

## Item 1 Cover Page

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**This brochure provides information about the qualifications and business practices of WHealthy Empowerment Network. If you have any questions about the contents of this brochure, please contact us at (419) 340-6462. 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 as a registered investment advisor does not imply a certain level of skill or training.**

**Additional information about WHealthy Empowerment Network also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Material Changes**

Since the last filing of this brochure on September 09, 2025, the following changes have occurred:

- Item 4 client assets under management have been updated.

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#### Brochure

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#### **Item 4 Advisory Business**

WHealthy Empowerment Network is an investment advisor firm registered in the states of Illinois, Wisconsin, Ohio and Arizona, since March 2025.

The principal owners of WHealthy Empowerment Network are Erin Zylka, CFP®, AIF®, Managing Partner, and Elizabeth Schneider, CFP®, Managing Partner. Ms. Zylka does business for WHealthy Empowerment Network through a “doing business as” (dba) name, Kona Financial Planning. Ms. Schneider does business for WHealthy Empowerment Network through dba name Infinity Wealth Company, LLC.

##### Advisory Services

WHealthy Empowerment Network’s (or “Advisor”) principal service is providing fee-based investment management and comprehensive financial planning services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client’s objectives. The Advisor’s primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor may use any of the following to accomplish this objective: exchange listed securities, over-the-counter securities, foreign securities, warrants, corporate debt securities, commercial paper, CDs, , municipal securities, mutual funds, United States government securities, and options in securities. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager’s tenure, and/or overall career performance. The Advisor may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may recommend specific stocks to increase sector weighting and/or dividend potential. The Advisor may recommend employing cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance.

While the Advisor will provide ongoing supervision and management of existing legacy positions in certain securities products (e.g., existing variable life insurance, variable annuities, and limited partnerships investing in real estate and oil and gas interests). However, the Advisor will not recommend new investments in such products and will not accept commissions or other charges on the sale of those products. Investment advisor representatives are not insurance licensed and will not recommend investments in any specific insurance product.

The Advisor will analyze each client’s unique investment profile to determine whether concentration limits should apply to asset allocations. Facts and circumstances differ for each client and concentration limits may not be applicable to the managed account. Some securities issuers require investors to meet a certain threshold on annual income or net worth (for example, “accredited investors” and “qualified clients”). WHealthy Empowerment Network will only recommend investments where the investment is suitable, and the client meets the issuer’s applicable investor requirements.

### Financial Planning and Consulting

In addition to investment management services where comprehensive financial planning is inclusive in the advisory fee, WHealthy Empowerment Network may provide separate financial planning and consulting services to some of its clients. The Advisor's financial planning and consulting services may include recommendations for portfolio customization based on the client's investment objectives, goals and financial situation, recommendations relating to investment strategies as well as tailored investment advice. Financial planning and consulting may also include non-investment advice such as developing strategies to achieve retirement or other financial goals, tax optimization strategies, cash flow and budgeting analysis and recommendations, financing and financial education, estate planning, and asset protection strategies. Not all clients will receive a written financial plan or report. For example, the scope of services may limit the Advisor to providing only in-person consultations in order to keep fees lower for the client. Alternatively, the client may request a written report for consulting services, or a written financial plan for financial planning services. The Advisor's scope of services, as agreed in writing with the client in the Financial Planning Agreement, will determine how the client is provided with discussion and analysis of their financial planning and consulting needs.

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WHealthy Empowerment Network will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

WHealthy Empowerment Network does not provide portfolio management services to wrap fee programs.

As of December 31, 2025, WHealthy Empowerment Network had \$106,048,400 of client assets under management on a discretionary basis.

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

#### Investment Management Fees

Pursuant to an investment advisory contract signed by each client, the client will pay WHealthy Empowerment Network an annual management fee, payable quarterly in advance. New account fees will be prorated from the inception of the account to the end of the first quarter.

The structure and level of our advisory fee will vary by client based upon the services provided and other considerations deemed relevant by WHealthy Empowerment Network and the Investment Advisor Representative managing the client relationship, but will typically take the form of a percentage of assets under management ranging from 0.5% to 1.5% per annum. For example, a client with a family member requiring long-term care may need consistent income generation from their investments; conversely, a client with no children and high income may not need access to funds for 20+ years and could withstand 5+ years of their investment principal being locked up in an alternative investment. Even if both clients have the same amount of assets under management at the firm, WHealthy Empowerment Network's investment recommendations will

will vary substantially. Furthermore, while conservative investments in U.S. Government bonds tend to require less oversight, investments in alternative assets require deep research and due diligence prior to directing capital towards the investment. Thus, the time and complexity required to advise these two different clients is a consideration deemed relevant by WHealthy Empowerment Network's when determining the management fee that will be agreed in the investment advisory contract.

The specific manner in which WHealthy Empowerment Network's fees are charged is established in the investment advisory contract. For certain clients, fees will be calculated based on the value of portfolio assets of the account managed by the Advisor as of the close of business on the last business day of the preceding quarter, multiplied by a breakpoint tiered schedule of fees. For other clients, fees will be calculated at the beginning of each calendar year and clients will be charged on a fixed fee basis (payable quarterly). For example, a \$200,000 account billed on a fixed fee basis at a rate of 0.9% would be calculated as follows:  $(\$200,000 \times 0.9\%) / 4 \text{ quarters} = \$450 \text{ per quarter}$ . The Advisor's fee rate may be adjusted if there is a decline in the value of the client's account, and will be discussed and agreed with the client in advance.

These fees are negotiable. Investment management fees will be directly deducted from the client account on a quarterly basis by the qualified custodian. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian. The custodian will send a statement at least quarterly to the client and the Advisor will also send an invoice to the client outlining the fee calculation and time period covered, and the amount withdrawn from the client account each time the fee deduction invoice is sent to the qualified custodian.

Clients will receive comprehensive financial planning services as a complement to the advisory fee paid for investment management.

#### Financial Planning and Consulting Fees

WHealthy Empowerment Network will charge a fixed fee for financial planning and consulting services in the range of \$3,000 to \$5,000 as negotiated and contracted for with the client. Financial planning and consulting fees are based on the estimated number of hours it will take to complete the financial plan or report, as well as the type and complexity of the services. In addition to a higher fixed fee being based on the added complexity of advanced services, a higher fixed fee will be based on the additional time expected to complete the services. Complexity of services is considered regardless of the level of client assets being managed by the Advisor, if any.

Where the complexity, time, and effort required to provide the services will, at the discretion of the Advisor, exceed \$5,000 in fees, the Advisor will discuss this with the client in advance and agree to a higher fee range. For example, a small business owner client requesting consulting services that include valuation of the business and planning and preparation for the sale of the business will incur additional fees and costs associated with the valuation services, charged by a third-party valuation firm, and the Advisor will, as liaison with the third-party valuation firm, spend additional time managing the relationship and analyzing the valuation results, as well as rendering advice on the various aspects and consequences of the business sale. Furthermore, the Advisor, as liaison between the client and the client's third-party accountant/CPA firm, would develop a financial plan based on the planned proceeds of the sale and with tax consequences in

mind. These services are generally beyond the scope of services for most clients, and would increase the complexity and time required (and therefore the fees) by the Advisor to provide such services.

Financial planning and consulting services may be provided on a one-time basis or an annual recurring basis. One-time fixed fee-based clients are billed in advance at the time of signing the agreement with the Advisor. Annual recurring fixed fee-based clients are billed quarterly, in advance. If the client terminates the Agreement with the Advisor prior to the Advisor's completion of the financial planning services, the Advisor will refund to the client a pro-rata share of the fee the client paid. The Advisor will refund the pro-rata fee to the client within five days of delivery of the financial plan.

For each of the Advisor's services described above, the Client may terminate these services within five business days of the effective date of an Agreement signed with the Advisor without any payment of the Advisor's fee.

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All fees paid to WHealthy Empowerment Network for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of variable insurance products. These fees and expenses are described in each fund's or variable product's prospectus. These fees will generally include a management fee and other fund expenses. Client is responsible for all expenses related to the ordinary servicing of the account, including custodial and securities transaction fees charged by the custodian and executing broker-dealer, and/or platform fees. Other non-ordinary fees or fees incurred at the direction of the Client shall be paid by the Client. The Advisor's fee is separate and distinct from the custodian and execution fees.

A client may be able to invest in products recommended by the firm directly, without the services of WHealthy Empowerment Network, and these services may be available through other firms not affiliated with WHealthy Empowerment Network. In that case, the client would not receive the services provided by WHealthy Empowerment Network, which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives.

At no time will WHealthy Empowerment Network accept or maintain custody of a client's funds or securities except for authorized fee deduction.

WHealthy Empowerment Network's fees are payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any unearned fees will be refunded to client.

Neither WHealthy Empowerment Network nor its supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

WHealthy Empowerment Network does not charge performance-based fees.

## **Item 7 Types of Clients**

The Advisor will offer its services to individuals, trusts, estates, charitable organizations, and corporations or other business entities.

The Advisor does not have any minimum requirements for opening or maintaining an account.

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

The Advisor may utilize fundamental, technical, or cyclical analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of a business involves analyzing its financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives: to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions; and to calculate its credit risk.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns as compared with the recent past.

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals. However, the client should be aware that with any trading that occurs in the client account, the client will incur transaction and administrative costs.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).



Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

The primary risks in technical analysis are that the factors used to analyze the price, trends and volatility of a security may not be replicated, or the outcomes of such analysis will not be the same as in past periods where similar combinations existed. Because of the reliance on trends, technical analysis can signal buying at market peaks and selling at market troughs.

In cyclical analysis, economic or business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. Also, the lengths of the economic cycles may be difficult to predict with accuracy. Therefore, the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks. Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The primary risks faced by investors include:

#### Business Risk

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

#### Volatility Risk

Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out

of every three years. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

#### Inflation Risk

Inflation is a general upward movement of prices. Inflation reduces purchasing power, which is a risk for investors receiving a fixed rate of interest. The principal concern for individuals investing in cash equivalents is that inflation will erode returns.

#### Interest Rate Risk

Interest rate changes can affect a bond's value. If bonds are held to maturity the investor will receive the face value, plus interest. If sold before maturity, the bond may be worth more or less than the face value. Rising interest rates will make newly issued bonds more appealing to investors because the newer bonds will have a higher rate of interest than older ones. To sell an older bond with a lower interest rate, you might have to sell it at a discount.

#### Liquidity Risk

This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products. It may also be the case with products that charge a penalty for early withdrawal or liquidation such as a certificate of deposit (CD).

The Advisor does not primarily recommend a particular type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

### **Item 9 Disciplinary Information**

Neither WHealthy Empowerment Network nor its management persons have had any legal or disciplinary events, currently or in the past.

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

Neither WHealthy Empowerment Network nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither WHealthy Empowerment Network nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

WHealthy Empowerment Network does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities

dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund” and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

WHealthy Empowerment Network does not recommend or select other investment advisors for clients.

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

WHealthy Empowerment Network is registered as a state registered investment advisor and has adopted as an industry best practice a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the Advisor. In addition, the Code of Ethics governs personal trading by each employee of WHealthy Empowerment Network deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of WHealthy Empowerment Network are conducted in a manner that avoids any conflict of interest between such persons and clients of the Advisor or its affiliates. WHealthy Empowerment Network collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. WHealthy Empowerment Network will provide a copy of the Code of Ethics to any client or prospective client upon request.

WHealthy Empowerment Network does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

WHealthy Empowerment Network and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of WHealthy Empowerment Network can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the investment advisor representatives. To mitigate these conflicts, WHealthy Empowerment Network has adopted a Code of Ethics as noted above. WHealthy Empowerment Network’s Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client’s interest before those of the firm and themselves.

WHealthy Empowerment Network requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment advisor representatives of WHealthy Empowerment Network may trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, WHealthy Empowerment Network’s policy is to

require the trading of all relevant client accounts prior to the trading of their own accounts. The Chief Compliance Officer examines personal trading activities of WHealthy Empowerment Network's personnel to verify compliance with this policy.

## **Item 12 Brokerage Practices**

If requested by the client, WHealthy Empowerment Network may suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. WHealthy Empowerment Network will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor and client in making its suggestion. WHealthy Empowerment Network intends to recommend that our clients use Charles Schwab & Co., Inc., a registered broker-dealer, member SIPC, as the qualified custodian.

### **The custodian and brokers we use**

WHealthy Empowerment Network does not maintain custody of your assets, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we can still use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

### **How we select brokers/custodians**

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices

- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

### **Your brokerage and custody costs**

For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds, ETFs, and online stock and options trades) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. For some accounts, Schwab may charge you a percentage of the dollar amount of assets in the account in lieu of commissions. In addition to commissions and asset-based fees, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker/dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

### **Products and services available to us from Schwab**

Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services:

#### **Services that benefit you**

Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

#### **Services that may not directly benefit you**

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts,

including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting

### **Services that generally benefit only us**

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees.

### **Our interest in Schwab's services**

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/custodians") and not Schwab's services that benefit only us.

WHealthy Empowerment Network may receive proprietary research services or other products as a result of recommending Schwab, which may result in the client paying higher commissions than those obtainable through other brokers. If WHealthy Empowerment Network does receive such products or services, it will follow procedures which ensure compliance with Section 28(e) of the Securities Exchange Act of 1934 or applicable state securities rules.

The firm seeks to obtain the most favorable net results for clients' price, execution quality, services and commissions. Although the firm seeks competitive commission rates, it may pay commissions on behalf of clients which may be higher than those available from other brokers in order to receive other services. The firm may enter into such transactions so long as it determines in good faith that the amount of commission paid was reasonable in relation to the value of the brokerage and research services provided by the broker. The services that may be considered in this determination of reasonableness may include (1) advice, either directly or through publications or writing, as to the value of securities, the advisability of investing in, purchasing or selling securities, and the availability of securities or purchasers or sellers of securities; (2) analysis and reports concerning issuers, industries, securities, economic factors and trends, portfolio strategy, and the performance of accounts; or (3) effecting securities transactions and performing functions incidental thereto. Such research furnished by broker-dealers may be used to service any or all of WHealthy Empowerment Network's clients and may be used in connection with accounts other than those that pay commissions to the broker-dealers providing the research. In particular, third-party research provided by broker-dealers may be used to benefit all of the firm's clients. This creates a conflict of interest in that the firm has an incentive to select or recommend a broker-dealer based on its interest in receiving the research or other products or services, rather than on the clients' interest in receiving most favorable execution.

Benefits received may be used as soft dollars provided that:

- The service is primarily for the benefit of WHealthy Empowerment Network's clients
- The commission rates are competitive with rates charged by comparable broker-dealers; and
- WHealthy Empowerment Network does not guarantee a minimum amount of commissions to any broker-dealer.

WHealthy Empowerment Network does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

WHealthy Empowerment Network recommends that all clients use a particular broker-dealer for execution and/or custodial services. The broker-dealer is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to WHealthy Empowerment Network to direct all transactions through that broker-dealer in the investment advisory agreement.

As an investment advisory firm, WHealthy Empowerment Network has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. WHealthy Empowerment Network's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. WHealthy Empowerment Network may not necessarily pay the lowest commission

or commission equivalent as specific transactions may involve specialized services on the part of the broker.

WHealthy Empowerment Network does not permit clients to direct brokerage.

WHealthy Empowerment Network may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of WHealthy Empowerment Network's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. WHealthy Empowerment Network may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

### ***Trade Error Policy***

We have internal controls for the prevention of trade or model allocation errors, however, on occasion, errors may occur. We recommend that you regularly review your custodial statements. In the event you identify an error, you have 90 days from your statement date to notify us of its existence. Upon notification, we will perform an analysis of the reported discrepancy. If the Firm is responsible for the error, we will seek to correct the error in a way that returns your account to where it would have been had the error not occurred. If you notify us of a potential error more than 90 days after your statement date and the Firm is responsible for the error, the Firm will reimburse you for any damage caused to your account from the date of the error through 90 days after your statement date. We maintain a record of identified errors, including details of the original transaction and the corrective actions. The trade error resolution process varies depending on the policies and practices of the custodian where the relevant client account is maintained. Clients may obtain additional information about the trade error policies and practices applicable to their account by contacting the Firm.

### **Item 13 Review of Accounts**

The firm reviews client accounts on a continuous and ongoing basis, but no less frequently than annually or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors may include WHealthy Empowerment Network becoming aware of a change in client's investment objective, a change in market conditions,



change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline. The nature of the review is to determine if the client account is still in line with the client's stated objectives. Financial plans, once prepared and delivered to the client are not reviewed again unless the client requests a financial plan be updated. Client accounts and financial plans are reviewed by Erin Zylka, CFP®, AIF®, and Elizabeth Schneider, CFP®.

The client is encouraged to notify the Advisor and investment advisor representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, insurance companies, broker-dealers, and others who are involved with client accounts. WHealthy Empowerment Network does not deliver separate client reports.

#### **Item 14 Client Referrals and Other Compensation**

WHealthy Empowerment Network is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

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

#### **Item 15 Custody**

WHealthy Empowerment Network does not take or accept physical custody of client funds or securities, but is deemed to have custody by virtue of its ability to withdraw advisory fees directly from client accounts (please see Item 5 which describes the safeguards around direct fee deduction). As noted in Item 13 above, clients will receive statements not less than quarterly from the qualified custodian, and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

#### ***Trade Error Policy***

We have internal controls for the prevention of trade or model allocation errors, however, on occasion, errors may occur. We recommend that you regularly review your custodial statements. In the event you identify an error, you have 90 days from your statement date to notify us of its existence. Upon notification, we will perform an analysis of the reported discrepancy. If the Firm is responsible for the error, we will seek to correct the error in a way that returns your account to where it would have been had the error not occurred. If you notify us of a potential error more than 90 days after your statement date and the Firm is responsible for the error, the Firm will reimburse you for any damage caused to your account from the date of the error through 90 days after your statement date. We maintain a record of identified errors, including details of the original transaction and the corrective actions. The trade error resolution process varies depending on the policies and practices of the custodian where the relevant client account is maintained. Clients may obtain additional information about the trade error policies and practices applicable to their account by contacting the Firm.

## **Item 16 Investment Discretion**

WHealthy Empowerment Network generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by WHealthy Empowerment Network.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by WHealthy Empowerment Network will be in accordance with each client's investment objectives and goals.

## **Item 17 Voting Client Securities**

WHealthy Empowerment Network will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, WHealthy Empowerment Network cannot give any advice or take any action with respect to the voting of these proxies. The client and WHealthy Empowerment Network agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

## **Item 18 Financial Information**

WHealthy Empowerment Network does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance, and is not required to file a balance sheet.

WHealthy Empowerment Network has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If WHealthy Empowerment Network does become aware of any such financial condition, this Brochure will be updated and clients will be notified.

WHealthy Empowerment Network has never been subject to a bankruptcy petition.

## **Item 19 Requirements for State-Registered Advisers**

Erin Zylka, CFP®, AIF®, Managing Partner, was born in 1984. Ms. Zylka earned a Bachelor of Science degree in Biology and Chemistry and a Masters of Business Administration (MBA) degree in Finance from The University of Toledo. Ms. Zylka earned the Certified Financial Planner certificate after attending the College for Financial Planning (2017-2020).

Ms. Zylka co-founded WHealthy Empowerment Network and has served as Managing Partner since December 2024. Ms. Zylka is also the Owner of Zylka Financial Services, LLC dba Kona Financial Planning, since June 2021. Previously, Ms. Zylka has held the following positions:

- Investment Advisor Representative at Mariner Platform Solutions, LLC (06/2021 – 03/2025)
- Investment Advisor Representative at Resolute Wealth Advisor, Inc. (12/2017 – 06/2021)
- Investment Advisor Representative at Strategic Investment Advisors, LLC (06/2012 – 12/2017)
- Investment Advisor Representative at Ameritas Investment Corp. (05/2010 – 06/2012)

Elizabeth Schneider, CFP®, Managing Partner, was born in 1968. Ms. Schneider attended DePaul University (2010 – 2011) and University of Wisconsin, Stevens Point (1986 – 1987) but has no post-high school degree. Ms. Schneider earned the Certified Financial Planner certificate after attending the College for Financial Planning (2001 – 2005).

Ms. Schneider co-founded WHealthy Empowerment Network and has served as Managing Partner since December 2024. Ms. Schneider is also the Owner and Managing Member at Infinity Wealth Company, LLC, since February 2022. Previously, Ms. Schneider has held the following positions:

- Investment Advisor Representative at Mariner Platform Solutions, LLC (03/2022 – 03/2025)
- Partner Advisor at AdvicePeriod (06/2018 – 03/2022)
- Registered Representative at Investment Advisor Representative at CliftonLarsonAllen Wealth Advisors (08/2011 – 12/2012)
- Investment Advisor Representative at Clifton Gunderson Wealth Advisors (10/2001 – 02/2012)
- Registered Representative at CG Brokerage L.L.C. (08/2006 – 08/2011)
- Registered Representative at Cap Pro Brokerage Services, Inc. (07/2001 – 10/2005)
- Registered Representative at Edward Jones (09/1999 – 06/2001)
- Registered Representative at Associated Investment Services, Inc. (12/1997 – 09/1999)
- Registered Representative at Essex National Securities, Inc. (05/1995 – 12/1997)

WHealthy Empowerment Network is not engaged in any other business other than giving investment advice.

Management of WHealthy Empowerment Network have not been found liable in any arbitration, civil or disciplinary actions or administrative proceedings .

There are no material relationships maintained by WHealthy Empowerment Network or its management persons with any issuers of securities.

## **Item 1 Cover Page for Brochure Supplement**

Erin Zylka, CFP<sup>®</sup>, AIF<sup>®</sup>

WHealthy Empowerment Network  
20780 W. Chartwell Drive  
Kildeer, IL 60047

(419) 340-6462

January 27, 2026

**This brochure supplement provides information about Erin Zylka, CFP<sup>®</sup>, AIF<sup>®</sup> that supplements the WHealthy Empowerment Network brochure. You should have received a copy of that brochure. Please contact Erin Zylka if you did not receive WHealthy Empowerment Network's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Erin Zylka is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## Item 2 Educational Background and Business Experience

Erin Zylka, CFP®, AIF®, Managing Partner, was born in 1984. Ms. Zylka earned a Bachelor of Science degree in Biology and Chemistry and a Masters of Business Administration (MBA) degree in Finance from The University of Toledo. Ms. Zylka earned the Certified Financial Planner certificate after attending the College for Financial Planning (2017-2020).

Ms. Zylka co-founded WHealthy Empowerment Network and has served as Managing Partner since December 2024. Ms. Zylka is also the Owner of Zylka Financial Services, LLC dba Kona Financial Planning, since June 2021. Previously, Ms. Zylka has held the following positions:

- Investment Advisor Representative at Mariner Platform Solutions, LLC (06/2021 – 03/2025)
- Investment Advisor Representative at Resolute Wealth Advisor, Inc. (12/2017 – 06/2021)
- Investment Advisor Representative at Strategic Investment Advisors, LLC (06/2012 – 12/2017)
- Investment Advisor Representative at Ameritas Investment Corp. (05/2010 – 06/2012)

Ms. Zylka is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”) and may therefore refer to herself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional. Ms. Zylka may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at [www.cfp.net](http://www.cfp.net).

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

The Accredited Investment Fiduciary® (AIF) Designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF Designation, the individual must meet prerequisite criteria based on a combination of education, industry experience, and/or ongoing professional development, complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the Code of Ethics. In order to maintain the AIF Designation, the individual must annually renew their affirmation of the Code of Ethics and complete six hours of continuing education. The Designation is administered by the Center for Fiduciary Studies, the standards-setting body of fi360.

### **Item 3 Disciplinary Information**

There are no legal or disciplinary events or proceedings to report concerning Ms. Zylka.

### **Item 4 Other Business Activities**

Ms. Zylka is the Owner of Zylka Financial Services, LLC dba Kona Financial Planning, since June 2021. Kona Financial Planning is the “doing business as” (dba) branch office name for Ms. Zylka’s WHealthy Empowerment Network business.

### **Item 5 Additional Compensation**

Ms. Zylka does not receive compensation or other economic benefit from anyone who is not a client for providing advisory services.

### **Item 6 Supervision**

Erin Zylka, CFP®, AIF®, Managing Partner, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor’s compliance program and Code of Ethics of the WHealthy Empowerment Network supervised persons on a continuous basis using various methods, including periodic inspection and review of client securities positions and transaction activity, obtaining certifications of compliance with company

policies and procedures from those supervised, and obtaining and reviewing brokerage statements or transactions and holdings reports of the supervised persons. Erin Zylka can be reached at (419) 340-6462.

#### **Item 7 Requirements for State-Registered Advisers**

Ms. Zylka has not been involved in an award or found liable in an arbitration claim, civil, or self-regulatory organization event or administrative proceeding, or been the subject of a bankruptcy petition.

**Item 1 Cover Page for Brochure Supplement**

Elizabeth Schneider, CFP®

WHealthy Empowerment Network  
20780 W. Chartwell Drive  
Kildeer, IL 60047

Branch Office:  
2821 Post Road  
Stevens Point, WI 54481

(715) 703-9191

January 27, 2026

**This brochure supplement provides information about Elizabeth Schneider, CFP® that supplements the WHealthy Empowerment Network brochure. You should have received a copy of that brochure. Please contact Elizabeth Schneider if you did not receive WHealthy Empowerment Network's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Elizabeth Schneider is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**



## Item 2 Educational Background and Business Experience

Elizabeth Schneider, CFP<sup>®</sup>, Managing Partner, was born in 1968. Ms. Schneider attended DePaul University (2010 – 2011) and University of Wisconsin, Stevens Point (1986 – 1987) but has no post-high school degree. Ms. Schneider earned the Certified Financial Planner certificate after attending the College for Financial Planning (2001 – 2005).

Ms. Schneider co-founded WHealthy Empowerment Network and has served as Managing Partner since December 2024. Ms. Schneider is also the Owner and Managing Member at Infinity Wealth Company, LLC, since February 2022. Previously, Ms. Schneider has held the following positions:

- Investment Advisor Representative at Mariner Platform Solutions, LLC (03/2022 – 03/2025)
- Partner Advisor at AdvicePeriod (06/2018 – 03/2022)
- Registered Representative at Investment Advisor Representative at CliftonLarsonAllen Wealth Advisors (08/2011 – 12/2012)
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- Registered Representative at CG Brokerage L.L.C. (08/2006 – 08/2011)
- Registered Representative at Cap Pro Brokerage Services, Inc. (07/2001 – 10/2005)
- Registered Representative at Edward Jones (09/1999 – 06/2001)
- Registered Representative at Associated Investment Services, Inc. (12/1997 – 09/1999)
- Registered Representative at Essex National Securities, Inc. (05/1995 – 12/1997)

Ms. Schneider is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”) and may therefore refer to herself as a CERTIFIED FINANCIAL PLANNER<sup>™</sup> professional or a CFP<sup>®</sup> professional. Ms. Schneider may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP<sup>®</sup> certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP<sup>®</sup> certification. You may find more information about the CFP<sup>®</sup> certification at [www.cfp.net](http://www.cfp.net).

CFP<sup>®</sup> professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP<sup>®</sup> professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- Examination – Pass the comprehensive CFP<sup>®</sup> Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
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- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

### **Item 3 Disciplinary Information**

There are no legal or disciplinary events or proceedings to report concerning Ms. Schneider.

### **Item 4 Other Business Activities**

Ms. Schneider is also the Owner and Managing Member at Infinity Wealth Company, LLC, since February 2022. Infinity Wealth Company, LLC is the “doing business as” (dba) branch office name for Ms. Schneider’s WHealthy Empowerment Network business.

### **Item 5 Additional Compensation**

Ms. Schneider does not receive compensation or other economic benefit from anyone who is not a client for providing advisory services.

### **Item 6 Supervision**

Erin Zylka, CFP®, AIF®, Managing Partner, Chief Compliance Officer, monitors the investment advisory activities, personal investing activities, and adherence to the Advisor’s compliance program and Code of Ethics of the WHealthy Empowerment Network supervised persons on a continuous basis using various methods, including periodic inspection and review of client securities positions and transaction activity, obtaining certifications of compliance with company policies and procedures from those supervised, and obtaining and reviewing brokerage statements

or transactions and holdings reports of the supervised persons. Erin Zylka can be reached at (419) 340-6462.

#### **Item 7 Requirements for State-Registered Advisers**

Ms. Schneider has not been involved in an award or found liable in an arbitration claim, civil, or self-regulatory organization event or administrative proceeding, or been the subject of a bankruptcy petition.