number of days in the quarter) multiplied by the fee. We will also refund any flat fees paid in advance a pro-rated portion based on the fee multiplied by (the number of days the account was open) / (number of days in the quarter) if an account is closed.

At the discretion of the Advisory Representative, all accounts from one household are added together to obtain a higher total of account values* for fee calculations. In this way, your annual asset management fee will then be lower if a breakpoint is reached, since it is based on an aggregate value* of all accounts within your household, than if the fee for each account was calculated independently of the other accounts. This practice varies by Advisory Representative, so you could pay more or less for management services depending on the Advisory Representative with whom you work.

*Account values in the Orion reporting system will be used for Total Clarity's quarterly fee calculations for advisory accounts. *The custodian account values will be used for quarterly fee calculations for Vision CB accounts*. Although account holdings and asset valuations should generally match, month-end market values reflected in Orion's reporting system sometimes differ from those provided by the custodian on their month-end statements. The three most common reasons why these values may differ are (i) differences in the manner in which accrued interest is calculated, (ii) differences in the date upon which "as of" dividends and capital gains are reported, and (iii) differences in whether settlement date valuations or trade date valuations are used. If you have any questions or believe there are material discrepancies between your custodial statement and Orion's reporting system, please contact Total Clarity at (630) 762-9352. You may request a copy the Orion report valuations from your Total Clarity Advisory Representative.

If your account has securities that are excluded from billing ("Excluded Securities"), the market value for the Excluded Securities is deducted from the account's total market value before the fees are calculated.

<u>Closing an Account (refund of fees)</u>: Since fees are billed in advance, Total Clarity will refund to the client a portion of the final fee which was collected from the advisory account(s). Details regarding final fee calculations and refunds can be found under "Termination of a Total Clarity Vision or Vision CB Account." (See Note above for flat rate fees.)

Examples of the maximum fee calculation for all management programs is shown below:

- Fee calculation "First Next Next" billing example for a**Total Clarity Vision & Vision CB Account** valued at $1.2 million:
  (Amount x Rate % = Annual Fee)

Amount	**Rate %**	**Annual Fee**
First $50,000	2.75	$1,375.00
Next $50,000 ($100,000 – $50,000 = $50,000)	2.75	$1,375.00
Next $150,000 ($250,000 – $100,000 = $150,000)	2.75	$4,125.00
Next $250,000 ($500,000 – $250,000 = $250,000)	2.50	$6,250.00
Next $500,000 ($1,000,000 – $500,000 = $500,000)	2.00	$10,000.00
Next $200,000 ($1,200,000 – $1,000,000 = $200,000)	1.75	$3,500.00
Example Annual Fee: Example Quarterly Fee for Total Clarity Vision or Vision CB Accounts: ($26,625.00 multiplied by number of days in the quarter/ number of days in the year).		$26,625.00 $6,656.25

- Fee calculation "breakpoint" example for a **Total Clarity Vision CB Account** with a total of all Total Clarity Accounts valued at $1.2 million:
  (Amount x Rate % = Annual Fee)

A household with a total balance of all Total Clarity advisory accounts of $1,200,000 on the breakpoint fee schedule would be billed at 1.75% per year. The total annual fee is $21,000 ($1,200,000 * 1.75%) and the quarterly billing (for a 90-day quarter) is $5,178.08. The quarterly calculation is: ($21,000 / 365 days) * 90 days.

<u>*Costs Associated with a Wrap Fee Account*</u>
The *Total Clarity Vision* and *Total Clarity Vision CB Account* programs at times will cost the client more or less than if the client purchased services separately. Costs that affect the services if obtained separately or that the client is able to control if services are purchased separately include trading costs and the asset management fee. Additionally, clients are advised that a wrap fee account, as compared with a traditional commission-based account, will be more costly to the client during periods when trading activity is less. Consequently, clients find that maintaining the wrap fee account can result in a higher annual cost. During periods when trading activity is heavier, such as when the account is first opened and during periods of increased market movements, wrap fee accounts will result in lower annual costs than a brokerage account.

Current business practices of the custodians we use has led to the reduction or elimination of many transaction charges (commissions). Therefore, our commission costs for trading in certain types of securities within the wrap fee program have been reduced or eliminated which means we retain a larger portion of the advisory fee we charge you, depending on the types of securities transacted in your account. This presents a conflict of interest as we have not reduced our fees to you in conjunction with these savings. We have no way of predicting how the custodian will assess transaction costs in the future, and trading costs may be higher or lower. We believe our wrap fee is fair and reasonable based on the services we provide and the advice we deliver.

<u>*Additional Fees & Transaction Charges*</u>
In addition to the advisory fee, you will also pay fees for custodial services, account maintenance fees, taxes, and other fees associated with maintaining the account. For all qualified accounts held at LPL Financial, a $40 annual IRA maintenance will be charged. Annual IRA maintenance fees are not charged by Schwab. Total Clarity and its Advisory Representatives do not control or share in any portion of such fees.

Furthermore, the client will pay fees to the mutual fund company from which they were purchased. Such fees are compensation to the fund manager and are not shared with Total Clarity Wealth Management. Total Clarity offers a wide range of mutual funds at both LPL and Schwab. Institutional Advisory share classes (share classes that do not pay 12b-1 fees) of mutual funds are typically charged a higher transaction fee for purchases and sells of these products. However, these funds have lower expenses and therefore should result in being a lower cost to the customer, but this varies for each fund. LPL offers some of these advisory share class mutual funds and Schwab offers some Exchange Traded Funds (ETFs) with no transaction fees which results in a conflict of interest for your Advisory Representative to purchase these specific funds to save himself the transaction fee for a Vision Account. Schwab charge no transaction fees for ETFs and exchange traded equities and a standard, non-discounted fee for OTC equities.

Although clients do not pay a transaction charge for transactions in Vision or Vision CB accounts, clients should be aware that your Advisory Representative would cover these charges. The transaction charges paid by your Advisory Representative vary based on the type of security (ex. mutual fund, equity, or ETF) and for mutual funds the charge is based on whether or not the mutual fund pays 12b-

1s fees and/or recordkeeping fees to the custodian. Transaction charges paid by your Advisory Representative for mutual funds range from $0 - $26.50/ transaction which, therefore, results in a conflict of interest since the Advisory Representative would consider this cost when deciding which securities to select and how frequently to place transactions in a Vision or Vision CB account. Mutual fund A share classes typically have a lower or no transaction charge, so to help mitigate the conflict of interest in selecting a share class and since 12b-1s fees for accounts held at Schwab or LPL cannot be refunded, Total Clarity as a general policy has Advisory Representatives use only non-12b-1 paying share classes, unless clients are better served with another share class. Advisory Representatives must select the share class that is in your best interest.

Some custodians also charge a foreign Transaction Tax on certain foreign equity security purchases. This tax is levied by the foreign government and is used to offset the tax incurred by the custodian as a result of executing the transaction on your behalf. At account opening, you will receive notification from your custodian about miscellaneous fees and charges they impose for certain transactions (such as wire or overnight fees). You should keep this documentation for your records.

LPL Financial and Schwab will also charge a $50 fee when purchasing Alternative Investments within Total Clarity accounts as well as an annual holding fee of between $35 and $250 per Alternative Investment. These fees will not be refunded back to the account since these holdings are not part of the wrap fee program and are not included in billing calculations. Total Clarity receives no portion of any of the above fees.

Separately Managed Programs

Manager Access Select (MAS)

The Account Fee for Manager Access Select Accounts includes all fees and charges for the services of SMA Portfolio Manager or Model Advisor, LPL, and Total Clarity including brokerage commissions for transactions effected through LPL. Client understands that the Advisory Parties, in connection with the performance of their respective services, shall be entitled to and will share in the Account Fees payable hereunder. The SMA Portfolio Manager or Model Advisor will receive the Manager Fee which ranges from 0% - 0.60%. The Advisory Fee has a maximum of 1.75%, For MAS accounts the SMA Portfolio Manager fee is charged separately from the Advisory Fee. The total Maximum Annual Account Fee is 2.35%.

Optimum Market Portfolios (OMP)

The maximum flat Advisory Fee will not exceed 1.75%. Upon request, the Advisory Fee may be structured on a tiered basis, with a reduced percentage rate based on reaching certain thresholds.The Account Fee is charged for the asset management services of LPL and Total Clarity, as well as the administrative and custodial services of LPL. The Account Fee is negotiable and is based on the value of the assets in the Account, including cash holdings, and payable quarterly in advance.

Model Wealth Portfolios (MWP)

The Advisory Fee is charged for the investment advisory services of Total Clarity, as well as the investment advisory, administrative, trading, custodial and clearing services of LPL. The maximum flat Advisory Fee is 1.75% but may be higher if a tiered schedule is used that has higher percentages for lower tiers. Depending upon the model(s) selected for the account, clients pay a Manager Fee set by LPL for the use of each model portfolio. The Manager Fee is based on the value of the assets in the account, including cash holdings, and payable quarterly in advance. This fee ranges from 0% to 0.60% and is in addition to the Advisory Fee. Therefore, the Maximum Total Account Fee would be 2.35%

Clients should consider the level and complexity of the advisory services to be provided when negotiating the account fee (or the advisor fee portion of the account fee, as applicable) with Total Clarity. For accounts utilizing third-party portfolio managers under aggregate, all-in-one account fee structures (including MAS, OMP & MWP fee structure), Total Clarity has a financial incentive to select one portfolio instead of another portfolio because the portion of the account fee retained by Total Clarity varies depending on the portfolio strategist fee associated with a portfolio.

Please refer to the relevant LPL Form ADV program brochure for a more detailed discussion of conflicts of interest.

Alternative Investments
Transaction charges and annual holding fees for alternative investments such as REITs, Business Development Companies (BDCs), and private equities will be charged to the account, as they are being held in the account as a courtesy to the client and are not considered part of the Wrap Fee Program. Your Advisory Representative will receive commissions through LPL for the purchase of Alternative Investments that are held in the account.

Variable Annuities
For variable annuities held within Total Clarity accounts, there is no sales charge that is paid to your Advisory Representative upon purchase of the annuity. All expenses or charges, such as mortality & expense charges and fees for any riders related to the variable annuity are pulled directly from the variable annuity. These fees typically vary between 0.30% and 1.50% annually and are pulled quarterly or annually depending on your contract and are in addition to the advisory fee. Total Clarity receives no portion of these amounts. Please see your Variable Annuity contract for a list of these fees. Variable products are complex products with higher internal expenses compared to other securities products and are therefore more expensive.

Commissions & Sales Charges
Some Advisory Representatives of Total Clarity are also Registered Representatives of LPL Financial, a registered Broker/Dealer, member of FINRA (Financial Industry Regulatory Authority) and SIPC (Securities Investor Protection Corporation). Load and certain no-load mutual funds pay annual distribution charges, sometimes referred to as 12b-1 fees. 12b-1 fees come from fund assets, therefore, indirectly from your assets. Since neither Schwab nor LPL Financial refund 12b-1s into Total Clarity accounts, it is recommended that mutual fund share classes that pay 12b-1s not be held in Total Clarity accounts at these custodians unless there is no comparable non 12b-1 paying share class available.

Your Advisory Representative will receive commissions through LPL for the purchase of Alternative Investments that are held in the account. Alternative investments typically pay a higher commission than other securities products. Therefore, there is an incentive to recommend alternative investments over other securities products. This is a conflict of interest. Further, total compensation received by advisory representatives including commissions and advisory fees on the other holdings in the account could approach or exceed 3%, which is considered excessive by industry standards. To mitigate this conflict of interest you are informed of these conflicts.

Total Clarity receives no portion of the above-mentioned 12b-1 fees or commissions from Alternative Investments. You are able to purchase the securities recommended by Total Clarity directly or through other brokers or agents not affiliated with Total Clarity for a similar or lower cost.

Termination of a Total Clarity Vision or Vision CB Account
In the event an account is closed, the advisory fee will be calculated based on the value of the account on the date the fees were assessed, and the termination date (or the date the assets were transferred out of the account). The fee charged will be a pro-rata portion of the advisory fee for the quarter up to the date assets are transferred out of the account (termination date). This is equal to (the number of days the account was open) / (number of days in the quarter) multiplied by the fee for the full quarter. Any refund due will be calculated based on the fee previously paid for the quarter minus the pro-rata fee described above. Refunds will be credited to the account from which the management fees were pulled, or a check will be mailed to the client's address of record. We will also refund any flat fees paid in advance a pro-rated portion based on the fee multiplied by (the number of days the account was open) / (number of days in the quarter).

The Vision and Vision CB Account Agreements can be terminated by either party upon receipt of written or verbal notice of termination. Termination by a Client is effective upon receipt of the notice by Total Clarity unless a specific date is requested in the notice. You may terminate the agreement without penalty within 5 days of signing the account agreement. If you terminate an account(s) within the first calendar year after opening the account(s), you will be charged a $200 administrative fee which will be deducted from any refund of fees. This fee can be waived at Total Clarity's sole discretion. This fee is not charged on accounts that are closed due to a transfer of the assets to another Total Clarity account. This fee will be paid in the same manner as the Asset-Based Fee, or an invoice will be sent to the client if the assets are no longer in the account. After one calendar year, if an account is terminated, Total Clarity will refund any advisory fees charged in advance based on a pro-rata calculation, as described above.

Upon termination, early redemption fees or similar fees for mutual funds or other products held in the account will be applicable as described in the fund's prospectus. Some broker-dealers will not accept certain assets that are held in your account. Total Clarity will use reasonable efforts to follow your instructions regarding the disposition of the assets in your account to the extent permitted by law and policies of the firm. Please Note: Total Clarity will discontinue billing after the date specified in the termination notice even if the assets are still in the account, but Total Clarity and our Advisory Representatives have no fiduciary responsibilities for the account once the Total Clarity Agreement has been terminated.

Conflicts of Interest
Advisory Representatives recommending clients participate in the *Total Clarity Vision or Vision CB Account* programs will receive compensation as a result of a client's participation in the program. The amount of compensation paid to Total Clarity Wealth Management and the Advisory Representative could be more than what Total Clarity and the Advisory Representative would have received if the client participated in other programs available through another broker/dealer or paid separately for investment advice, brokerage and other services. Clients are advised that Advisory Representatives have a financial incentive to recommend a wrap fee program (i.e., *Total Clarity Vision Account* or *Total Clarity Vision CB Account*) over other programs or services.

LPL covers costs for certain trainings and conferences, including travel, accommodations, and conference fees, based on production. You are advised there is an incentive for Total Clarity and your Advisory Representative to recommend LPL over other Broker/Dealers based on the products and services that they will receive rather than your best interest.

These products and services are provided to Total Clarity as part of its overall relationship with LPL Financial and Schwab. While as a fiduciary Total Clarity endeavors to act in its clients' best interests, the receipt of these benefits creates a conflict of interest because Total Clarity's recommendation that clients custody at one of these custodians is based in part on the benefit Total Clarity received from these services and products and not solely on the nature, cost or quality of custody or brokerage services provided by LPL or Schwab. Total Clarity's receipt of some of these benefits is based on the amount of advisory assets custodied at each of these platforms.

Total Clarity and Advisory Representatives buy and sell securities for themselves that are also recommended and bought or sold for Clients. Total Clarity Wealth Management, its officers, employees and Advisory Representatives are directed to not trade ahead of clients or trade in such a way as to obtain a better price for themselves than for clients.

To mitigate these conflicts of interest, this disclosure has been provided to you. If you have any concerns about the appropriateness of your Advisory Representative's recommendations based on your financial situation, you should discuss these recommendations with another financial professional.

Item 5 ACCOUNT REQUIREMENTS & TYPES OF CLIENTS

Minimum Account Size
Total Clarity requires a minimum amount of assets to be held in an account for the purpose of obtaining asset management services. A minimum deposit of $10,000 (cash or securities) to a brokerage account is necessary in order to participate in investment advisory services.

However, under certain circumstances, Total Clarity waives the minimum investment size requirement and accepts clients with less than $10,000. Such circumstances include but are not limited to, situations in which additional assets will soon be deposited; or when the client has other accounts with Total Clarity since the consolidation of these accounts for the purposes of quarterly fee calculations would bring the value of the accounts closer to a fee schedule breakpoint, or the client has expressed a desire to have all of their accounts in the same program and custodian.

Smaller accounts are defined as accounts holding less than $25,000 in assets. Clients are advised that performance will be affected more in these accounts due to the difficulties with diversifying smaller accounts and risk controls being compromised. Performance of smaller accounts varies from the performance of accounts with more dollars invested because fluctuations in the market have a greater impact.

Total Clarity Wealth Management does not represent, warrantee or imply that the services or methods of analyses used by Total Clarity can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to major market corrections or crashes. No guarantees can be offered that a client's goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Total Clarity Wealth Management will provide a better return than other investment strategies.

Clients
Total Clarity's generally offers the Total Clarity Vision and Vision CB Account programs to individuals and high net worth individuals, trusts, estates, charitable organizations, corporations or other business entities.

Item 6 PERFORMANCE-BASED FEES

This section is not applicable to Total Clarity since Total Clarity does not charge performance based fees.

Item 7 TYPES OF CLIENTS

Total Clarity's services are geared toward individuals and high net worth individuals, trusts, estates, charitable organizations, corporations or other business entities.

The minimum investment required in the Total Clarity Asset Management Program is generally $10,000 for investment advisory accounts. Accounts below these minimums will be accepted on an individual basis at our discretion. Such circumstances include, but are not limited to either additional assets will soon be deposited or the client has other accounts with Total Clarity. You should be aware that in smaller accounts, performance will suffer due to difficulties with diversification of assets and risk controls being compromised.

Item 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

8 A. Total Clarity's Advisory Representatives (IARs) act as portfolio managers for their advisory clients. In that role, they use various investment strategies to reach the Clients' goals and manage investment risk by conducting economic analyses and attempting to identify relevant market trends. Additionally, IARs conduct fundamental analyses, which generally involves assessing a company's or security's value based on factors such as sales, assets, cash flow, market position, expected growth, management, products and services, earnings, and financial structure.

As stated in Item 4 of Total Clarity ADV 2A, IARs are independent contractors of Total Clarity and each IAR has their own method of analysis and philosophy of management. There is no one method or analysis that can predict future market events or will prevent loss. The experience and level of education of IARs varies and the type of management style varies. Therefore, investment performance and asset allocations will vary. Some IARs use software and investment analyzing tools that include projections of returns based on historical information and speculate future tax, educational expense, social security, etc. conditions, payments, and costs. These systems are a guideline only and cannot be relied upon to provide complete accuracy or assurances. Your account can also be based on a portfolio model provided through the custodian. These models have the ability to be modified by your Advisory Representative who can use the model for a portion of the account or for all of the account. These models are a guideline and are managed by a third party, but your Advisory Representative is the one who makes all decisions and trades. Advisory Representatives can also use Separately Managed Accounts which are managed by LPL Financial or a third-party manager or firm. Internal costs for the holdings in these model portfolios could be higher than for other available mutual funds or ETFs.

Investment strategies are also used by IARs to strive to improve the performance and balance the risk of an account. Asset allocation is one of the strategies all Advisors use to attempt to optimize the risk and reward of your portfolio by investing among several asset classes. However, it cannot prevent or insulate a portfolio from market fluctuations or risk.

While not a standard analysis method used by our Advisors, some Advisors offer services that attempt to time security performance. This essentially means they try to purchase or sell immediately preceding an increase or decrease in a security's price. This type of investing can substantially increase the amount of your brokerage transaction costs due to a higher trading frequency. Also, many mutual funds or variable annuities prohibit excessive trading within their fund in a short period of time. Total Clarity monitors client accounts for excessive trading as well as to ensure investments are appropriate for each client.

8 B. It is important to understand that investing in securities involves risk of loss, including the possible loss of the principal money you are investing. Therefore, your participation in any of the management programs offered by Total Clarity requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts. The market values of investments are subject to fluctuations based on market conditions.

We do not represent, warrantee or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by Total Clarity, or our Advisory Representatives will provide a better return than other investment strategies.

The table below describes some of the risks associated with most types of investing, followed by in 8 C, some investment products used in our advisory programs and have risks unique to that particular investment:

Management Risk	The services we offer involve your Advisor developing and implementing an investment strategy for you. A profitable investment strategy inherently involves making decisions about the future behavior of the securities markets as a whole as well as markets for individual securities. Because there is no available method to accurately predict future market behavior, there is no guarantee that any specific investment strategy will be successful.
Market Risk	This is the risk that the value of any security could go up or down at any time due to factors affecting securities markets in general or particular industries.
Interest Rate Risk	This risk affects fixed income securities which can decline in value because of an increase in interest rates; a bond or fund with a longer duration will be more sensitive to rate fluctuations.
Credit Risk	This is the risk that an investor could lose money if the issuer of a fixed income security is unable or unwilling to meet its financial obligations.
Concentrated Investment Strategy Risk	Certain investment strategies are concentrated in a specific sector or industry. Portfolios using this strategy are more likely to sharply increase or decrease in value with changes in the market. Concentrated strategies are more volatile because the risk associated with each company or sector represents a large percentage of your overall portfolio value.

8 C. The following are types of investments and related risks that Total Clarity Advisors use in client portfolios:

***Mutual Funds*:**	The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of fund managers and/or the fund straying from its stated investment objective. Open ended mutual funds do not typically have a liquidity issue, and the price does not fluctuate

	throughout the trading day. Interval funds are also used in Total Clarity accounts.
Interval Funds:	These are a type of mutual fund product that traditionally invests in real estate. Interval Funds have limited liquidity and could have periods of no liquidity. These funds will typically offer to repurchase (or buy back) a portion of shares from shareholders pursuant to restrictions noted in the prospectus. Such restrictions may be a limited buy back percentage, specific timeframes to make redemptions, applicable redemption fees or ability by the sponsor company to deny redemption requests, therefore, they are considered to have a higher risk and reduced liquidity. Mutual fund fees and interval fund fees are described in the fund's prospectus, which will be mailed or emailed directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's web site. At the client's request, Total Clarity will direct the client to the appropriate web page to access the prospectus.
Equity Securities	In general, prices of equity securities are more volatile than fixed income securities and respond to a number of factors that can affect entire financial markets or industries.
Options:	Certain types of option trading are permitted in order to generate income or hedge a security; namely, the selling (writing) of covered call options or the purchasing of put options on a security. The use of options involves additional risks. The risks of covered call writing include the possibility for the market to rise sharply and the security could get called away. The risk of buying long puts is limited to the loss of the premium paid for the put if the option is not exercised or otherwise sold.
Exchange-Traded Funds (ETFs)	The shares of an ETF commonly represent an interest in a portfolio of securities that track an underlying benchmark or index. A leveraged ETF generally seeks to deliver multiples of the daily performance of the index or benchmark that it tracks. An inverse ETF generally seeks to deliver the opposite of the daily performance of the index or benchmark that it tracks. Inverse ETFs often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some ETFs are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse ETFs use a range of investment strategies, including swaps, futures contracts and other derivative instruments. ETFs (including leveraged, inverse, and leveraged inverse) trade on an auctionable market. Therefore, there is more price fluctuation with ETFs than with mutual funds since ETFs trade throughout the day, whereas mutual funds are priced once a day. Also, since most ETFs only mirror a market index, such as the S&P 500, they won't outperform the index. A significant amount of principal could be lost in these securities rapidly and tax laws could change and affect the tax treatment of this investment.

Exchange-Traded Funds (ETFs) continued	Traditional ETFs are generally not actively managed. This means that securities in the portfolio will not be purchased or sold in attempt to take advantage of changing market conditions. A traditional ETF continues to hold securities even though their market value and dividend yields have changed. An ETF generally carries the same investment risk as the portfolio of securities within the ETF. Securities in a portfolio can depreciate, and the ETF does not achieve its intended objective. In addition, each ETF is subject to specific risks that vary depending on each ETF's investment objectives and portfolio composition. Additionally, while premiums and discounts from net asset value ("NAV") are generally small among ETFs, there is a risk for severe dislocation from NAV. The use of leverage in an investment portfolio can magnify any price movements, resulting in high volatility and significant loss of principal. ETFs do not track the underlying Index due to imperfect correlation between the ETF's portfolio securities and those in the underlying Index, rounding prices, changes to the underlying Index and regulatory requirements. This risk is heightened during times of increased market volatility or other unusual market conditions. Tracking error also results because the ETF incurs fees and expenses while the underlying Index does not.
Exchange-Traded Funds (ETFs) continued	Non-traditional ETFs, including leveraged and inverse ETFs, are not suitable for most investors. Non-traditional ETFs are trading vehicles in which daily rebalancing and market volatility have a significant impact on the realized return. The effects of mathematical compounding can grow significantly over time, leading to scenarios whereby performance over the long run can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. Leveraged, inverse, and leveraged inverse ETFs are more volatile and riskier than traditional ETFs due to their exposure to leverage and derivatives, particularly total return swaps and futures. In addition, these instruments are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis. Holding leveraged, inverse, and leveraged inverse ETFs for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Non-traditional ETFs are volatile and not suitable for all investors. Positions in non-traditional ETFs should be monitored closely due to their volatile nature and inability to track the underlying index over an extended period of time. Non-traditional ETFs are not intended to be held long term. ETFs over a period longer than one day can differ significantly from their stated performance objectives. Some ETFs are thinly traded which could impact the ability to sell shares quickly. Non-traditional ETFs and futures-linked ETFs enter into total return swaps with a counter party. If the counterparty becomes unable to deliver its share of the contract, it will default on the swap, therefore negatively affecting the value of the non-traditional ETFs. Some ETFs may include digital assets. The investment characteristics of Digital Assets generally differ from those of traditional securities, currencies, commodities. Digital Assets are not backed by a central bank or a national,

	international organization, any hard assets, human capital, or other form of credit and are relatively new to the marketplace. Digital Assets are market-based: a Digital Asset's value is determined by (and fluctuates often, according to) supply and demand factors, its adoption in the traditional commerce channels, and/or the value that various market participants place on it through their mutual agreement or transactions. The lack of history to these types of investments entail certain unknown risks, are very speculative and are not appropriate for all investors.
Structured Products:	Used less frequently, structured products are securities derived from another asset such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Depending upon the underlying asset or product, there can be different risks associated with the product. An investor in a structured product never has a claim on the underlying investment. There may be little or no secondary market. Tax treatment may be different than other investments. Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.
Alternative Investments:	Non-traded Real Estate Investment Trusts (REITs), non-traded Business Development Companies (BDC's), limited partnerships, and direct alternatives are subject to various risks such as limitations on liquidity (can take 30 days or more to liquidate), pricing mechanisms, and specific risk factors associated with the particular product, which for products associated with real estate, would include but not limited to, property devaluation based on adverse economic and real estate market conditions. Redemption can be at more or less than the original amount invested. As a result, they are not suitable for all investors. A prospectus that discloses all risks, fees and expenses, and risk factors, will be provided by your Advisor. Please read the prospectus carefully before investing. Investors considering Alternative Investments should understand that they are generally considered speculative in nature and involve a high degree of risk, particularly if concentrated within one industry. These risks are greater and substantially different than those associated with traditional equity or fixed income investments. The products are risky and for sophisticated investors only who meet qualified investor requirements. Further, these products are sold on a commission basis through a broker/dealer. Therefore, IARs will receive commissions, and such commissions are higher than other securities products. This is a conflict of interest. To mitigate this conflict of interest we are informing you of this information and encourage you to read offering memorandums.
Variable Annuities	For variable annuities held within Total Clarity accounts, your variable annuity contract has exclusions, limitations, reductions of benefits and terms under which the contract will be continued in force or be discontinued. Be sure to discuss costs and the complete details of coverage with your Advisor. Guarantees of the annuity are backed by the financial strength of the underlying insurance company. Investment sub-account value will fluctuate with changes in market conditions. As stated above, variable products are complex products with higher costs. Further, variable products

	pay higher commissions than other securities products. This creates a conflict of interest. To mitigate this conflict of interest we only allow advisory class Variable Annuities to be held in Total Clarity accounts. These variable annuities do not pay commissions to your Advisory Representative, but Variable Annuities purchased outside of your Total Clarity agreement through your Advisory Representative do pay higher commissions than other security products. This creates a conflict of interest for your IAR to sell you a Variable Annuity that is not part of your Total Clarity account. To mitigate this conflict of interest we encourage you to read the offering memorandum for any variable annuity you purchase and are informing you of this information.

Item 9 ADDITIONAL INFORMATION

Disciplinary Information & other Financial Industry Activities & Affiliations
There is no reportable disciplinary information required for Total Clarity or its management persons that is material to your evaluation of Total Clarity, its business or its management persons.

Total Clarity does not have a related person who is a: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser, futures commission merchant or commodity pool operator; banking or thrift institution; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership. We do have an affiliated person who is a lawyer, and one who is a CPA. You are under no obligation to use these services. The three principal owners of Total Clarity also own an advisor services company which recruits, trains, supports and supervises representatives of LPL Financial. One of the principal owners is also an owner of an accounting and tax practice, Exemplar Accounting and Tax Advisors, Inc. (EATA). Advisory Representatives refer clients to EATA, which results in a conflict of interest, whereby an owner benefits from clients utilizing services of both companies. You are under no obligation to purchase accounting services through EATA.

Certain Advisory Representatives are dually registered as Advisory Representatives of Total Clarity and as Registered Representatives of LPL. LPL is independently owned and operated and is not affiliated with Total Clarity. You are under no obligation to purchase or sell securities through your Advisory Representative. However, if we develop a financial or retirement plan for you and you choose to implement the plan with our assistance, commissions on brokerage business will be earned in addition to any fees you paid for the other advisory services. Commissions could be higher or lower at LPL than at other broker/dealers. Advisory Representatives will have a conflict of interest in having you purchase securities and/or insurance related products through LPL in that the higher their production with LPL the greater the potential for obtaining a higher payout on commissions earned.

Under the rules and regulations of FINRA, LPL has an obligation to perform supervisory functions regarding certain activities engaged in by Advisory Representatives who are also Registered Representatives of LPL. Additionally, certain of our Advisory Representatives are also Advisory Representatives with LPL. This is only allowed under limited exceptions. Due to these relationships with LPL, LPL Financial will have access to certain confidential information such as financial information, investment objectives, transactions and holdings, about Total Clarity's clients, even if the client does not establish an account through LPL. If you would like a copy of the LPL Financial Privacy

Policy, please contact Total Clarity's Home office at 630-762-9352 LPL will receive a portion of our advisory fees from our clients' accounts that are held at Schwab. There is no affiliation between Total Clarity and LPL or Schwab.

Advisory Representatives are licensed with various insurance companies. This is a conflict of interest since your Total Clarity adviser will earn commissions if you purchase insurance products through them. You are under no obligation to purchase insurance products or services through your Advisory Representative.

Total Clarity does not recommend the services of Third Party Money Managers.

Total Clarity attempts to mitigate the conflicts of interest relating to the receipt of commissions by providing you with these disclosures.

Code of Ethics

Total Clarity has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. Total Clarity takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. We strive to handle your non-public information in such a way as to protect it from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy which details our procedures for handling your personal information.

Total Clarity maintains a Code of Ethics for its Advisory Representatives, supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violation reporting requirements, and safeguarding of material non-public information about your transactions. Our Code of Ethics establishes our firm's expectation for business conduct. A copy of our Code of Ethics will be provided to you upon request.

Neither Total Clarity nor its associated persons recommend buys or sells for client accounts any securities in which they have a material financial interest. Total Clarity and its associated persons buy or sell securities identical to those securities recommended to you. They will not put their interests before your interest. Total Clarity and any associated person are directed to not trade ahead of you or trade in such a way as to obtain a better price for themselves than for you or other clients.

Total Clarity is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. Total Clarity and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Review of Accounts

As part of the Total Clarity Vision and Vision CB Account programs, your accounts will be reviewed at least quarterly and you will be contacted not less than annually for a review meeting. You are advised that you must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes will require him to review the portfolio allocation and make recommendations for changes. Each Advisory Representative is responsible for ensuring timely reviews and suitable recommendations. The level of experience of Advisory Representatives will vary.

You will be provided statements at least quarterly directly from the custodian. These reports are provided from Schwab or from LPL Financial, depending on where your account is held. Additionally, you will receive confirmations of all transactions that occur within your account directly from Schwab or from LPL. If contracted, Total Clarity provides a report every quarter showing all holdings within each account, along with performance data for each account beginning either on 01/01/12, or from the date of its inception, if the account was opened after that time. This is due to a change of reporting systems to Morningstar Office. Total Clarity uses Orion Advisor for reporting as of 02/01/21. *Total Clarity does not provide these reports to Vision CB accounts.*

You should compare the report you receive from Total Clarity with statements received from the account custodian. Should there be any discrepancy between reports, the account custodian's report will prevail.

Client Referrals & Other Compensation

Product vendors recommended by Total Clarity provide monetary and non-monetary assistance with client events in addition to providing educational tools and resources. Advisory Representatives do not select products as a result of any monetary or non-monetary assistance. Total Clarity's due diligence of a product does not take into consideration any assistance it receives. The suitability and quality of a product for our clients is of first and foremost importance.

Total Clarity can enter into solicitor arrangements pursuant to which it compensates third-party intermediaries for client referrals that result in the provision of investment advisory services by Total Clarity. Total Clarity will disclose these solicitation arrangements to affected investors, and any cash solicitation arrangements will comply with Rule 206(4)-1 of the Advisers Act. Solicitors introducing clients to Total Clarity may receive compensation from Total Clarity, such as a retainer, a flat fee per referral and/or a percentage of introduced capital or of the advisory fee prior to payment to the Advisory Representative. Such compensation will be paid pursuant to a written agreement with the solicitor and generally may be terminated by either party from time to time. The cost of any such fees will be borne entirely by Total Clarity and not by any affected client.

Custody

The account custodian will directly debit your account(s) for the payment of our advisory fees. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from the account custodian will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy.

Standing Letter of Authorization

When requested, our firm, or Advisory Representatives, will effect ACHs from client accounts to one or more third parties designated, in writing, by the client without obtaining written client consent for each separate, individual transaction, as long as the client has provided us with written authorization to do so. Such written authorization is known as a Standing Letter of Authorization. An adviser with authority to conduct such third party transfers has access to the client's assets, and therefore has custody of the client's assets in any related accounts.

However, we do not have to obtain a surprise annual audit, as we otherwise would be required to by reason of having custody, as long as the following criteria are met:

1. You provide a written, signed instruction to the qualified custodian that includes the third party's

name and address or account number at a custodian;
2. You authorize us in writing to direct transfers to the third party either on a specified schedule or from time to time;
3. Your qualified custodian verifies your authorization (e.g., signature review) and provides a transfer of funds notice to you promptly after each transfer;
4. You can terminate or change the instruction;
5. We have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party;
6. We maintain records showing that the third party is not a related party to us nor located at the same address as us; and
7. Your qualified custodian sends you, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

When we engage in third party standing letters of authorization, Total Clarity complies with the conditions of the safe harbor provisions and is therefore exempt from the annual surprise exam requirement for Advisers that have custody.

Trade Errors
In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, reimbursing the account and/or applying a credit toward future advisory fees.

Class Action Lawsuits
We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

Financial Information
Total Clarity will not require you to prepay more than $1,200 and six or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached. Total Clarity has limited discretionary authority over client accounts; however, that authority does not extend to the withdrawal of any client assets, with the exception of the deduction of Total Clarity's advisory fees from your accounts.

We are financially stable. There is no financial condition that is likely to impair our ability to meet our contractual commitment to you or any other client. Neither Total Clarity nor any of its Advisory Representatives has ever been the subject of a bankruptcy petition.

Other Compensation
Product vendors recommended by Total Clarity provide monetary and non-monetary assistance with client events in addition to providing educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The suitability and quality of a product is of first and foremost importance. Total Clarity's due diligence of a product does not take into consideration any assistance it receives.

In their role as Registered Representatives of LPL Financial, some of our Advisory Representatives will earn commissions. The amount of commissions paid by LPL to the Representative will fluctuate based on overall production. Therefore, the more business placed by them through LPL will enable them to reach another threshold and earn a higher payout.

LPL Financial provides various benefits and payments to Dually Registered Persons that are new to the LPL Financial platform to assist the representative with the costs (including foregone revenues during account transition) associated with transitioning his or her business to the LPL Financial platform (collectively referred to as "Transition Assistance"). The proceeds of such Transition Assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, providing working capital to assist in funding the Dually Registered Person's business, satisfying any outstanding debt owed to the Dually Registered Person's prior firm, offsetting account transfer fees (ACATs) payable to LPL Financial as a result of the Dually Registered Person's clients transitioning to LPL Financial's custodial platform, technology set-up fees, marketing and mailing costs, stationary and licensure transfer fees, moving expenses, office space expenses, staffing support and termination fees associated with moving accounts.

The amount of the Transition Assistance payments is often significant in relation to the overall revenue earned or compensation received by the Dually Registered Person at the prior firm. Such payments are generally based on the size of the Dually Registered Person's business established at the prior firm and/or assets under custody with LPL Financial. There is a conflict of interest for representatives to select a broker/dealer based on the amount of transition assistance to be received. Furthermore, LPL Financial provides the transition assistance in the form of a forgivable note. The transition assistance dollars are forgiven over a five year period based on the representative remaining with LPL Financial. Therefore, there is a conflict of interest for the representative to remain with LPL Financial when it is not in the best interests for clients because of the forgivable note period having not expired.

Additionally, owners of Total Clarity received compensation from LPL Financial for total assets placed with LPL, this has been provided to the owners in the form of a forgivable note that is forgiven over a period of five years. This is a conflict of interest since it encourages the owners to influence their representatives to move assets to LPL Financial and to remain registered with LPL for a period of five years.

LPL Financial also rewards representatives for achieving production thresholds by covering expenses to various conferences and offering award conferences. This is considered a conflict of interest.

Total Clarity and your Advisory Representative attempt to mitigate any conflicts of interest by evaluating and recommending that clients use LPL services based on the benefits that each service provides to their clients, rather than to the Transition Assistance earned by them. We also try to mitigate the risks by having multiple choices in where to custody your accounts. Lastly to help mitigate the conflicts of interest, this disclosure has been provided to you.

If you have any concerns about the appropriateness of your Advisory Representative's recommendations based on your financial situation, you should discuss these recommendations with another financial professional.

Item 10 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

This section is not applicable to Total Clarity. Total Clarity is not state registered. Total Clarity is registered with the Securities and Exchange Commission.

Should you have any questions regarding our Wrap Fee Brochure or any other document you have received from Total Clarity, please speak with your Advisory Representative.