

Form ADV Part 2A
Firm Brochure
September 1, 2021

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

2245 Texas Dr
Sugarland TX 77479
Phone: (713) 877-2526
Email: nicole@mdxwealth.com
Website : www.mdxwealth.com

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 (713) 877-2526 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.

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 by contacting our Chief Compliance Officer, Nicole Pachar at nicole@mdxwealth.com or by calling (713) 877-2526.

There are no material changes since the prior brochure dated April 9, 2021.

Item 3 Table of Contents

Item 1	Cover Page.....	1
Item 2	Material Changes.....	2
Item 3	Table of Contents.....	3
Item 4	Advisory Business.....	4
Item 5	Fees and Compensation.....	5
Item 6	Performance-Based Fees and Side-By-Side Management.....	10
Item 7	Types of Clients.....	10
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss.....	10
Item 9	Disciplinary Information.....	11
Item 10	Other Financial Industry Activities and Affiliations.....	11
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	14
Item 12	Brokerage Practices.....	15
Item 13	Review of Accounts.....	17
Item 14	Client Referrals and Other Compensation.....	18
Item 15	Custody.....	18
Item 16	Investment Discretion.....	19
Item 17	Voting Client Securities.....	19
Item 18	Financial Information.....	20
Item 19	Requirements for State-Registered Advisers.....	20

Item 4 Advisory Business

A. Description of Your Advisory Business

MDX Wealth Management is a DBA. The firm's legal name is Tamarind Advisors LLC a 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 Las Vegas NV 89169

- Crest Retirement Planning: 1600 Airport Freeway Suite 302 Bedford TX 72022

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, individuals and institutions. On a limited bases MDX Wealth may provide assistance in Estate planning, tax mitigation and financial & retirement planning. We are not tax nor legal 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 securities such as, but not limited to: Equities, Bonds, ETFs, Mutual Funds, CD's, and Money Market funds. A client using MDX Wealth maybe be prevented from using certain mutual funds or separate account mangers because they may not be offered by the client's custodian. Please refer to the firms Brokerage Practices (item 12) for additional information about brokerage practices.

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 include but are not limited to:

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

Past performance or dividend history is no guarantee that you will receive any dividend or performance in the future.

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 tolerance and their investment objectives. Options are not suitable for all clients.

Where requested and approved by the client MDX Wealth can use account Margin in managing client accounts. The client must sign the custodian's form(s) to approve margin trading specifically. 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.

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 can charge a fee, either on an hourly basis or on an ongoing basis with clients signed approval.

Sub-advisory Services:

At times, MDX Wealth Management may act as a sub-advisor to other asset managers. Generally, when serving as sub-advisor, MDX Wealth does not have a direct relationship with the other manager's clients, and does not generally have contact with those clients. In some cases, however, MDX Wealth Management's level of contact may be significant, and MDX Wealth may even have a direct relationship with the client. Where MDX Wealth does not have a significant, direct relationship with the sub-advised clients, the primary advisor is responsible for establishing the financial circumstances, investment objectives and investment restrictions of each sub-advised client through a client profile, questionnaire, investment policy statement or similar means as well as consultations with clients. Each client may enter into an advisory agreement with the primary advisor which dictates the terms and conditions of the relationship, including the fees paid to and services provided by or through the primary advisor.

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

MDX Wealth may receive compensation from investment advisors via a solicitation agreement if it elects to recommend or select other non-affiliated advisors for its clients.

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. As such, pursuant to State securities regulations, MDX Wealth Management requires any advisors with which it may enter into any agreement with to be registered with the proper State Securities regulatory body or the Securities and Exchange Commission as a Federal covered Advisor.

In such case, MDX Wealth and the other advisor will enter into a written agreement (governed by the provisions of Rule 206(4)-3 under the Advisers Act) with respect to the solicitation activities of MDX Wealth, which may include providing introductions of clients to the other advisor and consulting with the advisor regarding potential introductions.

In most cases, MDX Wealth will continue to provide "client servicing." Client servicing includes providing the client with periodic reports, communicating with the client regarding the other advisor's investment manager services, and providing such other assistance that serves to promote the continual mutual servicing of the client. In consideration of the solicitation and servicing, the other advisor shares with MDX Wealth Management a portion of the investment management fees paid by the client to that manager. In each case, a disclosure statement is provided to the client by MDX Wealth and the other manager that makes clear the fees and the relationship between the two advisors. Please review the MDX Wealth Management Third-Party Advisory Services Solicitor's Disclosure Statement and Client Acknowledgement.

Special Services:

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.

Supporting general financial planning, retirement planning, estate planning and tax & cash flow analysis are services we may provide. We are not financial planners, tax professionals, nor CPA's.

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. MDX Wealth Management does not offer any private offerings at this time.

C. Individual Portfolio Management and Client Investment Restrictions

Client portfolios are managed on an individualized basis. Through discussion and our questionnaire and other documents provided we work with clients to determine an investment strategy that supports the 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.

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

E. Discretionary and Non-Discretionary Assets Under Management

As of September 1, 2021 assets under management totaled \$61,922,194 with discretionary assets under management totaled \$33,321,965 with an additional \$28,600,229 of non-discretionary assets.

Discretionary management is: when the client has given us authority to place trades on their behalf in their accounts.

Non-discretionary management is: when the client must approve whether or not to place the trades we recommend.

Item 5 Fees and Compensation

A. Compensation & Schedule of Fees

Our firm's revenue comes from the investment advisory fees we charge, either as a percentage of assets under management or on an hourly basis, to manage our clients' portfolios. Hourly billing is offered on a very limited basis, and is generally for those clients with specific servicing 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 directly with you. 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 their discretion to waive a fee for an account. These waivers are rare and only under special circumstances. Waivers 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 schedule: The maximum fee MDX Wealth can charge is 2.50%.

<u>Assets Under Management</u>	<u>Annual Fee Rate</u>
\$0- \$1,000,000	2.5%
\$1,000,001 -\$3,000,000	2.0%
\$3,000,001 and Above	1.75%

1. Tier Model: As listed below: (Not to exceed 2.5%) (Retired Model) *

Assets are combined to break the fee as follows:

<u>Assets Under Management</u>	<u>Annual Fee Rate</u>
Tier 1 \$0- \$500,000	2.5%
\$500,001 -\$1,500,000	2.0%
\$1,500,001 - Above	1.75%

***12/11/2017 Update: no tiered fee structure will be utilized going forward. For those clients that signed a tiered agreement, those will be honored.**

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

MDX Wealth Management offers investment advisory services, on a very limited basis, under an hourly fee arrangement. MDX Wealth charges clients at a rate of up to \$500.00 per hour negotiable for these services. Clients shall receive an invoice from MDX Wealth on an at least quarterly basis and the fees are due at that time.

Calculation of Fees- Examples:

Monthly Fee Calculation: Management fee/12= monthly fee percentage. Monthly fee percentage x End of previous month value from custodian’s statement = Monthly Fee.

Example: 1.5% Annual Fee, and \$1,000,000 Account Value.

$$.015/12=.00125 \times \$1,000,000=\$1,250.00$$

Quarterly Fee Calculation: Management fee/4= quarterly fee percentage. Quarterly fee percentage x End of quarter value from custodian’s statement= 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:

Monthly Billed Calculation: Management fee / 12 = Monthly fee %. fee % x initial value= Full fee. Full fee / number of days in month = daily fee rate. Daily fee rate x number of days assets are under management= Fee Billed to Client.

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

Tier Rate Fee Quarterly Fee Calculation: The Quarterly fee percentage is determined by taking the fee/4. Then determine the amounts charged in each breakpoint of the End of Quarter value from the custodial statement. Then multiply the range amount by the Quarterly fee percentage. Add the fees from all calculated tiers to determine the gross fee amount.

Example: 1% up to \$250,000, .75% from 250,001 and above, and End of Quarter Value \$750,000.

Tier 1: $.01/4 = .0025 \times \$250,000 = \625.00 . Tier 2: $.0075/4 = .001875 \times \$500,000 = \$937.50$. Add \$625.00 and \$937.50 = \$1,562.50

Fee Schedule -Variable Annuities

This section applies to only those annuities to the extent that the ADVISOR offers sub-account advisory management to CLIENTs who hold traditional Variable Annuity investment products, the ADVISOR may elect to recognize a 12-month “quiet period” beginning from the start date of participation in the Variable Annuity Investment. If a quiet period is recognized, from the inception of the investment, no advisory fees are charged to manage the sub-account allocation for the following 12 months. Beginning from the first day of the 13th month, the ADVISOR will then include the Variable Annuity value in calculation of the total AUM for the client, and bill fees as appropriate on an hourly rate, monthly or quarterly basis. The fee due for management of an annuity can be deducted from either the annuity or from other managed account(s) held by the same client. A quiet period is not required for Advisor only Variable Annuities.

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.

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

B. Methods of Compensation and 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.

- **Billing**: For clients who choose the billing method for fees, 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 invoice arrangement. The invoice is due upon receipt, and checks may be sent to:

MDX Wealth Management
2245 Texas DR Suite 300
Sugarland TX 77479

Frequency

Advisory fees are deducted or billed monthly or quarterly, with the majority of fees being deducted quarterly. Hourly fees can be invoiced ad hoc, monthly or quarterly.

C. Other Types of Fees or Expenses Clients May Pay

Performance Based Fee Arrangements:

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

Annuities

For annuity products, the annuity company and underlying funds charge their own fees and expenses, these are independent of our advisory fees. MDX Wealth does not share in the companies' fees or expense.

Sub-advisory Services and Solicitors Fees:

The total amount of fees paid by clients receiving sub-advisory services from MDX Wealth Management through these agreements varies but, where an asset-based fee is paid to the primary advisor, the total fee (including both the advisor's and MDX Wealth's fee) will not be less than the advisory fee which that client would have paid to MDX Wealth for its advisory services absent the sub-advisory relationship. In these cases, MDX Wealth is generally paid a fee by the primary advisor in accordance with the fee schedules above but MDX Wealth may offer a discount from such fee schedules in recognition of the primary advisor's assumption of certain administrative functions that would otherwise be provided by MDX Wealth. These fees may be paid either in advance or arrears and, if an arrangement is terminated during a particular payment period, a pro rata adjustment will be made to ensure that fees are paid only for the period in which assets were actually under MDX Wealth Management's management.

Custodian, Brokerage Fees & 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 client will incur all or some of these fees. This is not a complete list. The following lists some 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 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, none of our employees directly receive any compensation from the purchase or sale of securities or investments for our clients. 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 activation fee has been charged by the ADVISOR, nor will one be charged when setting up accounts with the ADVISOR at this time. See Item 12 of this brochure regarding brokerage practices. See Section XXX regarding indirect introducing broker compensation and the conflict of interest applying to the owner, James David Jones. (wording)?

Security Expense and Fees

The fees charged by MDX Wealth do not include fees charged by any exchange-traded fund, mutual fund, or other investment vehicle. Each security, where applicable, discloses fees and expenses in their respective fund prospectus and/or fact sheet. Clients are advised to read these materials carefully before investing.

Custody

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.

D. Advance Fees, Termination and Refund

Clients must pay advisory fees in advance.

Either the client or the firm may cancel the client's investment advisory agreement with 30 days' prior written notice. Upon termination, any unearned prepaid fees will be refunded. The client has the right to terminate an agreement without penalty within five business days after entering in the agreement.

If the advisory agreement is terminated before the end of the billing period MDX Wealth will calculate the refund using the following method. Take the daily fee rate and multiply that by the number of days left in the billing period. That amount would be the refund due the client.

Example 1: Client x sends notice on Sept 1st to end the agreement. Client is on quarterly billing and has been advanced billed for July 1st thru September 30th. In this case since the 30 days ends on Sept. 30th, and the client only prepaid thru September 30th, no refund is due.

Example 2: Client x sends notice on January 10th to end the agreement. Client is on quarterly billing and has been advanced billed for January 1st thru March 31st. The daily fee for this client is \$6.00/ day. There are 80 days remaining in the quarter (Jan 31, Feb 28, Mar 31). $80 \text{ days} \times \$6.00/\text{day} = \text{a refund of } \$480.$

E. Important Disclosure: Indirect Compensation and Conflicts of Interest

As of 3/2018 Callaway Financial is the Introducing Brokerage firm for MDX Wealth at Interactive Brokers. As the Introducing Broker, Callaway Financial, Inc. collects some portion of commissions from advisory trading activity with Interactive Brokers. No one at MDX Wealth get any direct payment of these commissions or fees from trading.

1. James David Jones is a shareholder at both MDX Wealth and Callaway Financial. This represents a conflict of interest for Mr. Jones. This gives Mr. Jones an incentive to recommend Interactive Brokers as the custodian/ broker dealer rather a recommendation based on a client's needs. To address this conflict, we disclose the relationship between Mr. Jones and Callaway Financial as introducing broker in clear plain English. The custodian also provides disclosures.
2. Clients are reminded that they have the option of purchasing investment products that we recommend through other brokers or agents that are not affiliated with you. Clients may also receive similar advisory services from other investment advisors, and lower fees for comparable services may be available from other sources. Clients may also select another custodian.
3. MDX Wealth revenue does not result from any commissions or other compensation for the sale of investment products we recommend to our clients, including asset-based distribution fees from the sale of mutual funds.
4. Since the firm does not receive any commissions or other compensation for the sale of investment products there are no reductions in advisory fees.

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

We do not generally have any 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 our fee-based arrangement for managing assets may not be the best choice for them. We do offer hourly fees on a limited basis for special services in part to help lower costs for those with a small amount to invest or a one-time need for investment advice. Lower fees for comparable services may be available from other sources.

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

A. Methods of Analysis

MDX Wealth Investment Advisor Representatives various sources of data to perform investment, economic and market analysis, such as market research materials prepared by others, analysts' reports, financial newspapers and websites, news outlets, corporate ratings services, annual company reports, and prospectuses. There is no specific approach to investing that guarantees success or positive gains. Investing involves risk of loss and clients should be prepared for and investigate the specific risks involved.

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 Aegis Capital as well as other resources. TD Ameritrade and Interactive Brokers provide access to analysts reports such as Thompson Reuters, CRFA and The Street.

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 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.

B. Investment Strategies

In managing your portfolio assets, your Investment Advisor Representative may use a variety of investment securities and strategies to implement for your investment goals and requirements. The following list is an example of the types of securities and/or strategies that may be used in various way:

These strategies include:

Stocks

- Individual common stocks & warrants
- Exchange-Trade Funds (EFT's) and Mutual Funds which own a portfolio or "basket" of common stocks
- Non-Diversified ETF's and Mutual Funds

Bonds

- Tax-Free and taxable municipal bonds
- U.S. government bonds
- Federal Agency bonds
- Corporate bonds
- Collateralized mortgage bonds (CMOs)

Cash and Cash Equivalents

- Short-term U.S. government and corporate obligations
- Money market funds
- Certificates of Deposit

- "core" equities strategy- holding assets which track the overall market for an extended time horizon
- Blended Investing to hold both growth and value securities
- Long Term Investing (securities held at least 1 year)
- Short Term Investing (securities held less than a year)
- Trading (securities sold within 1-45 days)
- Put & Call options for additional income and hedging market loss

Since we are not constrained by investment size, style, or geography, we can identify the best investment opportunities available in the market. We trend generally towards long-term investors and less towards trading investors. Below we discuss some of these securities and strategies and their risks. This is not a complete list; it is important that you do your research. Do not invest in something you do not understand or that your Investment Advisor Representative cannot explain to you to a reasonable level of comfort.

C. Material Risks

Equity Securities

Investing in individual companies involves inherent risk. These risks include capitalization, quality of the company's management, quality and cost of goods and services, regulatory risk, volatility of the industry and other general risks of equity securities. It is possible for an equity's share price to lose all of its value.

Exchange-Traded Funds "ETFs"

An ETF holds a portfolio of securities (a basket) designed to follow a market segment or index. Depending on the portfolio and its size, and ETF can have wide price fluctuations. ETFs require more frequent portfolio reporting by regulators and are thereby more susceptible to actions by hedge funds that could negatively impact the price of an ETF. Certain ETF's may employ leverage, which adds to the volatility and price risk, depending on the amount of leverage used, the liquidity and the collateral. ETF's have imbedded tax complications thru capital gains which would need to be distributed to the fund holders, creating an unexpected tax bill. Not all ETF's have the same liquidity or trading volume and an investor may run into problems selling their position. Before investing in ETF's be sure to research and think about how the ETF achieves its stated objectives and whether those objectives are consistent with your goals.

Bond Securities

Although bonds are considered “safe” or low risk, there are pitfalls, such as interest rate risk. When interest rates rise, bond prices generally fall. A change in interest rates may reduce (or increase) the market value of the bond you hold. Call risk, when the bond's principal is repaid early, but there may not be able to find a similar bond with as attractive a yield. Default and Credit risk- most bonds face the possibility of default, meaning the issuer will either be late paying the investor interest, pay a reduced amount, or be unable to pay at all. The firm uses the ratings of bonds to assist us in exploring the risk involved, but ratings are no guarantee of payment.

Cash and Cash Equivalents

Cash equivalents are investment securities meant for short-term investing; they have high credit quality and tend to be more liquid. Banks and most credit union deposits are federally insured up to a set limit and can offer liquidity, making it easy to get to your funds. Cash equivalents are not insured in most cases and include such as: Treasury bills, Certificates of Deposit (CD's), Treasury notes, and money market funds. Some CDs are insured. Many marketable CDs are not insured. These securities can offer a better return than cash sitting in an account. It is possible to lose your principal investing in cash equivalents.

Risk of Loss-General

When you invest, you make choices about what to do with your money. Risk is any uncertainty with regard to an investment and the potential to negatively affect on your money or assets. The level of risk related to a particular security or class of securities usually links directly to the level of return that might be realized. You cannot eliminate risk. 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.

Margin Risk

Clients may elect to allow trading on margin. 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. Investors should be aware of the greater potential for loss and the possibility of a margin call.

Options Risk

Investment Advisor Representatives may recommend or purchase options for accounts if it meets the clients' goals, risk and other criteria. 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.

Trading Risk

Trading- buying and selling securities in a short period of time, can affect investment performance, specifically costs associated with transactions and taxes will be increased when short term trading.

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 James David Jones- CEO

No disciplinary disclosures for Nicole J Pachar- CCO

Item 10 Other Financial Industry Activities and Affiliations

A. Registrations with FINRA Member Broker-Dealers

Mr. James David Jones CRD# 5894020 is registered with Callaway Financial Services, Inc. DBA Synergy Securities CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm.

This relationship may create a conflict of interest in that I am an owner and an employee of both firms. As such, I may spend the majority of my time working for one particular firm to the detriment of the other.

In addition, the fee structure of MDX Wealth Management may allow Mr. Jones to charge a client a higher fee. This difference in fee structure also may create a conflict of interest and may be incented to place clients with MDX Wealth Management, which potentially may result in a higher fee structure for the client.

All clients are reminded that it is their option to choose either Synergy Financial LLC or MDX Wealth Management as their registered investment advisor if they elect to become my advisory client. No client is under any obligation to enter into an advisory agreement with MDX Wealth Management or Synergy Financial LLC.

Mr. Jones is a registered representative of Callaway Financial Services, Inc. CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm. As such, he 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 (Callaway Financial Services) 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.

Ms. Maria Dembski CRD# 3023270 is registered with Callaway Financial Services, Inc. DBA Synergy Securities CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm. In addition, Ms. Dembski is registered with Huckin Financial Group, Inc. IARD# 8593 as an Investment Adviser Representative and Registered Representative and Starlight Funding Investments, LLC CRD #103957 as a Registered Representative.

Ms. Dembski is engaged by MDX Wealth Management, Huckin Financial Group, Inc., Starlight Funding Investments, LLC, and Callaway Financial Services, Inc. strictly under the capacity of a compliance consultant. As such, Ms. Dembski has no direct contact with clients of any of the listed firms, therefore she would not be in a position that would represent a conflict of interest to any of the listed firms or their clients.

Timothy C Hobbs, CRD #2531874 is registered with Callaway Financial Services, Inc. DBA Synergy Securities CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm.

Mr. Hobbs is a registered representative of Callaway Financial Services, Inc. DBA Synergy Securities CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm. As such, he 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 (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.

Orlando Molina, CRD #2702165 is registered with Callaway Financial Services, Inc. DBA Synergy Securities CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm.

Mr. Orlando is a registered representative of Callaway Financial Services, Inc. DBA Synergy Securities CRD# 104003 a Broker-Dealer registered with the State of Texas and a FINRA member firm. As such, he 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 (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.

B. Futures and Commodities

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.

C. Arrangements and Relationships -Material Conflicts

As of 3/2018 Callaway Financial is the Introducing Brokerage firm for MDX Wealth Management at Interactive Brokers. As such the Introducing Broker, Callaway Financial, Inc. may collect reasonable commissions from advisory trading activity with Interactive Brokers. MDX Wealth nor its contracted Investment Advisor Representatives, except those listed above and below, get any of these commissions or fees from trading. This may represent a conflict of interest for Mr. Jones as shareholder with both firms. 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. Clients may also select another custodian.

Licensed Insurance Agents.

Mr. James David Jones TDI license # 1710626 is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis.

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 is a 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 is a licensed insurance agent and may recommend the purchase of certain insurance-related products on a commission basis.

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.

We have negotiated relationships with third-party custodial firms. MDX Wealth is not affiliated with these custodial firms. The custodial firms are: TD Ameritrade Institutional and Interactive Brokers. These firms hold 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. These firms also provide us access to reports, analysis and other research tools as customers of the respective custodians. This does include discounts for related services, such as DocuSign and LaserApps, to list just two companies.

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.

Advisory Services -Unregulated Investments.

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

D. Selection of other Advisors, Solicitation, and Client Servicing Arrangements

MDX Wealth may receive compensation from investment advisors via a solicitation agreement if it elects to recommend or select other non-affiliated advisors for its clients.

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. As such, pursuant to State securities regulations, MDX Wealth Management requires any advisors with which it may enter into any agreement with to be registered with the proper State Securities regulatory body or the Securities and Exchange Commission as a Federal covered Advisor.

In such case, MDX Wealth and the other advisor will enter into a written agreement (governed by the provisions of Rule 206(4)-3 under the Advisers Act) with respect to the solicitation activities of MDX Wealth, which may include providing introductions of clients to the other advisor and consulting with the advisor regarding potential introductions.

In most cases, MDX Wealth will continue to provide "client servicing." Client servicing includes providing the client with periodic reports, communicating with the client regarding the other advisor's investment manager services, and providing such other assistance that serves to promote the continual mutual servicing of the client. In consideration of the solicitation and servicing, the other advisor shares with MDX Wealth Management a portion of the investment management fees paid by the client to that manager. In each case, a disclosure statement is provided to the client by MDX Wealth and the other manager that makes clear the fees and the relationship between the two advisors. Please review the MDX Wealth Management Third-Party Advisory Services Solicitor's Disclosure Statement and Client Acknowledgement.

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

A. Factors in Selecting or recommending broker-dealers

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 affect 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.

1. Research and other Soft Dollar 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.

2. 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.

Our custodians may refer potential clients to our firm. This is an infrequent occurrence for the firm. We do not trade referrals for directing client transactions to a particular broker-dealer. It is a benefit of the relationship but is not a requirement for the firm to maintain the relationships. MDX Wealth may receive referrals from broker-dealers and recognizes that this may create a conflict of interest.

3. Directed Brokerage

A. Recommending, requesting or requiring a specified Broker-Dealer

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. The Investment Advisor Representatives trade exclusively on the custodial platforms the firm has approved relationships with.

B. Client Directed brokerage

Clients can purchase securities or insurance products recommended by MDX Wealth through other, non-affiliated broker-dealers or insurance agents. If a client purchased a product from another broker-dealer the firm may be unable to achieve most favorable execution of client transactions.

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 at times accept directed brokerage arrangements (when a client requires that account transactions be affected 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.

C. Aggregate Trading

To the extent that MDX Wealth provides investment management services to its clients, the transactions for each client account generally will be affected 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 client’s 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 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 within the policies of the custodian the client may do so.

Item 13 Review of Accounts

A. Periodic Frequency

For those clients to whom MDX Wealth provides investment supervisory services, account reviews are conducted annually and are the responsibility of their Investment Advisor Representative. The Investment Advisor Representative’s supervisor and CCO also periodically review accounts. All investment advisory clients are reminded that it remains their responsibility to advise MDX Wealth of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with MDX Wealth on an at least annual basis.

B. Other than Periodic Reviews

Review of a clients account may be done more frequently. Certain activities and actions can trigger reviews, such as:

- Changes in client financial circumstances
- Changes in financial goals
- Life events such as divorce, death or birth
- Client request
- Estate request

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.

C. Reports

Reviews may include such things as performance, beneficiary, concentration information, and may include outside holdings. Statements used are the custodial statement. If an Investment Advisor Representative provides a consolidated summary of assets it relies on the information provided by the custodian, the customer, or an aggregate system. The firm does not validate all summary information. 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 assets. MDX and its Investment Advisor Representatives may not provide tax advice, and nothing in the reviews should be construed as professional advice concerning any tax matter. If a conflict arises, the custodial statement will be the final authority as it is the official account record. 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. Most of these reports are online. Some maybe written.

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

A. Economic benefit to clients

As referenced in Item 12 above, MDX Wealth may receive an economic benefit from certain Broker/Dealers and or Custodians. The clients also may have access to the research and reports provided by the 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.

B. Compensation for referrals

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.

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 practices are 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.

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 TD Ameritrade 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 TD Ameritrade 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 written trade approval from the client. The client 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 consultation with 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.

All types of discretion are limited in that they do not extend to the withdrawal or transfer of funds.

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. 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 of more than \$500, per client, six months or more in advance.

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>
03/2016 to present	Registered Representative	Callaway Financial Services, Inc
01/2016 to present	President	MDX Holdings Inc.
10/2012 to present	Chief Executive Officer	MDX Wealth Management
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.
06/2006 to 04/2010	Market Manager	Capital One Bank

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.