

TOWER WEALTH ADVISORS, INC.
A Registered Investment Adviser

IARD # 154053

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Wheaton, Illinois, USA 60187

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January 3, 2023

Registration does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Tower Wealth Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at chip.krueger@towerwealthadvisors.com (see contact information above). 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 Tower Wealth Advisors, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

2. MATERIAL CHANGES

This item discloses material changes since the last update of this brochure. Our last update was on January 14, 2022.

There are no material changes.

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4. ADVISORY BUSINESS

A. Our Company and Principals

Tower Wealth Advisors, Inc., an Illinois corporation, ("TWA") has been in business since March 23, 2010. We are an Illinois registered investment advisor. TWA's principal owners are, Paul Keith Craig, and Kraig "Chip" Paul Krueger.

B. Types of Advisory Services We Offer

(1) Investment Supervisory Services

Prior to engaging TWA to provide investment advisory services, the client will be required to enter into one or more written agreements with TWA setting forth the terms and conditions under which TWA shall render its services (collectively the "Agreement"). In addition, TWA may only implement its investment management recommendations after the client has arranged for and furnished TWA with all information and authorization regarding accounts with appropriate financial institutions.

TWA will generally recommend that clients put their money with a third-party adviser who establishes portfolios with certain risk parameters and with investments in various mutual fund categories. TWA will not create its own portfolios. Portfolio management will be offered to all clients. TWA will generally invest its client's assets in exchange-traded funds, no-load mutual funds, equities, and debt instruments. TWA will have discretion over most of its clients' accounts; however, TWA has one or more accounts that are non-discretionary. Discretionary accounts are traded according to written guidance from each client's advisory account agreement. Recommendations for each client will be made on an individual basis for each client depending upon their needs, expectations and risk tolerance.

In order to facilitate an understanding of each client's needs, expectations and risk tolerance, TWA will utilize a risk questionnaire and client profile. These preliminary forms will be used to assess a client's risk tolerance, cash needs (both current and future) and long-term plans. Accordingly, TWA will work with the client to recommend the most suitable portfolio investments with the third-party adviser.

(2) Financial Planning and Consulting Services

TWA also offers advice concerning the following: traditional financial planning, retirement planning, investment planning, asset allocation, fund choice, estate planning, insurance planning, college planning, tax planning, business succession, budget analysis, and risk management.

TWA engages in broad-based and structured financial planning. Such services typically involve providing a variety of services to clients regarding the management of their financial resources based upon an analysis of their individual needs. The process typically begins with an initial one-half hour complimentary consultation during which the various services provided by TWA are explained.

During or after the initial consultation, if the client decides to engage TWA, pertinent information about the client's personal and financial circumstances and objectives is collected. As required, TWA will conduct follow-up interviews for the purpose of reviewing and/or collecting financial data. Once such information has been reviewed and analyzed, a written financial plan — designed to achieve the clients' stated financial goals and objectives — will be produced and presented to the client at no charge.

Some clients may only require advice on a single aspect of the management of their financial resources. For these clients, TWA offers financial planning in a modular format and/or general consulting services that address only those specific areas of concern.

In general, these services include any one or all of the following:

- a. **Spreadsheet Analysis, Reports & Consultations** -This Includes the formation of financial statements which may include a financial summary and cash flow statement as well as an analysis of these items to evaluate the client's current situation and to help build a financial roadmap for the future. The Firm also may consolidate account information such as account titling, account numbers, cost basis, inception dates, market values and interest/dividend earnings where such information is available.
- b. **Retirement Planning** - This involves advice with respect to alternatives and techniques for accumulating wealth for retirement income or advice relative to appropriate distribution of assets following retirement. Additionally, self-directed retirement assets are evaluated and, where appropriate, recommendations and assistance are provided. Tax consequences and their implications are identified and evaluated in general terms. TWA is not engaged in rendering legal or accounting advice, has no lawyers or accountants on staff and therefore refers all matters requiring legal or tax advice to the client's chosen and properly licensed professionals in these areas.
- c. **Investment Planning/Asset Allocation/Fund Choice** - This involves advice with respect to asset allocation and investment income accumulation techniques. Evaluations are made of existing and, when applicable, potential investments in terms of their economic and tax characteristics as well as their suitability for meeting client's objectives. Tax consequences and their implications are identified and evaluated in general terms.
- d. **Estate Planning** - This service generally involves a review of assets and liabilities, the titling of assets, and the consideration of trusts. However, the Firm may provide advice with respect to property ownership, distribution strategies, estate tax reduction, and tax payment techniques, as well as a discussion of gifts, trusts, and the disposition of business interests, among other things. Tax consequences and their implications are identified and evaluated in general terms. The client's chosen licensed attorney must be used for evaluation and document creation.

- e. **Insurance Planning** - This includes risk management associated with advisory recommendations based on the combination of insurance types that best meet a client's specific needs, e.g. life, health, disability, home, auto, and long-term care, and others as appropriate.
- f. **College Planning** - This includes alternatives and strategies with respect to the complete or partial funding of college or other post-secondary education experience. Tax consequences and their implications are identified and evaluated in general terms.
- g. **Tax Planning** - Tax planning is referred to the client's chosen personal tax advisor. TWA may offer advice as to how tax laws may affect various financial decisions, e.g. acquisitions, pension strategy, investing in new opportunities or consolidation of existing investments, and individual taxation issues, among others.
- h. **Consolidation of Financial Situation** - As a result of performing some or all of the services listed in bullets 1 through 7 above, TWA may be able to recommend strategies or methods for consolidating the client's financial situation in order for the client to manage their financial situation more easily and to obtain efficiency, cost savings, and diversification.
- i. **ETFs and Annuities** - TWA may also provide advice about exchange-traded funds (ETFs) and variable indexed annuities.
- j. **Divorce Financial Planning** – this includes analysis of various divorce settlement scenarios for cash flow purposes and long term financial planning.

C. Tailor Investment Advice to Individual Clients

TWA tailors our advisory services to the individual needs of each client. Depending on the type of services requested, TWA establishes the client's risk profile, time horizon for investing, investment needs and types of investments desired. Once those factors are established, TWA will determine what investment advice may be most appropriate for this particular client. TWA's clients are advised to promptly notify TWA if there are ever any changes in their financial situation or investment objectives or if they wish to impose any reasonable restrictions on their account.

D. Wrap Fee Programs

TWA does not have any wrap fee programs.

E. Client Assets Managed by TWA

As of December 31, 2022, TWA manages approximately \$30,728,208.10 in client assets: approximately \$30,007,690.96 on a discretionary basis and approximately \$720,517.14 on a non-discretionary basis.

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5. FEES AND COMPENSATION

A. Compensation

TWA charges clients without assets under management with TWA for investment advice at a billable rate of \$300 per hour.

TWA does not separately charge clients with assets under management for financial planning and consulting services other than the Divorce Financial Planning.

TWA charges a two-tiered fee structure for Divorce Financial Planning. For marital assets under \$1 million, the flat fee is \$1,500.00. For marital assets over \$1 million, the flat fee is \$2,500.00

TWA charges clients for investment supervisory services a percentage-based fee, dependent upon the value of the client's assets under management with TWA. The billable balance is based upon the custodian's market value placed on the assets under management. In absence of a custodial value, TWA and client agree to seek the opinion of an unaffiliated third party.

The annual fee shall vary depending upon the market value of the assets under management, and any breakpoints. Generally, TWA's maximum fee schedule is as follows:

<u>Assets Under Management</u>			<u>Maximum Advisory Fees</u>
\$0	-	\$250,000	2.5%
\$250,001	-	\$500,000	2.3%
\$500,001	-	\$1,000,000	2.1%
\$1,000,001	-	\$2,000,000	1.9%
\$2,000,001	-	Above	1.8%

The computation of investment management fees is based upon a percentage of assets under management according to the sliding scale shown above. TWA, in its sole discretion, may negotiate to waive its stated account minimum or charge a lesser management fee based upon certain criteria (i.e., anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, account retention, pro bono activities, etc.).

TWA charges a flat \$85 annual administrative account service fee per each account in addition to the management fee.

B. Deduction of Our Fees

The Customer Agreement and/or a separate agreement with the Custodian(s) authorizes TWA, through the Custodian(s), to debit the client's account monthly for the amount of TWA's fee and have the Custodian directly remit that management fee to TWA in accordance with applicable custody rules. The Custodian(s) recommended by TWA have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management of fees paid directly to TWA.

C. Other Fees and Expenses

Clients pay the transaction costs associated with management of the account. These may include brokerage commissions, transaction fees, custodial fees, charges imposed directly by a mutual fund or exchange traded fund in the account, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer fees and other related expenses. (See also Section 12 Brokerage Practices.) TWA shall not receive any portion of these commissions, fees, and costs, and they are in addition to TWA's fees.

In addition, TWA may place client assets with third-party money managers who will also charge a fee for their management services. All fees will be disclosed by TWA to clients in the event it deems it in the best interest of the client to invest with a third-party money manager.

D. Payment of Fees in Advance

For percentage-based fees, the annual fee will be prorated and charged monthly, in advance, based upon the market value of the assets on the last day of the prior month. For the initial month of investment management services, the first month's fees shall be calculated on a pro rata basis. A client may obtain a pro-rated refund of any unearned pre-paid fee if the advisory contract is terminated before the end of the billing period.

E. Other Compensation We May Receive

We do not receive compensation for the sale of securities or other investment products.

6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not accept performance-based fees.

7. TYPES OF CLIENTS

We provide investment advice to individuals, pensions and profit sharing plans, and trusts, estates or charitable organizations.

TWA has a minimum account size of \$250,000. However, in its sole discretion, TWA may waive or lower the minimum account size.

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

A. Method of Analysis and Investment Strategies

Investing in securities involves risk of loss that clients should be prepared to bear. Further, there are no guarantees that any method of analysis or investment strategy will be successful or that clients will reach their goals.

TWA uses fundamental analysis in formulating investment advice in managing client assets. Fundamental analysis is a method of evaluating a security that entails attempting to measure its intrinsic value by examining related economic, financial, and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including macroeconomic factors (like the overall economy and industry conditions) and company-specific factors (like financial condition and management).

TWA also uses technical analysis in formulating investment advice for clients. Technical analysis is a method of evaluating trading information, such as previous prices and trading volume, charting along with mathematical indicators and computer models and algorithms to make trading decisions.

The investment strategies used to implement any investment advice given to clients include both long term purchases (securities held at least a year) and short term purchases (securities sold within a year).

The main sources of information applicant uses include: professional subscriptions, financial newspapers and magazines, research materials prepared by others, annual reports, prospectuses, filings with the Securities and Exchange Commission; and company press releases.

B. Material Risks Involved

The material risks involved in fundamental analysis are that there are many macroeconomic indicators of and other factors related to a security's value, and TWA may not take them all into consideration or may place inappropriate weights on such factors.

The material risks involved in technical analysis are that a model or algorithm may not include all relevant factors or may include irrelevant factors and that modeling past performance or trends does not necessarily indicate or predict future performance or trends.

C. Types of Investments

TWA offers advice on the following range of types of investments: exchange-listed securities; exchange-traded mutual funds; securities traded over-the-counter; foreign issuers; warrants; corporate debt securities (other than commercial paper); commercial paper; certificates of deposit; municipal securities; investment company securities including variable life insurance, variable annuities, and mutual fund shares; United States government securities, and others.

9. DISCIPLINARY INFORMATION

TWA and its Principals have not been subject to any disciplinary action.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND

AFFILIATIONS A. Pending and Current Registration with

Brokers/Dealers

Paul Keith Craig is currently a Registered Representative at Ausdal Financial Partners, Inc., an Iowa corporation, where he has worked since June 2015.

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

TWA and our Principals are not registered and do not have any applications pending to register as a futures commission merchant, commodity pool operator, or commodity trading advisor.

C. Material Relationships Maintained by TWA and Conflicts of Interest

TWA has arrangements that are material to its advisory business or its clients with the following related persons, which may create conflicts of interest: FormulaFolios Distributors, Inc., another investment advisor and an Illinois corporation and Tower Financial Management Company, an insurance company or agency and an Illinois corporation.

D. Recommendation and Selection of Other Investment Advisers and Conflicts of Interest

Neither TWA nor any related person has any arrangements, oral or in writing, where it is paid cash by or receives some economic benefit from a non-client in connection with giving advice to clients, nor directly or indirectly compensates any person for client referrals. (See ADV Brochure Part 2B regarding FormulaFolios Distributors.)

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

TWA has adopted a code of ethics pursuant to federal law that sets forth the standards of conduct expected of its associated persons and requires compliance with applicable securities laws ("Code of Ethics"). TWA and its associated persons may come into possession from time to time of material nonpublic or other confidential information about companies that, if disclosed, might affect an investor's decision to buy, sell or hold a security. Under federal law, TWA and our associated persons would be prohibited from improperly disclosing or using this information for their personal benefit or for the benefit of any other person, including clients. In accordance with Section 204A of the Advisers Act, TWA's Code of Ethics contains written policies reasonably designed to prevent the unlawful use of material non-public information by TWA or any of its associated persons. The Code of Ethics also requires that certain of TWA's personnel (called "Access Persons") report their personal securities holdings and transactions and obtain pre-approval of certain investments such as initial public offerings and limited offerings. Clients may contact TWA to request a copy of its Code of Ethics.

B. Participation or Interest in Client Transactions

TWA does not participate or take an interest in Client transactions.

C. Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

TWA and investment advisory representatives associated with TWA are permitted to buy or sell securities that they also recommend to clients consistent with TWA's policies and procedures.

Generally, TWA and its associated persons will trade simultaneously with clients in block trades. If a limited security, the clients' transactions will always go first. Neither TWA nor any associated person shall receive preferential treatment in trading or receive a better price than the clients if done simultaneously.

D. Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

TWA and related persons associated with TWA may recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that TWA or a related person buys or sells the same securities for TWA's or the related person's own account. Such recommendations may present a conflict of interests, in which case the clients' transactions will always be given priority.

12. BROKERAGE PRACTICES

A. Factors in Recommending or Selecting Brokers-Dealers for Client Transaction

The commissions paid by TWA's clients shall comply with TWA's duty to obtain "best execution." However, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where TWA determines, in good faith, that the commission is reasonable in relation to the value of the brokerage services received. In seeking 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's services, including among others, execution capability, commission rates, and responsiveness. Consistent with the foregoing, while TWA will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client transactions.

1. Research and Other Soft Dollar Benefits

TWA does not receive any soft dollar benefits from any broker-dealers.

2. Brokerage for Client Referrals

TWA and its related persons do not receive client referrals from a broker-dealer or third party.

3. Directed Brokerage

Paul Craig is a Registered Representative of Ausdal Financial Partners, Inc. an Iowa corporation ("Ausdal") and all his non-advisory client trades are required to be made through Ausdal. Trades made through Ausdal present potential conflicts of interest because Mr. Craig receives compensation as registered representatives from their respective broker-dealer firms to which they direct brokerage.

Other factors that TWA considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation include their respective financial strength, reputation, execution, pricing, and service. The brokerage commissions and/or transaction fees charged by Ausdal or any other broker-dealer are exclusive of and in addition to TWA's fee.

B. Aggregation of Trades

Generally, TWA aggregates the purchase and sale of securities for various clients in block trades.

13. REVIEW OF ACCOUNTS

A. Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

The day-to-day supervision of TWA's accounts is the responsibility of Chip Krueger, President, Chief Executive Officer and Chief Compliance Officer. TWA monitors client portfolios as part of an ongoing process while regular account reviews are conducted on at least an annual basis. In addition, each client portfolio is reviewed periodically for compliance with investment policies, suitability of investments, and client investment objectives. Chip Krueger is responsible for overseeing all reviews, which may be conducted by Paul Craig or his designee(s).

All investment advisory clients are encouraged to discuss their needs, goals and objectives with TWA and to keep TWA informed of any changes thereto. TWA shall contact ongoing investment advisory clients at least annually to review its previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

B. Review of Client Accounts on Non-Periodic Basis

Factors that may trigger more frequent reviews include material market events or changes in a client's personal situation. Other conditions that may trigger a review are changes in market, political or economic conditions, tax laws, new investment information, and changes in a client's own situation.

C. Content of Client Provided Reports and Frequency

TWA does not provide regular reports to clients regarding their accounts. Our Custodians send Clients quarterly reports.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

TWA does not receive an economic benefit from someone who is not a client for providing advisory services to our clients.

B. Advisory Firm Payments for Client Referrals

TWA does not directly or indirectly compensate any person who is not a supervised person for client referrals.

15. CUSTODY

TWA uses the following custodians. Folio Institutional of Folio Investments, Inc., from Mclean, Virginia, is used as a custodian for its discretionary client assets under management. TWA also uses Charles Schwab & Company, Inc., and Newport Group, Inc as custodians for some of its limited discretionary and non-discretionary client assets under management and TWA uses Mainstar Trust Company, Onaga, Kansas for its non-discretionary client assets under management. Which custodian(s) that is/are used is based on the specific situation for each client.

The Custodian(s) recommended by TWA have agreed to send a statement to the client, at least quarterly, indicating all amounts disbursed from the account including the amount of management of fees paid directly to TWA. Clients should carefully review their statements from the Custodian(s).

16. INVESTMENT DISCRETION

TWA accepts discretionary authority to manage securities accounts on behalf of clients, which authority is limited by written guidance from each Client's Advisory Account Agreement ("Agreement"), which must be completed, reviewed, and accepted before TWA assumes discretionary authority.

17. VOTING CLIENT SECURITIES

TWA does not vote client securities or proxies.

18. FINANCIAL INFORMATION

A. Prepayment of Fees

TWA does not require or solicit prepayment of fees from clients six months or more in advance.

B. Financial Conditions Reasonably Likely to Impair Advisory Firm's

Ability to Meet Commitments to Clients

No Financial condition exists that is reasonably likely to impair TWA's ability to meet its commitments to Clients.

C. No Bankruptcy

Neither TWA nor any of its Principals have been the subject of a bankruptcy petition in the last ten years.

19. Requirements for State Registered Advisors

A. Principal Executive Officers and Management Persons

The Principal Executive Officers and Management Persons of TWA are disclosed in the attached and incorporated ADV Brochure Part 2B, the Brochure Supplement.

B. Other Business Activities Engaged In

Other business activities engaged in by Management Persons are disclosed in the attached and incorporated ADV Brochure Part 2B, the Brochure Supplement.

C. Performance Based Fee Description

TWA does not charge performance based fees.

D. Disclosure of Material Facts Related to Arbitration or Disciplinary Action Involving Management Persons

None of TWA's Management Persons has any arbitration or disciplinary events.

E. Material Relationships maintained by TWA or Management Persons with Issuers of Securities

Neither TWA nor its Management Persons maintain any material relationships with issuers of securities.

ADV Brochure Part 2B

Brochure Supplement

TOWER WEALTH ADVISORS, INC.
A Registered Investment Adviser

IARD # 150453

301 South County Farm Road, Suite D

Wheaton, Illinois, USA 60187

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630-682-1888

January 3, 2023

This Part 2B Brochure Supplement augments the ADV Part 2A and should be reviewed by you as one document to provide you with information about Tower Wealth Advisors, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Kraig "Chip" Paul Krueger at Chip.Krueger@towerwealthadvisors.com or 630-682-1888 (see contact information above).

This brochure supplement provides information about the following Financial Advisers:

Paul Keith Craig
Kraig "Chip" Paul Krueger
Graham Barry Craig

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. Registration does not imply a certain level of skill or training.

Additional information about Tower Wealth Advisors, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

1. Requirements for State-Registered Advisers

a. Principal Executive Officers and Management Persons.

The Principal Executive Officers and Management Persons of TWA are: Paul Keith Craig and Kraig "Chip" Paul Krueger. Please see the additional information below on each of them.

PAUL KEITH CRAIG

1. Educational Background and Business Experience

Mr. Craig is an owner and investment advisor representative at Tower Wealth Advisors, Inc. since November 2010. He graduated in 1992 with a B.S. from Wheaton College. Born in 1968, Mr. Craig also has been a teacher at Glenbard North High School in Carol Stream, Illinois since 1998. He worked at Robert B. Ausdal & Co. as a registered representative from October 2007 to November 2010. He worked at Southeast Investments, Inc. as a registered representative from November 2012 to June 2015, and currently works at Ausdal Financial Partners, Inc. as a registered representative. Mr. Craig has his Series 6 and 65 licenses.

Series 65 is the Uniform Investment Adviser Law Examination is a three hour exam designed to qualify candidates as investment adviser representatives.

Registration as an investment advisor or investment advisor representative does not imply a certain level of skill or training.

2. Disciplinary Information

Mr. Craig has no legal or disciplinary events.

3. Other Business Activities

Mr. Craig has been an insurance agent at Tower Financial Management Company in Wheaton, IL, since January 2000. Mr. Craig is also a Registered Representative of Ausdal Financial Partners Inc. since June 2015.

4. Additional Compensation

Paul Craig is a Registered Representative of Ausdal Financial Partners Inc. ("Ausdal") and all his non-advisory client trades are required to be made through Ausdal. Trades made through Ausdal present potential conflicts of interest because Mr. Craig receives compensation as a Registered Representative from Ausdal to which he directs brokerage. By directing brokerage to Ausdal, TWA may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money. Additionally, Mr. Craig is an insurance agent of Tower Financial Management and receives compensation from the insurance companies where he places life

insurance and annuity business for TWA clients. TWA does not charge a fee on insurance products where Mr. Craig earns compensation.

5. Supervision

Mr. Krueger as the Chief Compliance Officer of TWA regularly supervises the investment advisory services provided to Clients through TWA. His telephone number is (630) 682-1888.

6. Requirements for State-Registered Advisors

A. Events Involving an Arbitration, a Self-Regulatory Organization, or an Administrative Proceeding

Mr. Craig has not been involved in any event involving an arbitration, a self-regulatory organization, or an administrative proceeding.

B. Bankruptcy

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

KRAIG "CHIP" PAUL KRUEGER

1. Educational Background and Business Experience

Mr. Krueger is President, CEO and CCO of Tower Wealth Advisors, Inc., where he has worked since May 2011. Mr. Krueger graduated from Wheaton College in 1987 with a B.A. in business and economics. He was born in 1965 and was a Registered Principal at Securities America, Inc. from 1996 to 2007 and a Registered Representative at Ausdal Financial Partners from 2007 to 2020. During his time with Securities America and Ausdal, Mr. Krueger carried his series 7, series 24 and series 66 licenses.

Series 7 is the General Securities Representative examination tested of six hours and qualifies a candidate for the solicitation, purchase, and/or sale of all securities products. Series 24 is the General Securities Principal examination tested over 3 hours and 45 minutes and qualifies individuals required to register as general securities principals in order to manage or supervise the member's investment banking or securities business. The Series 66 Uniform Combined State Law examination takes 2 hours and 30 minutes and is designed to qualify candidates as both securities agents and investment adviser representatives. The Series 7 is a co-requisite exam that needs to be successfully completed in addition to the Series 66 exam before a candidate can register with a state.

Registration as an investment advisor or investment advisor representative does not imply a certain level of skill or training.

2. Disciplinary Information

Mr. Krueger has no legal or disciplinary events.

3. Other Business Activities

Mr. Krueger has been President of Tower Financial Management Company (“TFMC”), an Illinois registered insurance agency, since January 1994. TFMC is in the business of selling life insurance and annuities.

4. Additional Compensation

Mr. Krueger is an insurance agent of Tower Financial Management (“TFMC”) and receives compensation from the insurance companies where he places life insurance and annuity business for TWA clients. TWA does not charge a fee on insurance products where Mr. Krueger earns compensation.

5. Supervision

Mr. Krueger as the Chief Compliance Officer of TWA regularly supervises the investment advisory services provided to Clients through TWA. His telephone number is (630) 682-1888. His performance is reviewed periodically by TWA’s other Management Persons. Concerns related to Mr. Krueger should be directed to Paul Keith Craig (630)532-8734.

6. Requirements for State-Registered Advisors

A. Events Involving an Arbitration, a Self-Regulatory Organization, or an Administrative Proceeding

Mr. Krueger has not been involved in any event involving an arbitration, a self-regulatory organization, or an administrative proceeding.

B. Bankruptcy

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

GRAHAM BARRYCRAIG

1. Educational Background and Business Experience

Mr. Craig is an investment advisor representative at Tower Wealth Advisors, Inc. since March 2016. He graduated in 1989 with a B.S. from Indiana University. Born in 1966, he worked at Robert W. Baird as registered representative and an investment advisor representative from October 2011 to February 2016. He worked at Morgan Stanley as a registered representative and an investment advisor representative from January 2010 to October 2011. While with these broker/dealers, Mr. Craig carried the Series 7 and 66 licenses.

The Series 7 is the General Securities Representative examination tested of six hours and qualifies a candidate for the solicitation, purchase, and/or sale of all securities products. The Series 66 is the Uniform Investment Adviser Law Examination and is a three hour exam designed to qualify candidates as investment adviser representatives.

Registration as an investment advisor or investment advisor representative does not imply a certain level of skill or training.

2. Disciplinary Information

Mr. Craig has no legal or disciplinary events.

3. Other Business Activities

Mr. Craig has no other business activities

4. Additional Compensation

Mr. Craig has no other additional compensation

5. Supervision

Mr. Krueger as the Chief Compliance Officer of TWA regularly supervises the investment advisory services provided to Clients through TWA. His telephone number is (630) 682-1888.

6. Requirements for State-Registered Advisors

A. Events Involving an Arbitration, a Self-Regulatory Organization, or an Administrative Proceeding

Mr. Craig has not been involved in any event involving an arbitration, a self-regulatory organization, or an administrative proceeding.

B. Bankruptcy

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