Direct Indexing Disclosures

Required for accounts invested in:

Brooklyn Investment Group Strategies

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The purpose of this form is to outline the general principals and risks of the Brooklyn Investment Group ("Brooklyn") trading strategies and to disclose that there are inherent differences when investing with Brooklyn as compared to most other investment options offered by Wealth Watch Advisors, Inc ("WWA"). The Advisor and Client must sign this document to acknowledge agreement and understanding of the content included in this form before trades will be approved by Wealth Watch Advisors staff.

Brooklyn uses Direct Indexing as a tool to help Clients customize their investments based on tax optimization needs, moral principles and values, and other unique circumstances that need solutions. Direct Indexing is an investing approach that is not offered within the WWA core investment models and is therefore outsourced to Brooklyn in their area of advanced expertise. Direct Indexing is not appropriate for every Client but can assist those in the right circumstances.

The following risks are not all-inclusive but should be considered carefully by a prospective or existing Client and their Advisor before investing an account with Brooklyn through WWA. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and their impact.

General Mark Risk. Client accounts will generally be subject to movements in stock, bond and other asset markets as well as idiosyncratic fluctuations in the prices of individual stocks, ETFs and other assets. Investments made through the Brooklyn platform involve substantial risk and are subject to various market, currency, economic, political and regulatory risks.

Automated Investing Risk. Brooklyn relies on an account opening form consisting of a number of questions that form a basis for how it manages portfolios. Such questionnaires are static in nature. The questions may or may not accurately capture an individual Client's needs and how they may change over time. Moreover, online and electronic interactions have limitations compared to in-person individual advice.

Theme-based Investing Risk. Theme-based investing can reflect specific preferences selected by the Client and carry specific risks. For example, investing in companies that rank highly on ESG characteristics, according to third-party data, may introduce risks that the data used to evaluate these companies is subjective or erroneous. Also, such companies may underperform the returns of other companies. There is no guarantee that companies in the portfolio will not have ESG controversies.

Benchmarking Risk. Using existing benchmarks as a reference point for investing decisions doesn't guarantee performance that is similar to that of the benchmarks. At any point in time, Brooklyn's investment decisions may lead a portfolio to underperform the market and / or its benchmark, especially depending on the preferences and customizations selected by the Client. Long / Short Strategy Risk. There are additional risks for those electing long / short strategies. These include market risk that can lead to loss due to the impact of general market movements. Additionally, long / short strategies have idiosyncratic risks due to company-specific factors that are generally not correlated with the broad market environment. Long / short strategy investors are exposed to short-sale risk that can amplify losses because the stock price appreciates. Lastly, the leverage aspect of long / short strategies can cause an unexpected interaction between longs and shorts or an improperly hedged portfolio. Embedded in this is a borrow rate risk for stocks that are thinly traded or less available for other reasons.

Short Selling Risk. Brooklyn may engage in short selling on behalf of Clients. Short selling transactions expose Clients to the risk of loss in an amount greater than the initial investment, and such losses can increase rapidly and without effective limit. There is the risk that the securities borrowed by the Clients in connection with a short sale would need to be returned to the securities lender on short notice. If such request for return of securities occurs at a time when other short sellers of the subject security are receiving similar requests, a “short squeeze” can occur, wherein the Clients might be compelled, at the most disadvantageous time, to replace the borrowed securities previously sold short with purchases on the open market, possibly at prices significantly in excess of the proceeds received earlier.

Small and Medium Company Risk. Investments in small and medium capitalization companies involve additional risks. These additional risks, among others, may result from concentrated product lines, narrower markets, limited access to financial resources, and greater vulnerability to competition. These factors often increase the volatility of their underlying share price and make it difficult to value or sell these investments. Relative to the stocks of large capitalization companies, the stocks of small- and mid capitalization companies may be thinly traded and sales may result in higher transaction costs. Small- and mid-capitalization companies may also perform poorly during times of economic stress.

International Risk. Investments in securities of companies located outside of the U.S. may involve further risks, including risks resulting from exposure to foreign currencies, political instability, and regulatory complications. These factors often increase the volatility of the underlying share price, and make it difficult to value, sell, or predict these investments. Brooklyn’s strategies do not hedge currency risk.

Fixed Income Securities and Bond ETF Risk. Fixed income ETFs offer Clients the opportunity to dampen the portfolio risk of an End Investor while earning income from interest-generating securities. They create packages of bond market exposures that are not easily and efficiently replicated by most investors. Unlike owning individual stocks, which aim for long-term growth, a bond ETF often contains many bonds, making an ETF generally less risky than owning just a handful of individual bonds.

When included in a well-balanced portfolio, bond ETFs may help limit the risks associated with investing in more volatile assets, such as stocks. All investing is subject to risk, however, including the possible loss of the money a Client invests. Investments in bond ETFs are no exception and are subject to interest rate, credit, and inflation risk.

The performance of fixed income strategies will change daily based on changes in interest rates, credit spreads, and in response to economic, political or financial market developments. Fixed income securities are sensitive to changes in interest rates depending on their maturity and involve the risk that their prices may decline if interest rates rise. Debt securities carry the additional risk of default. Changes specific to an issuer, such as its financial condition, can affect the credit quality or value of an issuer's securities. Lower-quality debt securities (those below investment grade quality, also referred to as high yield debt securities) and certain types of other securities are more speculative and involve greater risk of loss, especially in periods of general economic difficulty.

The value of mortgage securities, which comprise a large percentage of the U.S. bond market, can sometimes exhibit significant volatility, and may change due to shifts in the market's perception of issuers and changes in interest rates, regulatory or tax changes. Lastly, ETF performance may not exactly match the performance of the market that it’s designed to track because: 1) the ETF will incur expenses and transaction costs not incurred by the underlying securities; 2) certain securities tracked by the ETF may, from time to time, be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause it’s shares to trade at a premium or discount to the actual value of the securities owned by the ETF.

Concentration Risk. Brooklyn's investment themes will typically hold a number of security positions, but this will still expose the portfolio to the broader market, particular industries or styles, and to the change in the value of specific companies or cryptocurrencies. Losses in one or more positions, or a downturn in an industry, style or market sector in which the company participates will adversely affect the portfolio's performance.

Liquidity Risk. Stock market liquidity is dynamic as is the available shares for purchase and sale of an individual company at any given time. Accordingly, Clients may not always be able to sell their securities at an advantageous price, or even at all, on occasion. They may even be forced to sell their securities at a deep discount to what they expect "fair market value" to be. Model Risk. Brooklyn's models, and the judgment used to build and maintain them, may prove to be incorrect, and a Client might not achieve their investment objectives.

Our models, including those incorporating machine learning, are based on evaluation of historical data, and in certain instances forward-looking simulations. Actual events may differ markedly or even lie outside our projections.

Multi-Manager Risk. We may share investment responsibility with other managers, including managers that are investors in Brooklyn or have other commercial arrangements with Brooklyn. When allocating assets to underlying managers, the interplay of the various strategies employed by the underlying managers may result in an account holding a significant amount of certain types of securities. This may be beneficial or detrimental to an account's performance depending upon the performance of those securities and the overall economic environment.

The managers may make investment decisions that conflict with each other; for example, at any particular time, one manager may be purchasing shares of an issuer whose shares are being sold by another manager. Consequently, the account could indirectly incur transaction costs without accomplishing any net investment result. In addition, the multi-manager approach could increase an account's turnover rate which may result in higher transaction costs and higher taxes.

Tax-Managed Investing Risk. Whether the tax loss harvesting services offered by Brooklyn will provide a benefit or not is dependent upon each Client's entire tax, financial and investment circumstances (e.g., including transactions in other investment accounts outside of Brooklyn and any spouse or dependent accounts that Brooklyn does not have visibility to monitor for assessing tax loss harvesting implications). In addition, specific regulations put in place by the Internal Revenue Service ("IRS") can prevent the sale of a security at a loss and repurchase of the same or substantially identical security shortly before or after. Losses from such sales, also known as "wash sales" are not deductible in many cases. The wash sale rules are unclear in some cases, and the Internal Revenue Service may find that a transaction has resulted in a wash sale notwithstanding Brooklyn's precautions.

Clients and their Advisors are responsible for determining whether enabling tax loss harvesting services is right for each Client, when to enable or disable, including any tax consequences arising from such transactions. For further information on how these practices would apply to Clients, please consult a professional tax advisor before enabling such features.

A potential benefit of Brooklyn offering individual stock ownership through SMAs is that each Client owns shares in companies rather than holding an equity ETF or a mutual fund. Direct share ownership may facilitate tax loss harvesting.

Tax loss harvesting only applies to taxable investment accounts and has certain limitations. Retirement accounts such as IRAs and 401(k) accounts can grow tax deferred.

When enabled on the Platform by the Client, the benefit of these techniques is subject to prevailing income tax rates and IRS rules regarding characterization, including wash sale and related rules discussed above. Investment strategies that seek to enhance after-tax performance might be unable to fully realize strategic gains or harvest losses due to various factors. Market conditions could limit the ability to generate tax losses. A tax-managed strategy might cause a client portfolio to hold a security in order to achieve more favorable tax treatment or to sell a security in order to create tax losses.

Tracking Error Risk. Tracking error risk refers to the risk that the performance of a client portfolio might not match or correlate to that of the index it attempts to track, either on a daily or aggregate basis. Factors that contribute to tracking error generally include items such as fees and trading expenses, client-imposed restrictions, imperfect correlation between the index and the portfolio's investments, changes to the composition of the index, regulatory policies, high portfolio turnover and the use of leverage all contribute to tracking error. Tracking error risk might cause the performance of a client portfolio to be less or more than expected.

Hypothetical Performance and Evaluation Tools Risk. Relying on backtest results from Brooklyn's interactive analysis tool when evaluating custom indices carries certain risks. Prior to implementing their custom indices, Brooklyn Clients may be shown the historical performance, net of estimated advisory fees, of the share composite of proposed companies. These backtest results may in some instances be compared to publicly traded ETFs and broader market indices. While the composite is simply a representation of the different share prices, adjusted to their proposed weightings, this hypothetical past performance is not representative of an actual or expected performance record because the trades were not actually executed. The results displayed do not include, among other considerations, trading costs, and certain market or economic factors, such as a lack of liquidity or the impact of subscriptions and redemptions in a Brooklyn portfolio. Hypothetical past performance in general is also designed with the benefit of hindsight.

Brooklyn's Platform includes information and disclosures that allow Clients to learn what criteria and assumptions are used by the interactive analysis tool when calculating the historical performance of the custom index displayed as an additional evaluation resource, and we highlight the risks and limitations of using these backtest results in constructing the custom indices.

Legislative Risk. Client account performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to, changes in investment advisor or securities trading regulation, and changes in the tax code.

Disclosure Limitations Risk. The foregoing list of risks does not purport to be a complete enumeration or explanation of the risks involved in investing through the Brooklyn platform. As markets change and Brooklyn's investment strategies evolve, Clients may be subject to additional and different risk factors. No assurances can be made that profits will be achieved, or that substantial losses will not be incurred.

All Client accounts invested in a Brooklyn Investment Group trading strategy are required to trade these models in a separate and standalone account that is not comingled with any other model management. Wealth Watch Advisors, Inc. and their affiliates will fulfill trade requests and possible corrections to the best of their ability within the confines of the rules established by Brooklyn.

All Clients and Advisors must always consult with Brooklyn staff directly prior to investing an account should there be any questions or concerns regarding Direct Indexing or Brooklyn's investment approach. The Client and the Advisor understand that Wealth Watch Advisors, Inc. is not responsible for policing or pre-approving recommendations provided direct by Brooklyn to each Client and Advisor. WWA will receive this signed contract as a record showing all risks are understood and questions have been answered by Brooklyn prior to investing an account. Investment choices in relation to these mentioned recommendations are ultimately up to the discretion of the Client and the Advisor's shared understanding of the Client's full financial situation along with advice from Brooklyn.

After reviewing the information above and discussing it with my Investment Advisor Representative, I understand and agree that investing with Brooklyn Investment Group is fundamentality different from other investment choices available through Wealth Watch Advisors, Inc., and it has been determined that these outside investments are appropriate for my financial situation.

Client Signature(s)

I acknowledge that I have read, understand, and agree with all terms within each of the five pages of this legally binding document.

Client Printed Name *Client Signature* *Date Signed*

Client Printed Name *Client Signature* *Date Signed*

Investment Advisor Representative "IAR" Signature

I acknowledge that I have read, understand, and agree with all text within each of the five pages of this legally binding document. I hereby agree to act in accordance with all sections of this agreement, the WWA ADV 2B, and in a fiduciary capacity.

IAR Printed Name *IAR Signature* *Date Signed*

Wealth Watch Advisors, Inc. Signature

William Gastl

Chief Operating Officer, Wealth Watch Advisors, Inc. *Signature*