

Form ADV Part 2A
Firm Brochure
March 30, 2024

MDX Wealth Management
Registered Investment Advisor
Investment Advisor Registration Depository #161309

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This brochure provides information about the qualifications and business practices of MDX Wealth Management. If you have any questions about the contents of this brochure, please contact Nicole Pachar at (832) 888-9500 or email nicole@mdxwealth.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. Registration with the SEC or State Regulatory Authority does not imply a certain level of skill or expertise.

Additional information about MDX Wealth Management is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This section of the brochure addresses only those “material changes” that have been made since our last posting or delivery of this document on the SEC’s public disclosure website (IAPD) www.advisorinfo.sec.gov.

Item 5: Fees and Compensation- ~~deleted Tiered Fee Structure and ability to fee on a monthly basis~~

We may at any time update this Brochure and either send, or offer to send a copy either by email or in hard copy form.

This Brochure may be downloaded from the SEC’s Investment Adviser Public Disclosure website as indicated above or free of charge by contacting our Chief Compliance Officer, Nicole Pachar at nicole@mdxwealth.com or by calling (832) 888-9500.

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A. Description of Your Advisory Business

MDX Wealth Management is a DBA. The firm’s legal name is Tamarind Advisors LLC a Texas limited liability company owned by James David Jones. MDX Wealth Management (MDX Wealth), based in Sugarland Texas is an independent wealth management firm that has been offering investment advisory services since 2012.

Additional Business Names and Brands:

MDX Wealth Management operates under the business name Ray Financial Services in some states including, but not limited to, Nevada, California, Arizona and Texas.

We offer investment advisory services through a network of independently contracted Investment Adviser Representatives who conduct business under the MDX Wealth Management name or another of our branded business names. In addition to MDX Wealth Management, certain IARs currently conduct advisory business through MDX Wealth Management under the following brands:

- Ray Financial Services, LLC: 3753 Howard Hughes Parkway Suite 200 Las Vegas NV 89169
www.rayfinancialservicesllc.com
- Crest Retirement Planning: 1600 Airport Freeway Suite 302 Bedford TX 76021
www.crestretirementplanning.com

Our independently contracted Investment Adviser Representatives who use branded business names are registered with MDX Wealth Management and offer advisory services through us. MDX Wealth Management does not hold ownership in the branded businesses nor does any branded business hold ownership in MDX Wealth Management.

B. Description of Advisory Services Offered

MDX Wealth is an independent Investment Advisory firm offering wealth management to high-net-worth individuals and families, trusts, endowments, corporations, pension and retirement accounts, foundations, and individuals. On a limited bases MDX Wealth may provide assistance in Estate planning, tax mitigation and financial & retirement planning. We are not tax professionals. MDX Wealth provides Investment Advisor services on a Discretionary and Non-Discretionary basis. MDX Wealth does not invest in private placements. We do invest in mainstream securities such as Equities, Bonds, ETFs, Mutual Funds, CD’s, and Money Market funds. We are only limited in our offerings by our custodians, Schwab and Interactive Brokers and the securities they will custody. Clients may impose restrictions on investing in certain securities in writing.

Portfolio Management Services

MDX Wealth provides continual advice concerning investments based on each individual’s needs, goals, objectives, liquidity requirements and other factors. Through discussion with the client the Investment Advisor Representative develops a personal portfolio guided by the stated objective(s). Some of the basis for selecting a particular investment may include but are not limited to:

- Performance history Stated objectives
- Management style Fee structure
- Industry sector Market Capitalization
- Volatility Portfolio size
- Liquidity Income potential

When appropriate to the needs of the client we may recommend Options investing. Options are often used to generate additional income or to hedge positions against downside losses. Options involve additional risk and

will only be recommended when in line with a client's tolerance for risk and their investment objectives. Options are not suitable for all clients.

Where requested and approved by the client MDX Wealth may use a Margin account in managing client assets. The client must sign the custodian's form(s) to approve margin trading specifically and carefully read the disclosures specific to trading on margin. Margin trading involves a higher degree of risk and will only be utilized in accordance with individual client's risk tolerance and their investment objectives. Margin trading is not appropriate for all clients and exposes the client to the potential for larger losses.

On a small scale, MDX Wealth offers annuity products which are specifically designed for Registered Investment Adviser firms. MDX Wealth earns no commissions for recommending these specific annuities. MDX Wealth may charge a fee, either on an hourly basis or on an ongoing percent of assets basis with clients signed approval.

Sub-advisory Services:

MDX Wealth Management does not currently act as a sub-advisor to other asset managers.

Individual Portfolio Management and Client Investment Restrictions

Each client portfolio is managed on an individualized basis. Through discussion and our questionnaire, we work with clients to determine an investment strategy that supports their financial goals, liquidity needs, financial status and risk profile. We rely on the answers our clients provide to make investment recommendation and decisions.

Some clients may wish to impose restrictions on investing in certain securities or types of securities and we will accommodate those restrictions where possible. Communication is an essential part of a relationship, and as a general rule, one of our advisors is always available to our clients by phone or for face-to-face meetings.

Retirement Accounts

Guidance from the US Department of Labor (DOL) under Title I of the Employee Retirement Income Security Act (ERISA) and/or the Internal Revenue Code (Code), requires MDX to inform you that when we and our Investment Advisor Representatives provide investment advice to you regarding your ERISA retirement plan or participant account or individual retirement account (which are all referred to as "retirement accounts"), that we and our Investment Advisor Representatives 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 for retirement accounts we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Regulations under ERISA and the Code define fiduciary investment advice as

- (1) advice or recommendations, for a fee or other compensation, regarding investing in, purchasing or selling securities or other property to a plan, plan participant, or IRA owner;
- (2) provided on a regular basis;
- (3) where the advice is provided pursuant to a mutual agreement or understanding that;
- (4) the advice serves as a primary basis for investment decisions with respect to the plan or IRA assets; and
- (5) the advice is individualized to the plan, participant or IRA owner.

Retirement Plan Rollovers

When leaving an employer, you typically have four options regarding your existing retirement plan:

- (1) leave the assets in the former employer's plan, if permitted,
- (2) roll over the assets to the new employer's plan, if one is available and rollovers are permitted,
- (3) roll over the assets to an Individual Retirement Account ("IRA"), or
- (4) take a full withdrawal in cash, which would result in ordinary income tax and a penalty tax if you are under age 59 1/2.

If your IAR recommends that you roll over your 401(k) or other qualified plan assets to an IRA, this rollover recommendation presents a conflict of interest in that we and your IAR would receive compensation (or may increase current compensation) when investment advice is provided following your decision to roll over your plan assets. Your IAR will discuss your retirement plan options including retention of your 401(k) or qualified plan assets with your current plan, if allowed. Prior to making a decision you should carefully review the information regarding your rollover options and are under no obligation to rollover retirement plan assets to an account managed by us.

C. MDX Wealth does not participate in wrap fee programs.

D. Discretionary and Non-Discretionary Assets Under Management

As March 2023 assets under management totaled \$48,220,694 with discretionary assets under management totaled \$27,502,721 and \$20,717,973 of non-discretionary assets under management. Discretionary management is defined as: the client has given us authority to place trades on their behalf in their accounts. Non-discretionary is defined as: the client chooses whether or not to place the trades we recommend. Assets charged an advisory fee but held away from MDX custodians will only be non-discretionary accounts.

Item 5 Fees and Compensation

A. Compensation & Schedule of Fees

The only source of revenue for our firm is the fees assessed to manage our clients' assets. The fee may be based on client's assets under our management or on an hourly basis. Hourly billing is offered on a very limited basis, and is generally for those clients with specific service needs, or for clients with assets held away from MDX Wealth's custodial firms. This fee compensates MDX Wealth for asset management services, investment advice and provided recommendations. The value of the assets will be based on information provided by the custodian of the assets. MDX is entitled to rely on the financial and other information that the custodian provides to MDX. MDX does not independently verify this information nor does MDX guarantee the accuracy of validity of such information.

It is the general policy of MDX Wealth to provide discretion to its Investment Advisor Representatives to negotiate their fee. Factors that may determine a client's fee structure may include, but are not limited to:

- Complexity of the securities,
- numbers of meetings requested per year,
- travel required,
- time spent to educate the investor,
- research and planning.

Therefore, all client fees are negotiable between the client and the Investment Advisor Representative and will vary. The Investment Advisor Representative or MDX Wealth can elect, at its discretion to waive a fee for an account. These are unique and special circumstances and are not the general rule.

Asset Based Fee Schedule-Portfolio Management, held away assets and Monitoring Service

The annual fee for portfolio management will be charged as a percentage (%) of assets under management based on the following:

Between 0% and 2.5% as negotiated between Advisor and client and noted on the MDX Wealth Management Advisory Agreement.

Hourly Rate Model: Client and Advisor agree to an hourly flat fee per hour, not to exceed \$500.00 per hour.

B. Methods of Payment-fees & Frequency

• Direct Debiting: Most clients choose to have their fees deducted directly from their accounts. The custodian does not validate our fee or its calculation. Fee amounts may be viewed on the account statement in the month immediately following the end of a Quarter, or the month the fee was billed to the account. No fee billing statement is sent to the client unless specifically requested or required by regulation.

• Pay-by-check: For clients who wish to pay via check, we will issue an invoice for our services. The client may pay us by personal, business check, or cashier's check. The Investment Advisor Representative has discretion over accepting a pay by check arrangement. The invoice is due upon receipt, and checks may be sent to:

MDX Wealth Management
2245 Texas DR Suite 300
Sugarland TX 77479

Fees are billed in advance each quarter. The account value the previous month/quarter provided by the custodian is the basis for calculating the fee. If the advisory agreement begins after the start of a month/quarter, the fee will be based on the initial value of the account. Referred to as a prorate fee. Prorated fees are calculated using the initial value times the number of days remaining in the month/quarter.

The custodian will not verify the calculation of the fee. It is the client's responsibility for verifying the accuracy of the fee calculation.

Calculation of Fees Examples:

Quarterly Fee Calculation: $\text{Management fee}/4 = \text{quarterly fee percentage}$. $\text{Quarterly fee percentage} \times \text{End of quarter value from custodian's statement} = \text{Quarterly Fee}$.

Example: 1.875% Annual fee, and \$1,000,000 Account Value.
 $.01875/4 = .0046875 \times \$1,000,000 = \$4,687.50$

In the event of a prorated fee:

Quarterly Billed Calculation: $\text{Management fee}/4 = \text{quarterly fee percentage}$. $\text{Quarterly fee percentage} \times \text{initial value of account} = \text{Full quarterly fee}$. $\text{Full Quarterly fee} / \text{number of days in quarter} = \text{daily rate}$. $\text{Daily rate} \times \text{number of days assets under management} = \text{Fee Billed to Client}$.

Clients may from time to time have cash assets invested in money-market funds which charge a management fee on the assets invested in the money-market funds. MDX Wealth may also charge a fee on cash invested in money-market funds when such cash is considered available for long-term investing.

No client is under any obligation to enter into an advisory agreement with MDX Wealth Management. Clients are reminded that they may receive similar advisory services from other investment advisors, and lower fees for comparable services may be available from other sources.

C. Other Types of Fees or Expense Client May Pay

Annuities and Fees

MDX Wealth at its discretion can charge ongoing fees based on asset value in a clients' annuity account or it can charge a flat hourly fee. The annuity company and underlying funds may charge their own fees and expenses, these are independent of our advisory fees. MDX Wealth does not share in the companies' fees or expense. These fees will apply only when:

A. Approved by the client on an Investment Advisory Agreement

B. When allowed by the custodian and approved by the client signing the appropriate custodial/company form(s).

Performance Based Fee Arrangements:

MDX Wealth Management does not currently offer a performance fee-based arrangement for clients.

Special Fee Arrangements:

MDX Wealth Management reserves the right, in its sole discretion, to negotiate and to charge different fees for certain accounts based on the client's particular needs or requirements as well as overall financial condition, goals, risk tolerance and other factors unique to the client or for new or additional services not described herein. In particular, fees for certain foreign (non-U.S.) clients may be higher due to increased administrative costs and requirements. The maximum fee that may be charged by MDX Wealth Management is 2.5%.

Some MDX Wealth Management clients may ask MDX Wealth to provide additional investment advisory advice and services on all of their investment accounts, including those accounts not managed by MDX Wealth. The services that MDX Wealth may provide include:

Providing advice and assistance to the client in the development of an investment policy statement including the determination of short and long-term investment goals, downside risk tolerance, target returns and asset allocation ranges.

Providing multi-manager advice or private fund analysis based solely on information that is readily accessible through public sources or provided to MDX Wealth by the client for this purpose. Ultimately, however, it is the client's decision whether to engage any investment manager, or invest in any private offering.

Fee schedule for holders of Variable Annuities

MDX Wealth Management does not currently offer fee managed arrangements for Variable Annuities.

Sub-advisory Services and Solicitors Fees:

MDX Wealth Management is not currently engaged in a sub-advisory capacity to another firm.

Selection of other Advisors, Solicitation, and Client Servicing Arrangements:

MDX Wealth Management is not currently engaged in the solicitation of other Advisors.

Special Services:

Some MDX Wealth clients may ask us to provide additional investment advisory advice and services on all of their investment accounts, including those accounts not managed by MDX Wealth. Activities may include:

- Providing advice and assistance in development of an investment policy statement;
- Determining short- and long-term investment goals;
- Supporting financial planning, retirement planning, estate planning, tax planning and cash flow analysis

MDX Wealth and its Investment Advisor Representatives are not financial planners, tax professionals, nor CPA's. Ultimately, however, it is the client's decision whether to engage any investment manager, or invest in any security.

Private Funds:

MDX Wealth Management does not currently offer advisory services to any private funds.

Important Notes regarding advisory fees:

MDX Wealth shall have the ability to have its advisory fee for each client debited by the custodian on a monthly or quarterly basis, as the case may be. Clients are provided, at least on a quarterly basis, with written or electronic transaction confirmation notices and regular written or electronic summary account statements directly from the custodian and/or program sponsor for the client accounts.

To the extent that MDX Wealth provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by MDX Wealth with the account statements received from the account custodian. The account custodian does not verify the accuracy of the MDX Wealth's advisory fee calculation.

As a consequence of our authority to debit or withdraw fees from a client account, MDX Wealth Management shall take the following actions to ensure compliance with certain State Securities regulatory codes:

- 1) The investment adviser shall collect written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- 2) Each time a fee is directly deducted from a client account, the investment adviser shall:
 - a. Send the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
 - b. Where required by regulation sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

Additional Fees and Expenses:

Advisory fees payable to us do not include expenses a client pays to the custodial firm when we purchase or sell securities for his/her account(s). The following list is some, but not all of the fees or expenses that are generally paid directly by clients to their broker/dealer or custodian:

- Brokerage commissions
- Custodial fees
- Transaction fees
- Exchange fees
- Trading Activity Fees
- Regulatory Transaction Fees
- SEC fees
- Transfer taxes
- Wire transfer and electronic fund processing fees

These fees are charged directly by and paid to the broker/dealer or custodian from the clients' accounts. MDX Wealth Management does not receive, directly or indirectly, any portion of these fees charged to our client. In addition, our employees who are not dually registered do not directly receive any compensation from the purchase or sale of securities or investments for our clients. See Item 10 for information regarding dually registered employees. As a result, we are a "fee only" investment advisor. An Account activation fee has been listed on a minority of the advisory agreements; however, no fee has been charged by the ADVISOR, nor will one be charged when setting up accounts with the ADVISOR at this time.

Item 6 Performance Based Fees and Side-By Side Management

MDX Wealth Management does not currently offer a performance fee-based arrangement for clients.

Item 7 Types of Clients

We provide our services to the following types of Clients:

- Individuals, including high-net-worth individuals
- Trusts, estates, charitable organizations and institutions
- Corporations or other business entities
- Pension and profit-sharing plans
- Others

The firm does not generally have any minimum value requirements for opening or maintaining an account such as a minimum account size. For persons with a minimal amount to invest, we remind them that based upon our fee-based arrangements for managing assets we may not be the most suitable choice for them. Lower fees for comparable services may be available from other sources. The firm allows each Investment Advisor Representative the ability to set their own minimum asset value on assets under their management.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

MDX Wealth Management provides customized management of equity and bond portfolios for our clients. We seek to provide equity returns above the Standard & Poor's 500 stock index, and allocate clients' capital between equities, Exchange Traded Funds, Mutual Funds, Master Limited Partnerships, and fixed-income securities in accordance with their risk tolerance and their investment objectives. We may additionally utilize both call and put options to generate additional income or to hedge positions against downside losses. Put and call options are utilized in accordance with individual clients' risk tolerance and their investment objectives, and may not be suitable for all clients. MDX Wealth may additionally utilize Margin when managing client accounts. Margin trading will be utilized in accordance with individual clients' risk tolerance and their investment objectives, and may not be suitable for all clients.

Central to every investment decision we make on behalf of our clients is our fundamental research process. At MDX Wealth, we have access to research information provided by third party sources such as Morningstar, Convergenx, Canaccord, and CFRA as well as other resources.

The Chief Investment Officer of MDX Wealth Management, if one is appointed, may provide additional research and analysis of individual stocks, bonds, ETF's, MLP's, and asset allocation or portfolio structures for individual clients as needed.

Each of our Investment Advisor Representatives may attend meetings, conferences and trade shows sponsored by corporations, brokerage firms or industry groups.

In addition to visiting with companies, we utilize fundamental, top-down, bottom-up analysis for determining investment decisions. Our research analysis includes but is not limited to: the study of company annual reports, prospectuses, filings with the Securities and Exchange Commission and press releases. We do not use investment timing services of any kind.

Investment Strategies: We employ a "core" strategy which we believe derives its advantage from its flexibility. Since we are not constrained by investment size, style, or geography, we can identify the best investment opportunities available in the market, regardless of how they may be classified by the broader investment community. We are generally long-term investors who believe our clients benefit primarily from the growth and capital generation of the securities in which we invest, rather than any trading strategies we could employ.

Risk of Loss:

All investments in securities include a risk of loss of principal (invested amount) and any profits that have not been realized (securities that have not been sold to “lock in” the profit). Stock markets and bond markets can fluctuate substantially over time, and performance of any investment is not guaranteed. As a result, there is a risk of loss in the value of the assets we manage for our clients. We cannot guarantee any level of performance or that clients will not experience a loss in their account assets. Each type of security has its own inherent risks, many of these risks may be unique, such as a high usage of leverage with Exchange-traded funds, or ETF’s. Before investing in any security be sure to research and understand the objectives, risk and potential loss involved with a security. There is no guarantee provided nor implied when investing in any security.

Margin Risk

Clients may elect to open a margin account for trading. Risks are increased when using leverage in a portfolio, and price and values are subject to greater swings in margin accounts. Clients can lose more funds than they deposited if the value of securities decline.

Options Risk

Investment Advisor Representatives may recommend or purchase options for accounts. Many of the terms and definitions are complex regarding options. Please read through any and all materials provided regarding options trading carefully. Options are not appropriate for all clients. An option is the right to either buy or to sell a specific amount or value of a particular underlying interest at a fixed exercise price by exercising the option before its specified expiration date. Due to the nature of some options as a wasting asset which becomes worthless when it expires, an option holder risks the loss of the entire amount paid for the option. An option writer may be assigned options contracts at any time prior to and on the maturing date. The more an option is out of the money and the shorter the remaining time to expiration, the greater the risk that an option holder will lose all or part of his investment in the option. The exercise provisions of an option may create certain risks for the option holder. The courts, the SEC, another regulatory agency, OCC or the options markets may impose exercise restrictions. For more information regarding the risks of options, please read the “Characteristics and Risks of Standardized Options” brochure, found at www.theocc.com/components/docs/riskstoc.pdf.

Clients should understand and be willing to accept these and other types of risks before choosing to invest in securities or receive investment advisory services.

Item 9 Disciplinary Information

No disciplinary disclosures for MDX Wealth Management
No disciplinary disclosures for James David Jones
No disciplinary disclosures for Nicole J Pachar

Item 10 Other Financial Industry Activities and Affiliations

We have negotiated relationships with third-party custodial firms. MDX Wealth is not affiliated with these custodial firms. The custodial firms are: Schwab and Interactive Brokers. These firms hold all client assets including cash and securities. These firms effect trading to buy or sell securities in client accounts, hold client cash and securities, provide daily account values, cost basis gain/loss information and provide account statements and tax forms.

In some instances, a client may have an arrangement with a custodian or financial institution that precludes the client assets being moved onto the platform of one of our custodial firms. These accounts are managed the

same as any other account under our management, but the relationship between MDX Wealth and the client would be on a non-Discretionary basis.

At MDX Wealth Management we strive to always deal with our clients in a fair and equitable manner. This document outlines our business practices, and discloses the business relationships of both MDX Wealth and its management. To the clearest extent possible, all relationships of MDX Wealth Management and its management that may impair the ability of our representatives to render unbiased or objective advice have been disclosed.

Registrations with FINRA Member Broker-Dealers

Mr. James David Jones CRD# 5894020 is a Registered Representative with Bournehill Investment Services, Inc. CRD# 104003 a Texas registered Broker-Dealer and a FINRA member firm.

Mr. Jones may recommend the purchase of certain products on a commission basis. The recommendation by MDX Wealth's representatives who are dually registered with both an Investment Advisor (MDX Wealth Management) and a Broker-Dealer (Bournehill Investment Services, Inc.) that a client purchase a commission product from the Broker they are registered with presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. This conflict of interest and its mitigation are explained in Item 10 of the ADV Part 2A. Mr. Jones will act in your best interest when recommending security products.

Ms. Maria Dembski CRD# 3023270 is registered with MDX Wealth and Starlight Funding Investments, LLC CRD# 103957/SEC#: 8-52424, a California registered Broker Dealer and FINRA member firm. Ms. Dembski is employed strictly under the capacity of a compliance consultant. As such, Ms. Dembski has no direct contact with clients and would not be in a position that would represent a conflict of interest to any clients.

Timothy C Hobbs, CRD #2531874 is a Registered Representative with Bournehill Investment Services, Inc. CRD# 104003 a Texas registered Broker-Dealer and a FINRA member firm.

Mr. Hobbs may recommend the purchase of certain products on a commission basis. The recommendation by MDX Wealth's representatives who are dually registered with both an Investment Advisor (MDX Wealth Management) and a Broker-Dealer (Bournehill Investment Services, Inc.) that a client purchase a commission product from the Broker they are registered with presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. This conflict of interest and its mitigation are explained in Item 10 of the ADV Part 2A. Mr. Hobbs will act in your best interest when recommending security products.

Orlando Molina, CRD #2702165 is a Registered Representative with Bournehill Investment Services, Inc. CRD# 104003 a Texas registered Broker-Dealer and a FINRA member firm.

Mr. Molina may recommend the purchase of certain products on a commission basis. The recommendation by MDX Wealth's representatives who are dually registered with both an Investment Advisor (MDX Wealth Management) and a Broker-Dealer (Bournehill Investment Services, Inc.) that a client purchase a commission product from the Broker they are registered with presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. This conflict of interest and its mitigation are explained in Item 10 of the ADV Part 2A. Mr. Molina will act in your best interest when recommending security products.

Registration as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Neither MDX Wealth, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

Licensed Insurance Agents.

Mr. James David Jones, License #1710626 is a Texas licensed insurance agent and may recommend that you purchase insurance from him.

The recommendation by Mr. Jones that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Jones. Clients are reminded that they may purchase securities or insurance products recommended by MDX Wealth through other, non-affiliated broker-dealers or insurance agents.

Mr. Hobbs, License #850861, is a Texas licensed insurance agent and may recommend the purchase of certain insurance-related products on a commission basis.

The recommendation by Mr. Hobbs that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Hobbs. Clients are reminded that they may purchase securities or insurance products recommended by MDX Wealth through other, non-affiliated broker-dealers or insurance agents.

Mr. Molina, License #1181489, is a Texas licensed insurance agent and may recommend that you purchase insurance from him.

The recommendation by Mr. Molina that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from Mr. Hobbs. Clients are reminded that they may purchase securities or insurance products recommended by MDX Wealth through other, non-affiliated broker-dealers or insurance agents.

Advisory Services -Unregulated Investments.

MDX Wealth Management does not currently offer advisory services to any private funds.

Selection of other Advisors, Solicitation, and Client Servicing Arrangements:

MDX Wealth Management is not currently engaged in the solicitation of other Advisors.

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

MDX Wealth maintains an investment policy relative to personal securities transactions. This investment policy is in addition to MDX Wealth's overall Code of Ethics, which serves to establish a standard of business conduct for all of MDX Wealth's representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

MDX Wealth Management has elected to adopt the CFA Institute Code of Ethics and Standards of Professional Conduct, a complete copy can be obtained at www.cfainstitute.org.

In accordance with Section 204A of the Investment Advisers Act of 1940, MDX Wealth also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by MDX Wealth or any person associated with the MDX Wealth (The MDX Wealth Insider Trading Policy).

MDX Wealth and/or representatives of MDX Wealth may buy or sell securities that are also recommended to clients. This practice may create a situation where MDX Wealth and/or representatives of MDX Wealth are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as “scalping” (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if MDX Wealth did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, “front-running” (i.e., personal trades executed prior to those of the MDX Wealth’s clients) and other potentially abusive practices.

MDX Wealth has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the MDX Wealth’s “Access Persons”. The MDX Wealth’s securities transaction policy requires that an Access Person of MDX Wealth must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person’s current securities holdings at least once each twelve (12) month period thereafter on a date MDX Wealth selects; provided, however that at any time that MDX Wealth has only one Access Person, he or she shall not be required to submit any securities report described above.

MDX Wealth and/or representatives of MDX Wealth may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where MDX Wealth and/or representatives of MDX Wealth are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11.C, MDX Wealth has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of MDX Wealth’s Access Persons.

Item 12 Brokerage Practices

Factors that MDX Wealth considers in recommending any broker-dealer/custodian to clients include: historical relationship with MDX Wealth Management, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by MDX Wealth’s clients shall comply with MDX Wealth’s duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer or custodial firm might charge to effect the same transaction where MDX Wealth determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research 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 custodial firm or broker-dealer’s services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although MDX Wealth will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, MDX Wealth’s investment management fee. MDX Wealth Management’s best execution responsibility is qualified if securities that it purchases for client accounts are mutual funds that trade at net asset value as determined at the daily market close. Prior to engaging MDX Wealth to provide investment management services, the client will be required to enter into a formal Investment Advisory Agreement with MDX Wealth setting forth the terms and conditions under which MDX Wealth shall manage the client’s assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Research and Additional Benefits

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, MDX Wealth may receive from certain broker-dealer/custodians without cost (and/or at a discount) support services and/or products, certain of which assist MDX Wealth to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by MDX Wealth may be compensation for the costs of investment related research, investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support, computer hardware and/or software and/or other products used by MDX Wealth in furtherance of its investment advisory business operations.

As indicated above, certain of the support services and/or products that may be received may assist MDX Wealth in managing and administering client accounts. Others do not directly provide such assistance, but rather assist MDX Wealth to manage and further develop its business enterprise.

MDX Wealth's clients do not pay more for investment transactions effected and/or assets maintained as a result of this arrangement. There is no corresponding commitment made by MDX Wealth to any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

MDX Wealth shall comply with Section 28(e) of the Exchange Act with respect to Research and other benefits.

Brokerage for Client Referrals

MDX Wealth may select or recommend a broker-dealer based upon an existing relationship wherein MDX Wealth or its related persons receive client referrals from a broker-dealer or third party in exchange for directing business to said broker-dealer. This practice presents a conflict of interest in that the MDX Wealth or its related persons may have an incentive to select or recommend a broker-dealer based on their interest in receiving client referrals, rather than on their clients' interest in receiving most favorable execution.

To mitigate these risks, MDX Wealth Management has taken the following steps: (i) to assess our policies and procedures to ensure that we are seeking best execution of our clients' securities transactions and (ii) to have clear disclosures to safeguard against any material misstatements or omissions regarding our broker-dealer arrangements.

Directed Brokerage

The recommendation by MDX Wealth's representatives who are dually registered with both an Investment Advisor (MDX Wealth Management) and a Broker-Dealer (Synergy Securities) that a client purchase a commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any commission products from MDX Wealth's representatives. Clients are reminded that they may purchase securities or insurance products recommended by MDX Wealth through other, non-affiliated broker-dealers or insurance agents.

As a general rule, investment advisers should adopt and implement a compliance program and controls geared to the risks and investment strategy of the firm. These risks are particularly heightened when the investment adviser is dually registered or uses the services of an affiliated broker-dealer, as is the case of MDX Wealth Management.

To mitigate these risks, MDX Wealth Management has taken the following steps: (i) to assess our policies and procedures to ensure that we are seeking best execution of our clients' securities transactions and (ii) to have clear disclosures to safeguard against any material misstatements or omissions regarding our broker-dealer arrangements.

It is our policy to always have a reasonable and articulable basis to justify using in-house brokerage services.

MDX Wealth may receive referrals from broker-dealers and recognizes that this may create a conflict of interest.

MDX Wealth may at times accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific custodian or broker-dealer). In such client directed arrangements, however, the client will negotiate terms and arrangements for their account with that custodian or broker-dealer, and MDX Wealth will not seek better execution services or prices from other broker-dealers or be able to “batch” the client's transactions for execution through other broker-dealers with orders for other accounts managed by MDX Wealth. As a result, client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case.

In the event that the client directs MDX Wealth to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through MDX Wealth.

To the extent that MDX Wealth provides investment management services to its clients, the transactions for each client account generally will be effected independently, unless MDX Wealth decides to purchase or sell the same securities for several clients at approximately the same time. MDX Wealth may (but is not obligated to) combine or “bunch” such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among the MDX Wealth’s clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. MDX Wealth shall not receive any additional compensation or remuneration as a result of such aggregation.

Trade Error Corrections

MDX Wealth, through its custodial firm(s), seeks to execute transactions as instructed by the investment advisor representative or client in accordance with our duty of care. However, it is possible that on occasion, errors will occur. When MDX Wealth or it’s associates is responsible for a trade error, MDX Wealth, rather than the client, bears the costs and risks of erroneous trades. When a trade error is discovered, the error is documented and corrected as soon as is practically possible. The trade error policy of the broker or custodian will dictate the trade error mechanics. To the greatest extent possible, MDX Wealth will bear the loss on any corrective transaction. In addition, if the transaction results in a net gain, the client will be the beneficiary of such gain if it is within the policies of the custodian to make it so.

Item 13 Review of Accounts

For those clients to whom MDX Wealth provides investment supervisory services, client account reviews are conducted annually and are the responsibility of their Investment Advisor Representative. The Investment Advisor Representative’s supervisor and/or CCO periodically review accounts, at least annually for compliance purposes. All investment advisory clients are reminded that it remains their responsibility to advise MDX Wealth of any changes in their investment objectives, risk tolerance, employment and financial situation as well as any other information that may impact our services and advice. All clients are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their Investment Advisor Representative on an at least annual basis.

We prefer to meet with clients to review their portfolios in a place convenient to our clients, be it their homes, offices or our office. Reviews may include such things as performance, beneficiary, concentration information, and may include outside holdings. Any outside holdings information is for information purposes and is not an official record or statement as the information provided may not be verified independently nor do we take responsibility for providing any services with respect to those outside holdings. These reports are as a courtesy only and not a substitute for custodial statements or tax forms/reports. Review documents may not be used to calculate fees or to complete income tax returns. MDX and its Investment Advisor Representatives

may not provide tax advice and nothing in the reviews should be construed as advice concerning any tax matter. If a conflict arises, the custodial statement will be the final authority as it is the official account record.

MDX Wealth may conduct account reviews on other-than-periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives, financial situation, market corrections and/or client request.

Clients are provided, at least quarterly, with transaction confirmation notices and regular summary account statements electronically or in paper directly from the custodian and/or program sponsor for the client accounts. We urge clients to carefully review the statement received from their custodian, because for tax and other purposes, the custodial statement is the official record of our clients' accounts.

Item 14 Client Referrals and Other Compensation

As referenced in Item 12 above, MDX Wealth may receive an economic benefit from certain Broker/Dealers and or Custodians.

As referenced in Item 5 above, at times, MDX Wealth Management may act as a sub-advisor to other asset managers. MDX Wealth may receive compensation for this arrangement.

As referenced in Item 5 above, MDX Wealth Management may enter into an agreement with another registered investment advisor (the "other advisor") who MDX Wealth believes offers investment management services and expertise which would be beneficial to a MDX Wealth Management client. MDX Wealth may receive compensation for this arrangement.

At times, MDX Wealth Management may pay referral fees to a third-party (non-employee) that solicits investment adviser clients on behalf of MDX Wealth Management, but only if such a solicitor arrangement is in compliance with SEC Rule 206(4)-3 under the Investment Advisers Act of 1940. Under SEC Rule 206(4)-3, a solicitor referral arrangement between MDX Wealth Management and third-party (non-employee) solicitor must be in writing, and include provisions related to the following: (a) the scope of the solicitor's activities; (b) a covenant by the solicitor to perform such activities consistent with instructions of the investment adviser and in compliance with the Investment Advisers Act of 1940 and associated rules; and (c) a covenant by the solicitor to provide the client with a copy of the investment adviser's Form ADV Part 2A and a separate written solicitor disclosure.

A solicitor of a Texas-registered investment adviser must register with the Texas Securities Commissioner and meet all state registration requirements contained in the Texas Securities Act and Rules.

Item 15 Custody

An investment advisor is said to have custody when they are holding a client's funds or securities, directly or indirectly, or have authority to obtain possession of them. MDX Wealth Management does not maintain custody of any client funds directly. Our policy and practice is that all funds, securities, and other assets of our clients are maintained in the name of the client and held for safekeeping at a bank, broker/dealer, or other qualified custodian within the meaning of Investment Advisor Rule 206(4)-2 of the client's choice. MDX Wealth Management does have authority, granted in writing by the client, to only deduct advisory fees as discussed below directly from the clients' account.

Important Information regarding: Standing authorizations for money movement:

A client may authorize MDX to request withdrawals or deposits into and out of their investment account under a standing letter of authorization (SLOA) or other form(s) approved and provided by the custodian or by online entry by the client. This allows MDX to carry out a client's request and the funds are directed by the client's signed authorization or entry on the custodian's website via secure login procedures. MDX Wealth will not at any time change those instructions. At no time will MDX, under any standing letter of authorization "SLOA" send money to the firm or to the firms' accounts outside of the scope of deducting advisor fees. The custodian and MDX Wealth maintain records of the SLOA's. Further, it is company policy that MDX will not change a client's address with a custodian. Any address changes will be made by using the appropriate custodial form, signed by the client or online by the client via secure login procedures.

All qualified custodians used by MDX Wealth Management, including Schwab and Interactive Brokers, and others as selected by our clients provide periodic account statements. We urge clients to carefully review the statement received from their custodian, because for tax and other purposes, the custodial statement is the official record of our clients' accounts.

MDX Wealth shall have the ability to have its advisory fee for each client debited by the custodian on a monthly or quarterly basis, as the case may be. Clients are provided, at least quarterly, with transaction confirmation notices and regular summary account statements electronically or in paper directly from the custodian and/or program sponsor for the client accounts.

To the extent that MDX Wealth provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by MDX Wealth with the account statements received from the account custodian. The account custodian does not verify the accuracy of the MDX Wealth's advisory fee calculation.

As a consequence of our authority to debit or withdraw fees from a client account, MDX Wealth Management shall take the following actions to ensure compliance with certain regulations:

- 1) The investment adviser shall collect written authorization from the client to deduct advisory fees from the account held with the qualified custodian.
- 2) Each time a fee is directly deducted from a client account, the investment adviser concurrently:
 - a. Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
 - b. Where applicable by regulation sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

MDX Wealth has executed agreements with Schwab and Interactive Brokers to act as custodian for the client's securities and cash. MDX Wealth also has an agreement with Lincoln Financial Group regarding RIA specific annuities.

Item 16 Investment Discretion

Full Trading and Advisory Discretion on Account(s):

The client can engage MDX Wealth Management to provide investment advisory services on a discretionary basis. Prior to MDX Wealth assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming MDX Wealth as the client's attorney and agent in fact, granting MDX Wealth full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage MDX Wealth on a discretionary basis may, at any time, impose restrictions, in writing, on the MDX Wealth's discretionary authority. To the extent that the client imposes restrictions, MDX Wealth

may not be able to manage the account in effecting transactions in a timely manner due to the inability of MDX Wealth to obtain trade approval from the client. **It's important that the client consider and recognizes that this may pose a significant trading risk, and holds MDX Wealth harmless in the event of investment loss under these circumstances.**

Limited Trading on Account(s):

The client can engage MDX Wealth Management to provide investment advisory services on a non-discretionary basis. Under this type of arrangement, the Advisor is authorized, only with prior approval from the client, to buy, sell, trade and allocate in and among securities and products such as: stocks, bonds, mutual funds, sub-advisor's, independent investment managers and/or programs (with or without discretion, depending upon the independent investment manager or program) and other securities and/or contracts relating to the same, on margin (only if written authorization has been granted) or otherwise, and to give instructions in furtherance of such authority to the custodian of the assets. **It's important that the client consider and recognizes that a non-discretionary relationship means the Investment Advisor Representative must receive approval prior to acting on the client's behalf and if the Advisor cannot reach the client the Advisor cannot act until they do receive authorization. This delay may pose a significant trading risk, and the client holds MDX Wealth harmless in the event of investment loss under these circumstances.**

Money movement/ funds transfers are only handled on a Limited/Non-Discretionary basis. The Advisor and its employees can only act to transfer funds at the direction and permission of the client. For Advisory fees, that means a signed agreement, for on demand withdrawals and transfers the permission maybe verbal from the client, if allowed by the custodian and when the client has signed any custodial forms required.

Item 17 Voting Client Securities

As a matter of firm policy, MDX Wealth does not vote client proxies on behalf of advisory clients. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients will receive their proxies or other solicitations directly from their custodian and/or investment company. Clients may contact MDX Wealth to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

MDX Wealth does not solicit fees six months or more in advance of more than \$500 per client

MDX Wealth is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

MDX Wealth has not been the subject of a bankruptcy petition.

Item 19 Requirements for State-Registered Advisers

MDX Wealth Management is registered as an investment advisor in the State of Texas.

Because we are registered with one or more state securities authorities, we are required to supply the following information:

James David Jones CRD # 5894020

Chief Executive Officer of MDX Wealth Management

Born:

1967

Education:

University of Houston

B.S. Interdisciplinary Studies with a Minor in Communication

Business Background:

<u>Dates</u>	<u>Last Title</u>	<u>Company</u>
02/2022 to present	OSJ Supervisor	Bournehill Investment Services, Inc.
10/2012 to present	Chief Executive Officer	MDX Wealth Management
03/2016 to 02/2022	Registered Representative	Callaway Financial Services, Inc
09/2015 to 8/2018	Chief Executive Officer	Synergy Financial
01/2012 to 03/2013	Chief Executive Officer	Trellis Bay Capital
02/2011 to 01/2012	Director of Operations	Wealth Solutions Inc.

Nicole J Pachar CRD # 5551367

Chief Compliance Officer of MDX Wealth Management

Born:

1969

Business Background:

<u>Dates</u>	<u>Last Title</u>	<u>Company</u>
05/2012 to present	Chief Compliance Officer	MDX Wealth Management
2013 to present	CEO	Pachar Consulting, LLC
08/2016 to 10/2017	Operations Specialist	Callaway Financial Services, Inc.
2012 to 04/2013	Accounting Associate	Sulzer Pumps
04/2008 to 04/2012	Transfer Manager	Wealth Solutions Inc.
02/2002 to 03/2008	Accounting Specialist	Black Box/ NextiraOne
05/2001 to 02/2002	Accounting Associate	Simplex-Grinnell
12/1997 to 04/2001	Rebate Manager	CompUSA
01/1996 to 11/1997	Operations Manager	Houston Communications
03/1988 to 12/1995	Electronic Warfare Specialist	US Army

MDX Wealth is not engaged in any business other than providing investment advice. Neither MDX Wealth nor its management has any relationship or arrangement with any issuer of securities not disclosed in Item 10 above.

The other business activities engaged by our Advisers and Officers are listed in Item 10. Collectively, the executive officers and Advisors spend approximately 85% of their available time providing advisory services on behalf of the Adviser, and approximately 15% of their time acting as insurance agents on behalf of various insurance companies.

MDX Wealth Management does not currently offer a performance fee based arrangement for clients.

MDX Wealth Management does not currently offer advisory services to any private funds

Neither MDX Wealth Management, nor its Principals have been found liable in any arbitration claims or been found liable in any investment related civil, SRO, or administrative proceedings.

MDX Wealth Management has developed a Business Continuity Plan (BCP) to address a situation in which a significant business disruption occurs. In this scenario, MDX Wealth will implement various strategies to quickly recover and resume business operations. The BCP addresses many items, including: data backup and recovery; safeguarding customer confidential information; financial and operational assessments; alternative communications with customers and employees; alternate physical location of employees; and ensuring the firm's customers' prompt access to their funds. Significant business disruptions can vary in their scope, such as effecting only the firm's corporate office which is located in a single building, the entire city where our office is located, or a larger area. Depending on the type of disruption, we will transfer our operations offsite, and recover and resume business as soon as possible. Please refer to the complete MDX Wealth BCP for more information.

At MDX Wealth Management we strive to always deal with our clients in a fair and equitable manner. This document outlines our business practices, and discloses the business relationships of both MDX Wealth and its management. To the clearest extent possible, all relationships of MDX Wealth Management and its management that may impair the ability of our representatives to render unbiased or objective advice have been disclosed.