



## Firm Brochure

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*This brochure provides information about the qualifications and business practices of Jenkins Wealth, an investment adviser registered with the United States Securities and Exchange Commission ("SEC"). Registration does not imply a certain level of skill or training but only indicates that Jenkins Wealth has registered its business with state and/or federal regulatory authorities, including the SEC. The information in this brochure has not been approved or verified by the SEC or by any state authority.*

*If you have any questions about the contents of this brochure, please contact us at (720) 457-6844 or by email at: [Heather@JenkinsWealth.com](mailto:Heather@JenkinsWealth.com).*

*Additional information about Jenkins Wealth is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Jenkins Wealth's CRD number is: 153241*

## **Item 2: Material Changes**

There are no material changes to this document.

In future filings, this section of the Disclosure Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this Disclosure Brochure on the SEC’s public disclosure website (IAPD) at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

We may, at any time, update this Disclosure Brochure and send a copy to you with a summary of material changes, or a summary of material changes that includes an offer to send you a copy either by electronic means (email) or in hard copy form.

If you would like another copy of this Disclosure Brochure, please download it from the SEC website as indicated above or you may reach us with the provided contact on the cover letter.

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## **Item 4: Advisory Business**

### **A. Description of the Advisory Firm**

Jenkins Wealth specializes in the following types of services: Portfolio Management and Financial Planning. We are committed to providing our Clients with a wide array of investment advisory services. We offer individualized investment analysis and advice to Clients utilizing our firm's Financial Planning and Portfolio Management service, as well as simple Portfolio Management for investments.

Our firm is owned by Jenkins Wealth, Inc., a Colorado Corporation, whose sole shareholder is Bradley R. Jenkins. Our operational hours are Monday – Friday from 9:00 am – 5:00 pm. All meetings are conducted by appointment only.

### **B. Types of Advisory Services**

Our financial Planning and Portfolio Management service encompasses asset management, as well as providing financial planning/financial consulting to Clients. It is designed to assist Clients in meeting their financial goals through the use of various financial investments. We conduct at least one, but sometimes more than one, meeting with a potential Client in order to understand their current financial situation, existing resources, financial goals, and tolerance for risk. Based on what we learn, we propose an investment approach to the Client. We may propose an investment portfolio using our trading methodology, Market Guard™ which consists of various index-based exchange traded funds (ETFs). We may from time to time also consider individual stock, bonds or other securities as well. Depending on a Client's individual situation, we may also recommend the use of Insurance products. (Please see Item 10 for possible conflict of interest). Upon the Client's agreement to the proposed investment plan, we work with the Client to establish or transfer investment accounts so that we can manage the Client's portfolio. Once the relevant accounts are under our management, we review such accounts and positions on an ongoing basis. We may periodically rebalance or adjust Client accounts under our management. If the Client experiences any significant changes to his/her financial or personal circumstances, the Client must notify us so that we can consider such information in managing the Client's investments.

#### ***Portfolio Management Only***

Clients may choose to only participate with a portion of their assets in the Market Guard™ trading strategy and forego any overall financial planning from Jenkins Wealth. If a Client were to choose this path, the Investment Advisory Representative will discuss with the Client the benefits and risks to their portfolio selection before incepting such account(s).

### ***Financial Planning Only***

Financial plans and financial planning may include, but are not limited to investment planning, life insurance; tax concerns; retirement planning; college planning; and debit/credit planning. These services are based on hourly fees and the final fee structure is documented in Exhibit II of the Financial Planning Agreement.

### **Selection of Other Advisers or Money Managers**

Occasionally, Jenkins Wealth may direct Clients to a third-party money manager and/or other Advisers. Before selecting other managers and/or advisors, Jenkins Wealth will make every effort to ensure those other advisors are properly licensed and in good standing.

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

We usually do not allow Clients to impose restrictions on investing in certain securities or types of securities due to the level of difficulty this would entail in managing their account. However, in the rare instance that we would allow restrictions, it would be with special consideration of the Management Team at Jenkins Wealth. If at any time these restrictions were too cumbersome to maintain, Jenkins Wealth reserves the right to terminate the account and/or relationship.

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

Jenkins Wealth does not participate in any wrap fee programs.

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

Jenkins Wealth holds Discretionary Assets Under Management of ***\$166,582,423.00*** as of March 27, 2019

### **Item 5: Fees and Compensation**

#### **Investment Supervisory Services Fees**

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
\$0 - \$999,999	1.50%
\$1,000,000 - \$1,999,999	1.25%
\$2,000,000 +	1.00%

Account fees shall be payable quarterly, in advance, for the upcoming calendar quarter at the annual rates provided above, based upon the corresponding Asset Under Management level. For the first invoice, Clients will be pro-rated for the number of days the assets were on deposit under the advisory control of Jenkins Wealth for the previous quarter, then in advance for the upcoming

quarter. At the beginning of each billing cycle, Jenkins Wealth will determine the appropriate Account Fee based on Total Assets Under Management using the account value at the end of the prior quarter. Account Fees will be automatically adjusted, if necessary, according to the above fee schedule based upon deposits, withdrawals, market appreciation, market depreciation, etc.

For any assets deposited or withdrawn during the current quarter, fees will be assessed at a prorated amount through the end of that current quarter. Advisory fees are withdrawn directly from the Client's account with written authorization.

In the event that you wish to terminate advisory services with Jenkins Wealth, we will refund the unearned portion of our advisory fee to you upon written notification.

Jenkins Wealth has constructive custody over this account for fee billing purposes and has written authorization from the Client to deduct these fees directly from the Client's account. Jenkins Wealth utilizes a custodian who sends at least a quarterly statement showing all debits. These fees are generally non-negotiable.

#### **Financial Planning Fees**

Depending upon the complexity of the situation and the needs of the Client, the hourly fee for these services is between \$250 and \$500. The fees are negotiable, and the final fee schedule will be attached as Exhibit II of the Financial Planning Agreement. If services are terminated prior to completion, Client will be charged on a per hour basis for time put in. These prorated fees are due on the date of termination.

#### **Other Account Fees**

In addition to the advisory fees, Clients may also pay other fees or expenses to third parties or account custodians. Clients will also incur transaction charges for trades executed in their accounts. These transaction fees are separate from our fees and will be disclosed by the firm that the trades are executed through. Also, Clients may pay separately incurred expenses, which we do not receive any part of. These charges are imposed directly by the issuer and shall be disclosed in the fund's prospectus. (i.e. fund management fees and other fund expenses).

#### **Outside Compensation for the sale of securities to Clients**

Neither Jenkins Wealth, nor its supervised persons, accept any compensation for the sale of securities, including asset-based sales charges or services fees from the sale of mutual funds. Jenkins Wealth's supervised persons may also be licensed insurance agents. If deemed appropriate, they will offer Client advice or products from these activities. Clients should be aware that these services pay a commission.

## **Item 6: Performance-Based Fees and Side-by-Side Management**

We do not charge performance-based fees. Clients are only charged fees disclosed in Item 5 above.

## **Item 7: Types of Clients and Account Requirements**

Jenkins Wealth generally provides investment advice and/or management supervisory services to the following types of Clients:

- ❖ Individuals
- ❖ High Net Worth Individuals
- ❖ Trusts, Estates or other Organizations

### ***Minimum Account Size***

As of January 1, 2019, we require a minimum account balance of \$500,000 for our Financial Planning and Portfolio Management service. Generally, this minimum account balance requirement is negotiable and would be required throughout the course of the Client's relationship with our Firm.

Jenkins Wealth, at its sole discretion, may waive its aggregate account minimum based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account compositions or negotiations with the Client).

At any time, a Client may terminate an Account, withdraw all or part of an Account, or update the investment profile, which may initiate an adjustment in the Account's holdings. In that case, unless otherwise directed by the Client, Jenkins Wealth will buy or sell the necessary securities in the Client Account at market prices at or around the time of the termination, withdrawal or update. While Jenkins Wealth seeks to respond to Client deposits, Client changes in risk profiles, Client withdrawal requests, including without limitation requests in connection with terminations, and other reasonable Client requests in a timely and reasonable manner, Jenkins Wealth does not represent and can't guarantee that Jenkins Wealth will respond to any such Client actions or requests immediately or in accordance with a set time schedule.

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

### **A. Methods of Analysis and Investment Strategies**

Jenkins Wealth's primary portfolio management centers around the use of an investment strategy called Market Guard™. The primary functions of Market Guard™ is to monitor the investment positions on an ongoing and active basis, establish potential stopping points, and signal when to

exit the individual investment selections and move them to a position of less volatility by utilizing a series of Technical Indicators for each position.

Market Guard™ utilizes a Tactical Asset Allocation model, which is an active management portfolio strategy that shifts the percentage of assets held in various categories to take advantage of market pricing anomalies or strong market sectors. This strategy provides the opportunity to create extra value by taking advantage of momentum in the marketplace. Market Guard™ is comprised of a blend of technical indicators selected and monitored by Jenkins Wealth. Technical indicators are mathematical calculations based on the price, volume, or open interest of a security or contract. The purpose of utilizing technical indicators, along with fundamental analysis and market observation, is to help provide the basis in order to perform the following important investment decisions:

**When to Sell** –Market Guard™ will assess the individual positions in the portfolio and signal a possible opportune time to divest. Based upon the analysis of current market conditions, we will determine the quantity of shares to sell in an effort to help protect from unnecessary losses and volatility.

**When to Buy** –Market Guard™ will assess the individual positions in the portfolio and signal a possible opportune time to invest. Based upon the analysis of current market conditions, we will determine the quantity of shares to purchase.

**When to Hold** – Market Guard™ will assess the individual positions in the portfolio. If there are no signals to sell or buy particular investment positions, then the strategy will remain unchanged. Based upon the analysis of current market conditions, we will determine the importance to hold the current portfolio allocation.

**Other important aspects that are a part of the overall strategy and design of Jenkins Wealth's portfolio design are:**

### **Intelligent Asset Allocation**

Research shows that asset allocation can be one of the most important factors to influence an overall portfolio. In our opinion, more than 90% of a portfolio's success is determined by asset allocation. Therefore, crucial to the optimal success of a portfolio, is how it's constructed, and when it's rebalanced. Our portfolios take into account both short-term downside risk and potential long-term upside.

### **Monitoring and Rebalancing**

We review and monitor the investments selected inside the portfolios on a daily and a monthly basis. According to our investment discipline, the evaluation period to determine if a rebalance is in order will be conducted based upon the close price of each individual investment position, at



the close of each month. Should a rebalance need to occur, the potential trade dates will be between the 1<sup>st</sup>– 15<sup>th</sup> of the following month.

## **Total Liquidity**

Life's unpredictability demands flexibility. Our portfolios are free from contracts or the use of investment selections that would restrict or limit the ability for a Client to request their funds. This type of portfolio construction is what permits access to your money in the event of unexpected financial obligations, real-time emergencies, or just the desire to access your money. Clients' accounts are held at Charles Schwab.

### **B. Risk Considerations**

Investing in securities involves risk of loss that Clients should be prepared to bear. While the stock market may increase, and your account(s) could enjoy a gain, it is also possible that the stock market may decrease, and your account(s) could suffer a loss. It is important that you understand the risks associated with investing in the stock market. By utilizing our trading methodology, Market Guard™, Jenkins Wealth does strive to mitigate volatility, but it is not a guarantee nor is an automatic stop loss event. Past performance is no guarantee of future results, and any historical returns, expected returns or probability projections may not reflect actual future performance.

### **Potentially High Levels of Trading Risk**

Jenkins Wealth's trading methodology, Market Guard™, includes portfolio rebalancing and possible tax-loss harvesting that may possibly lead to high levels of trading. High levels of trading could result in a possible bid/ask spread expense; trade executions that may occur at prices beyond the current bid/ask spread if a quantity demanded exceeds quantity available at the bid/ask price. Jenkins Wealth's trading may adversely move prices, such that subsequent transactions may occur at a worse price. Any unfulfilled orders or portfolio drift, in the event that markets are disorderly or trading halts altogether, as well as unforeseen trading errors, are also risks a Client should be considering when investing.

### **ETF Risks, including Net Asset Valuations and Tracking Error**

ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange

traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they may pay two levels of compensation – advisory fees charged by Jenkins Wealth plus any management fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly.

An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the fund may include ETF management fees, custodian fees, brokerage commissions, and legal and account fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. Clients have access to current ETF information, including expenses through their Schwab portal.

### **Advisory Risk**

There is no guarantee that Jenkins Wealth's judgement or investment decisions about particular securities or asset classes will necessarily produce the indented results.

### **Item 9: Disciplinary Information**

There are no legal or disciplinary events that are material to a Client's or perspective Client's evaluation of this advisory business or the integrity of our management.

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

Neither Jenkins Wealth nor it's Investment Advisor Representatives are registered or affiliated with any Broker/Dealer, Futures Commission, Commodity Pool Operator nor Commodity Trading.

### **Possible Conflict of Interest**

Jenkins Wealth's Registered Investment Advisor Representatives may also be licensed insurance agents. From time to time, they will offer Clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Jenkins Wealth always acts in the best interest of the Client; including the sale of commissionable products to advisory Clients. Clients are in no way required to implement the plan through any representative of Jenkins Wealth in their capacity as an insurance agent.

## **Selection of Other Advisors or Third-Party Money Managers**

Jenkins Wealth may direct Clients to third party money managers, and if so, will be compensated via a fee share from the advisers to which it directs those Clients. This relationship will be disclosed in each contract between Jenkins Wealth and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. Jenkins Wealth will always act in the best interests of the Client, including when determining which third party manager to recommend to Clients. Jenkins Wealth will make every effort to ensure that all recommended advisors or managers are licensed or notice filed in the states in which Jenkins Wealth is recommending them to Clients.

## **Item 11: Code of Ethics, Participation in Transactions, Personal Trading**

Our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our Clients at all times.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any Client. At the same time, we believe that if investment goals are similar for Clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities.

Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We required all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics.

This disclosure is provided to give all Clients a summary of our Code of Ethics. However, if a Client or potential Client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

## **Investing Personal Money in the Same Securities as Clients**

Jenkins Wealth may buy or sell securities for themselves that they also recommend to Clients. Jenkins Wealth will always document any transactions that could be construed as conflicts of interest. A periodic review of Personal Securities Transactions will be conducted to ensure that no conflict has occurred.

## Item 12: Brokerage Practices

### A. Factors Used to Select Custodians

Jenkins Wealth has chosen to use Charles Schwab (Schwab) as our primary custodian for accounts.

As part of the arrangement described in Item 12-A, Schwab also makes certain research and brokerage services available to our firm at no additional cost. We may utilize their institutional platform, and have access to certain reporting, research and trading platforms that are not available to the general public. The aforementioned research and tools may be used by our firm to manage accounts for which we have investment discretion. In addition, we may also receive from Schwab without cost, and/or at a discount, compliance and or practice management-related publications, discounted and/or gratis consulting services, discounted and/or gratis attendance at conferences, meetings and other educational event and marketing support. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

Schwab will charge brokerage commissions or transaction fees for effecting certain securities transactions. Our Clients may pay a transaction charge to Schwab that is higher than another qualified broker/dealer to affect the same transaction. Jenkins Wealth strives to determine in good faith that the fee is reasonable in relation to the value of the brokerage and research services received. In seeking the best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer services, including the value of research provided, execution capability, commission rates and responsiveness, accordingly, although we will seek competitive rates, to the benefit of all Clients, we may not necessarily obtain the lowest possible fee rates for specific Client transactions.

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

Jenkins Wealth maintains the ability to block trade transactions for Clients participating in the Market Guard™ trading strategy across accounts. Jenkins Wealth may, but is not obligated to, combine multiple orders for shares of the same securities purchased for advisory accounts Jenkins Wealth manages (this practice is commonly referred to as “block trading”). Jenkins Wealth will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased or sold is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Accounts owned by Jenkins Wealth or persons associated with Jenkins Wealth may participate in block trading with Client accounts; however, they will not be given preferential treatment.

### **Item 13: Reviews of Accounts**

The underlying securities within the Jenkins Wealth portfolios, as well as securities in the Market Guard™ trading strategy are continuously and actively monitored by Bradley Jenkins, Chief Investment Officer. Accounts are reviewed in the context of each Client's stated investment objectives and guidelines on an as-needed basis.

Certain triggers, such as major market or economic events, a Client's life event or request from the Client may also be cause for a review.

Jenkins Wealth provides all Clients with continuous access via two separate Client login portals. All Clients have access directly to Charles Schwab where they are able to obtain information such as Client statements, activity and current positions. In addition, Jenkins Wealth maintains a Client portal where Clients can access quarterly performance reports, current holdings, current equity vs. fixed income weights on both a household and account level detail as well as monthly video commentary produced by the Chief Investment Officer detailing current conditions as well as any changes being made to the underlying Market Guard™ portfolios. This information regarding the current conditions as well as any changes being made to the underlying Market Guard™ portfolios is also sent in written form to all Clients on a monthly basis. Clients may also choose to receive periodic e-mail and/or text message communications describing portfolio performance and balances.

### **Item 14: Client Referrals and other Compensation**

Jenkins Wealth does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Jenkins Wealth Clients. Also, Jenkins Wealth does not directly or indirectly compensate any person who is not advisory personnel for Client referrals, nor do we maintain any solicitor arrangements.

### **Item 15: Custody**

Jenkins Wealth is considered to have Custody of Client's accounts only to the extent of our ability to directly debit the account for payment of management fees stated in Item 5. To approve this deduction, the Client must sign and approve the appropriate section in the Investment Advisory Contract as well as approve the account opening document with the custodian for fee billing authorization.

The Client will receive at least quarterly statements from the custodian. As the custodian does not verify the accuracy of the fee being billed, it is important for the Client to carefully review the information provided on the statements.

**Item 16: Investment Discretion**

Jenkins Wealth will obtain written Client authorization to investigate, purchase and sell on behalf of the Client various securities and investments. Jenkins Wealth is authorized to execute purchases and sales of securities on Clients' behalf without consulting the Client regarding each purchase or sale. Clients cannot limit our discretionary authority, they can only revoke discretion upon written notification to Jenkins Wealth. Jenkins Wealth also reserves the ability to terminate the discretionary relationship upon written notification to the Client.

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

Jenkins Wealth will not ask for, nor accept voting authority for Client securities. Clients will receive proxies directly from the issuer of the security or the custodian.

**Item 18: Financial Information**

This item is not applicable because Jenkins Wealth does not require or solicit the prepayment of any advisory fees. Also, Jenkins Wealth does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.