



Midwestern Securities Trading Company, LLC  
P.O. Box 2528, East Peoria, IL 61611  
309.699.6786 ■ Fax: 309.699.7498  
info@midwesternsecurities.com

# WRAP Fee Program: Midwestern Securities Lighthouse Portfolios™

Supplement to Part 2 A: Appendix 1 of Form ADV: Wrap Fee Program Brochure

## Midwestern Securities Trading Company, LLC

["Midwestern Securities"]  
300 E. Washington St. Ste. 3  
East Peoria, ILLINOIS 61611

### Mailing address:

300 E. Washington Street Ste. 3, P.O. Box 2528  
East Peoria, ILLINOIS 61611

[CRD# 101080]

Telephone : 309-699-6786 or 800-732-8601

Facsimile : 309-699-749

Email : [jweber@midwesternsecurities.com](mailto:jweber@midwesternsecurities.com)

Website : [www.midwesternsecurities.com](http://www.midwesternsecurities.com)

***This wrap fee program brochure provides information about the qualifications and business practices of Midwestern Securities Trading Company, LLC. If you have any questions about the contents of this brochure, please contact us at 309-699-6786 or 800-732-8601 and via email at [jweber@midwesternsecurities.com](mailto:jweber@midwesternsecurities.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.***

***Additional information about Midwestern Securities Trading Company, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).***

***Please note that the terms "registered investment advisor" or "registered" do not imply a certain level of skill or training.***

**Item 2: Material Changes:** Amendments to our wrap fee program brochure as of 03/31/2024. In this section we identify and discuss only material changes made to the wrap fee program brochure since 12/31/2023 (last review/update).

*New model portfolios added. All model portfolio names updated.*

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#### Item 4: Services, Fees, and Compensation

**A.** Midwestern Securities has created a model portfolio program called “Midwestern Securities Lighthouse Portfolios™.” It is a total return portfolio and will invest in, but not be limited to, stocks, bonds, money market, ETF, mutual funds, notes, SMAs, UITs, and REITs with active secondary markets and indexes. The Investment Advisory (IA) Committee will have the latitude to build a total return portfolio utilizing whatever avenues they think accomplish this objective. The service provided within the program is active management by the IA Committee. They have the discretion to buy and sell based on but not limited to their experience, market conditions, and independent, third-party analyst reports. These allow the managers to remove or add holdings as deemed pertinent without contact and consent with the account holder for more timely execution. The IA Committee will meet quarterly to review the portfolios and their holdings. They will make strategic decisions around current holdings, cash accumulation, and market opportunities. There may be times when securities selected for purchase by the IA Committee will not be reflected in all accounts. There are various reasons why this could occur. The IA Committee will utilize trading software with drift features and minimum purchase amounts to assist in this review and trading process. The goal is for all accounts to have the same securities but given that issues can arise limiting some accounts from purchasing securities it is disclosed in this manner, so account holders are aware. They will share this information with the Investment Advisory Representative (IAR) on each account, and the IAR will provide reviews, education, and updates from the IA Committee. The IAR will serve as the point person managing the relationship and working with the client. Other communication methods may be used as the IA Committee feels necessary to communicate changes in the portfolio or other information they deem appropriate to communicate to the account owners.

The wrap fee we charge we base on account relationships, not on a household basis. Account owners investing in the Midwestern Securities Lighthouse Portfolios™ will pay a platform fee of 30 basis points (bps) for each account, which Midwestern Securities will deduct from the advisory fees agreed to on the Midwestern Securities Investment Advisory Agreement. Accounts with over \$1,000,000 within the Midwestern Securities Lighthouse Portfolios™ will receive a reduced platform charge of 20bps. Accounts with over \$5,000,000 within the Midwestern Securities Lighthouse Portfolios™ will receive a reduced platform charge of 15bps. Accounts with over \$10,000,000 within the Midwestern Securities Lighthouse Portfolios™ will receive a reduced platform charge of 10bps. The basic or default fee schedule which is located in Midwestern Securities Investment Advisory Agreement and Midwestern Securities ADV Part2 5.A. is below. Fees are negotiable but cannot exceed the schedule below, and the Midwestern Securities Lighthouse Portfolios™ platform fee (ranging from 10bps – 30bps) is netted against the negotiated fee or default fee schedule representing the total fee not a fee in addition to 100 basis points (bps) equal 1.00%, so 10-30 bps are .10%-.30%. The remaining fee after the deduction of the platform is retained by Advisor, Investment Advisor Representative, and in the event the representative resides within a bank or credit union the institution will share in the fee based on the third-party brokerage agreement. By execution of the Agreement, the Client authorizes Advisor and National Financial Services, Inc. to debit directly and/or indirectly, the Investment Account known as or the elective Billing Account for the fees owed to the Advisor.

| <u>Account size</u>              | <u>Fee (% of assets under management)</u> |
|----------------------------------|---|
| \$0.00 to \$999,999.99           | 2.00%                                     |
| \$1,00,000.00 to \$4,999,999.99  | 1.75%                                     |
| \$5,000,000.00 to \$9,999,999.99 | 1.50%                                     |
| \$10,000,000.00 and over         | 1.25%                                     |

**B.** The Midwestern Securities Lighthouse Portfolios™ may cost more or less than purchasing such services separately. However, Midwestern Securities has reviewed this program relative to others and found it to be competitive and actually less than some third-party managers. Factors that bear upon the costs of the pro-

gram are custodian fees, trading, and execution fees, etc. are absorbed by Midwestern Securities not passed back to the client as other programs may choose to do.

**C.** In order to have a more transparent pricing structure, there won't be commissions, annual maintenance fees, or IRA custody/maintenance fees. Instead, Midwestern Securities will charge a platform fee (ranging from 10bps-30bps) for these accounts, which will be deducted from the advisory fees agreed to on the Investment Advisory Agreement as previously stated in Item 4.A. Other fees still present are listed below. Some of these fees listed may not be applicable and you should consult your investment advisory representative to discuss your specific account(s). These fees are also contained in the Midwestern Securities Welcome Letter.

#### ANNUAL FEES <sup>1</sup>

|  |       |
|--|-------|
| IRA Fee per account                                | \$0   |
| HSA Fee per account                                | \$0   |
| Account Maintenance Fee                            | \$0   |
| NFS Select Access Cash Management                  | \$10  |
| with Debit Card                                    | +\$5  |
| with Check Writing                                 | +\$5  |
| NFS Premier Access Cash Management with Debit Card | \$100 |
| Midwestern Securities Beacon                       | \$40  |
| Portfolio Annual Fee                               |       |

#### OTHER FEES <sup>1</sup>

|   |       |
|---|-------|
| IRA Closing Fee                             | \$125 |
| HSA Closing Fee                             | \$25  |
| Transfer of Assets Delivery Fee             | \$75  |
| Legal Transfer                              | \$100 |
| Transfer and Ship DRS Registration          | \$65  |
| Transfer and Ship Non-DRS Registration      | \$500 |
| Mailgram                                    | \$10  |
| Physical Reorganizations                    | \$150 |
| Write-off of Non-Marketable Security        | \$35  |
| Safekeeping of Physical Certificate         | \$25  |
| Legal Returns                               | \$100 |
| Bounced Check Fee                           | \$30  |
| Stop Payments                               | \$20  |
| Securities Account Control Agreement Set-up | \$500 |
| NFS Wires (incoming) <sup>2</sup>           | \$0   |
| NFS Wires (outgoing) <sup>2</sup>           | \$15  |
| Overnight Check Delivery                    | \$35  |
| Printing & Postage Confirmation             | \$0   |

<sup>1</sup> The fees and expenses are subject to change without prior notification. Fee schedule update effective 03/30/2023.

<sup>2</sup> Your financial institution may charge to send or receive wires. Please consult your financial institution's rate schedule for applicable wire fees.

**D.** The IAR recommending the Midwestern Securities Lighthouse Portfolios™ does not receive any additional compensation for doing so and actually may receive less than other arrangements as the program fee (**ranging from 10bps-30bps**) is netted against the total fee agreed to on the Midwestern Securities Investment Advisory Agreement.

**E.** The Midwestern Securities Beacon Portfolios do have a minimum annual fee of \$40. The fee will be billed in \$10 increments quarterly coinciding with the advisory fee charge.

#### Item 5: Account Requirements and Types of Clients

**A.** The account minimum is \$25,000.00 for qualified and non-qualified accounts in the Midwestern Securities Lighthouse Portfolios™ with the exception of the following:

1. The account minimum is \$50,000.00 for the Midwestern Securities Lighthouse Portfolios™ 50/50 Base/Fixed Income Taxable, the Midwestern Securities Lighthouse Portfolios™ 50/50 Base/Fixed Income Tax-Advantaged, the Midwestern Securities Lighthouse Portfolios™ 50/50 Base/Diversified Growth, the Midwestern Securities Lighthouse Portfolios™ Blend 50/50 Base/Fixed Income Taxable, the Midwestern Securities Lighthouse Portfolios™ Blend 50/50 Base/Fixed Income Tax-Advantaged, and the Midwestern Securities Lighthouse Portfolios™ 80/20 Base/Diversified Growth for both qualified and non-qualified accounts.

2. The Midwestern Securities Beacon Portfolios do not have a minimum account size.

**B.** Individuals and Entities can choose to invest their assets within the Midwestern Securities Lighthouse Portfolios™.

#### **Item 6: Portfolio Manager Selection and Evaluation**

**A.** Midwestern Securities has hired its own internal managers for this program. John Graham, Michael Graham, Nathan White, Tate Hartman, Josh Miller, and Scott Fisher are the managers who make up the IA Committee. These are the six managers who make up the IA Committee. All are unit holders of Midwestern Securities who hold advanced designations. The Investment Policy Statement (IPS) is below starting on page 7 which outlines criteria for changes within the portfolio. The managers are responsible for buying and selling positions within the portfolios. It is the responsibility of the investment advisory representative to determine if changing to another portfolio and management team is advantageous to the client and making such recommendations to his/her client.

1. Midwestern Securities employs one securities principal to oversee the IA Committee and their trades. This individual is Cassie Taraboletti, Chief Operations Officer. The managers will use historical information by independent third-party providers and analysts to assist in their review. In addition, they will use indexes for benchmarks. The standards will truly be set by the managers and their experience as to what changes are needed.
2. Midwestern Securities will review performance information of the portfolios through but not limited to Morningstar and the funds prospectuses. The review performed by the managers will be reviewed by Jeff Weber as the securities principal supervising the IA Committee before released to the investment advisory representatives and their clients.
3. Midwestern Securities will not hire a third party to review the Morningstar and prospectus performance information.

**B.** Six associated persons act as the portfolio managers. John Graham, Michael Graham, Nathan White, Tate Hartman, Josh Miller, and Scott Fisher act as the portfolio managers. Midwestern Securities titles this team the IA Committee as previously noted in Item 4, page 3. Non-voting members that are temporarily assigned to the IA Committee will only be so assigned in the event that they have relevant experience, knowledge, and licensing to make investment decisions in the best interest of investors. Such individuals will be associated persons of the firm and will be compensated for this temporary role.

The IA Committee is required to make investment decisions that they reasonably believe are in the best interests of investors assigned to each respective portfolio as determined based upon the stated investment objectives and profile of the portfolio. The conflict of interest is when a committee member recommends the Midwestern Securities Lighthouse Portfolios™ as they are receiving compensation twice unlike other investment advisory representatives recommending these portfolios. The IA Committee will receive quarterly compensation in the form of a flat fee, the fee is not based on any investments or performance, plus their portion of the investment advisory fee. Midwestern Securities agrees that a conflict of interest is present with respect to the advisory fee, but the additional quarterly compensation does not reflect a conflict. The conflict present due to the advisory fee is mitigated by disclosure in this document and the fact that any recommendations made by these individuals is based exclusively upon the best interest of the clients in the respective platform as identified by the stated investment profile and objectives of the platform(s). There is no additional cost to the client associated with the quarterly compensation addressed above.

**C. Name of Wrap Fee Program: Midwestern Securities Lighthouse Portfolios™**

As of 10/01/2021, the Midwestern Securities Beacon Portfolios were added as part of Midwestern Securities' Lighthouse Portfolios

Name of Sponsor: Midwestern Securities Trading Company, LLC (Midwestern Securities)

**Item 7: Client Information Provided to Portfolio Managers**

IARs should communicate to the portfolio managers on an as needed basis. However, at minimum, they should keep quarterly records of account reviews, any conversations had with the client during the quarter, and any other details pertinent to the client's financial situation. As needed the IARs should share these with the portfolio manager. This flow of information is internal. IARs communicate directly with the portfolio managers not through a third party.

**Item 8: Client Contact with Portfolio Managers**

There are no restrictions placed on account owners from contacting the portfolio managers. It is preferred that communication with the client be with their IAR and allow he/she to communicate with the portfolio managers.

**Item 9: Additional Information**

**A. 1. Disciplinary Information (Item 9 in the ADV, Part 2A)**

**2. Other Financial Industry Activities and Affiliations (Item 10 in the ADV, Part 2A)**

***Midwestern Securities has no disclosures to make under this section regarding legal, regulatory, or disciplinary events.***

***Midwestern Securities is an introducing, fully disclosed broker/dealer so IARs do engage in securities business. Midwestern Securities is an insurance agency so IARs do engage in insurance business as well.***

**B. (Item 11 in the ADV, Part 2A)**

**1. Code of Ethics**

**2. Participation or Interest in Client Transactions**

**3. Personal Trading.**

***Our firm's Code of Ethics describes our policies and procedures to abide by the law's prohibition against insider trading, including our reviews of our own persons' trades, and other ethical considerations. We will provide you, our client or potential client, a copy of our Code of Ethics if you write to us requesting one.***

***We do not participate in Client Transactions.***

***As noted above, we do allow advisory affiliates from time to time to buy or sell, in their own accounts, securities that are recommended to clients. When applicable, we will inform the client of the personal position or contemplated transaction prior to effecting a transaction on the client's behalf. The client's transactions are always completed before the advisory affiliate enters orders for their own account. We may bunch orders to obtain equally advantageous, better priced trade executions. We address the potential conflict of interest by disclosing it as well as by placing clients' trades first.***

**4. (Item 13 in the ADV, Part 2A): Review of Accounts**

***All investment advisors are responsible for reviewing their accounts. It is a best practice for advisory representatives to review advisory accounts at least quarterly and file those records in their***



*respective offices. A Midwestern Securities officer will audit their file once a year during their annual branch office audit. Midwestern Securities urges its clients to compare all statements they receive regarding their accounts for accuracy and agreement.*

*The IA Committee will review accounts quarterly. If needed between quarterly reviews, due to but not limited to market conditions, client' personal or financial situations or due to clients' personal goals.*

**5. (Item 14 in the ADV, Part 2A): Client Referrals and Other Compensation**

*Midwestern Securities does not have a formal referral program in place regarding the Midwestern Securities Lighthouse Portfolio Program.*

*The Midwestern Securities Lighthouse Portfolios™ Program has no other compensation or conflicts of interest as the commission schedule has been set to zero. 12B-1 fees are not present since all share classes must be advisory or institutional and all individual position purchases carry no commissions.*

**6. (Item 18 in the ADV, Part 2A): Financial Information**

*If our firm has discretionary authority over your assets [see Item 16], then we must disclose if there is any financial condition reasonably likely to impair our firm's ability to meet its contractual commitments to its clients. Midwestern Securities does not have any financial condition that could reasonably seem likely to impair our ability to meet our contractual commitments to you, our client. Our firm has not been the subject of a bankruptcy petition during the last 10 years.*

## **Investment Policy Statement (IPS)**

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All investors will receive the IPS and attest as shown below.

### **Investment Philosophy**

The basic tenets under which Midwestern Securities Lighthouse Portfolios™ will be managed include the following:

- 1.** Modern portfolio theory, as recognized by the 1990 Nobel Prize, will be a philosophical foundation for how the portfolio will be structured and how subsequent decisions will be made. The underlying concepts of modern portfolio theory include:
  - Investors are risk averse. The only acceptable risk is that which is adequately compensated by potential portfolio returns.
  - Markets are efficient. It is virtually impossible to anticipate the future direction of the market as a whole or of any individual security. It is, therefore, unlikely that any portfolio will succeed in consistently "beating the market."
  - The design of the portfolio as a whole is more important than the selection of any particular security within the portfolio. The appropriate allocation of capital among asset classes (stocks, bonds, cash, etc.) will have far more influence on long-term portfolio results than the selection of individual securities. Investing for the long term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
  - For a given risk level, an optimal combination of asset classes will maximize returns. Diversification helps reduce investment volatility. The proportional mix of asset classes determines the long-term risk

and return characteristics of the portfolio as a whole.

- Portfolio risk can be decreased by increasing diversification of the portfolio and by lowering the correlation of market behavior among the asset classes selected. (Correlation is the statistical term for the extent to which two asset classes move in tandem or position to one another.)

2. Investing globally helps minimize overall portfolio risk due to the imperfect correlation between economies of the world. Investing globally has also been shown historically to enhance portfolio returns, although there is no guarantee that it will do so in the future.
3. Stocks that pay dividends are more likely to be a part of the Midwestern Securities Lighthouse Portfolios™. This may also include investments that do not pay dividends, but that will not be the focus.
4. Investing in a mix of asset classes that includes cash, bonds, large-cap domestic, large-cap international, mid-cap, small-cap, and natural resources will likely be standard across all our portfolios. Variations will be made in the percentage invested in cash and bonds depending on an investor's individual liquidity needs. An investor's desire for tax-advantaged status will also be considered.
5. Cash created by dividends distributions into the account will not be automatically reinvested. Instead, the IA committee will decide which stocks to invest the money in.

Given these tenets, the underlying approach to managing the Midwestern Securities Lighthouse Portfolios™ shall be total return. The Midwestern Securities Lighthouse Portfolios™ will be diversified globally, employing a variety of asset classes.

### **Time Horizon**

For the purposes of planning, the time horizon for the investments in The Midwestern Securities Lighthouse Portfolios™ will parallel the combined lifetime of the investor. It is assumed that the investment horizon for the portfolios exceeds five (5) years.

Capital values do fluctuate over shorter periods and the Investor recognizes that the possibility of capital loss does exist. However, historical asset class return data suggest that the risk of principal loss over a holding period of at least five years can be minimized with the long-term investment mix employed under this Investment Policy Statement.

### **Investment Profile**

The Midwestern Securities Lighthouse Portfolios™ investment priorities are primarily capital appreciation and income.

### **Frequency of Review**

The investor recognizes that all investments go through cycles and, therefore, there will be periods of time in which the investment objectives are not met or when specific managers fail to meet their expected performance expectations.

The Investor accepts the principle that, in the absence of specific circumstances requiring immediate action, patience and a longer-term perspective will be employed when evaluating investment performance.



## Permitted Asset Classes

1. Cash and cash equivalents
2. Fixed income- domestic bonds (including investment grade, high yield, and municipal bonds)
3. Fixed income- non-U.S. bonds
4. Equities- U.S.
5. Equities- non-U.S.
6. Equities- emerging markets
7. Equities- REITs
8. Alternative investments

## Selection/retention criteria for investments

### Investment Management Selection

Investment managers (including mutual funds, money managers and limited Partnership sponsors) shall be chosen using the following criteria:

- Past performance considered relative to other investments having the same investment objective. Consideration shall be given to both performance rankings over various time frames and consistency of performance.
- Payment of a dividend to investors.
- Costs relative to other funds with like objectives and investment styles.
- The manager's adherence to investment style and size objectives.
- Size of the proposed mutual fund.
- Length of time the fund has been in existence and length of time it has been under the direction of the current manager(s) and whether or not there have been material changes in the manager's organization and personnel.
- The historical volatility and downside risk of each proposed investment.
- How well each proposed investment complements other assets in the portfolio.
- The current economic environment.

## Investment Monitoring and Control Procedures

### Monitoring process

The Investment Advisory Committee will monitor the investments periodically and make changes as needed in line with the investment policy spelled out above.

## Reports

The investment custodian shall provide the Investor with at least quarterly statements of each account that list all assets held by the Investor, values for each asset and all transactions affecting assets within the portfolio, including additions and withdrawals.

### **Meeting and Communication between Investor and Advisor**

As a matter of course, Investment Advisory Committee shall keep Investor apprised of any material changes in the Investment Advisory Committee's outlook, recommended investment policy, and tactics. However, these portfolios are for discretionary accounts, therefore the Investment Advisory Committee will not be required to consult Investor every time a suitable trade is placed within the portfolio.

Any material event that affects the ownership of Investment Advisory Committee's firm or the management of the Portfolio must be reported to Investor.

### **Duties and Responsibilities**

Investment Advisory Committee shall be responsible for:

- 1.** Designing, recommending, and implementing an appropriate asset allocation plan consistent with the investment objectives, time horizon, risk profile, guidelines and constraints outlined in this statement
- 2.** Recommending an appropriate custodian to safeguard Investor's assets
- 3.** Advising the Investor about the selection of and the allocation of asset categories
- 4.** Identifying specific assets and investment managers within each asset category
- 5.** Ensuring that the custodian provides Investor with a current prospectus, where applicable, for each investment proposed for the portfolio
- 6.** Monitoring the performance of all selected assets
- 7.** Periodically reviewing the suitability of the investments for the Investor
- 8.** Preparing and presenting appropriate reports

### **The Investor**

Investor shall be responsible for:

- The oversight of the Portfolio
- Investor shall provide Investment Advisory Representative with the relevant information on Investor's financial conditions and risk tolerance and shall notify Investment Advisory Representative promptly of any changes to this information
- Investor shall read and understand the information contained in the prospectus and each investment in the Portfolio.
- Investor shall read the ADV and IA agreement and statements, confirmations, etc.