

**FORM ADV PART 2A
DISCLOSURE BROCHURE**

Great Life Investing LLC

Office Address:
4424 6th Ave.
Tacoma, WA 98406

Mailing Address:
PO Box 6823
Tacoma, WA 98417

Tel: 253-858-2427

Crystal@greatlifeinvesting.com

Website:
www.greatlifeinvesting.com

This brochure provides information about the qualifications and business practices of Great Life Investing LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 253-858-2427. 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 Great Life Investing LLC (CRD #310681) is available on the SEC's website at www.adviserinfo.sec.gov

JANUARY 19, 2023

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This update is in accordance with the required annual update for Investment Advisors. Since the last filing of this brochure on June 1, 2022, the following updates have been made:

- Item 4 has been updated to reflect a more recent asset under management calculation.
 - Cover pages have been updated to reflect new office and mailing addresses.
 - Items 4 and 5 have been updated to disclose a new service offering and the corresponding fee schedule.
 - Item 5 has been updated to clarify billing for deposits and withdrawals.
 - The supplemental brochure has been updated to include a new designation.
-

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

Item 3: Table of Contents

Form ADV – Part 2A – Firm Brochure

Item 1: Cover Page

Item 2: Material Changes ii

Annual Update ii

Material Changes since the Last Update..... ii

Full Brochure Available..... ii

Item 3: Table of Contents..... iii

Item 4: Advisory Business 1

Firm Description 1

Types of Advisory Services 1

Client Tailored Services and Client Imposed Restrictions..... 2

Wrap Fee Programs 2

Client Assets under Management 2

Item 5: Fees and Compensation 2

Method of Compensation and Fee Schedule..... 2

Client Payment of Fees 4

Additional Client Fees Charged..... 4

Prepayment of Client Fees 5

External Compensation for the Sale of Securities to Clients..... 5

Item 6: Performance-Based Fees and Side-by-Side Management..... 5

Sharing of Capital Gains 5

Item 7: Types of Clients 5

Description 5

Account Minimums 5

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss 5

Methods of Analysis..... 5

Investment Strategy 6

Security Specific Material Risks..... 6

Item 9: Disciplinary Information..... 9

Criminal or Civil Actions 9

Administrative Enforcement Proceedings 9

| | |
|--|-----------|
| Self- Regulatory Organization Enforcement Proceedings | 9 |
| Item 10: Other Financial Industry Activities and Affiliations | 9 |
| Broker-Dealer or Representative Registration | 9 |
| Futures or Commodity Registration | 9 |
| Material Relationships Maintained by this Advisory Business and Conflicts of Interest | 10 |
| Recommendations or Selections of Other Investment Advisors and Conflicts of Interest | 10 |
| Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading | 10 |
| Code of Ethics Description | 10 |
| Investment Recommendations Involving a Material Financial Interest and Conflict of Interest | 11 |
| Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest | 11 |
| Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest | 11 |
| Item 12: Brokerage Practices | 11 |
| Factors Used to Select Broker-Dealers for Client Transactions | 11 |
| Aggregating Securities Transactions for Client Accounts | 13 |
| Item 13: Review of Accounts | 13 |
| Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved | 13 |
| Review of Client Accounts on Non-Periodic Basis | 13 |
| Content of Client Provided Reports and Frequency | 13 |
| Item 14: Client Referrals and Other Compensation | 14 |
| Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest | 14 |
| Advisory Firm Payments for Client Referrals | 14 |
| Item 15: Custody | 14 |
| Account Statements | 14 |
| Item 16: Investment Discretion | 15 |
| Discretionary Authority for Trading | 15 |
| Item 17: Voting Client Securities | 15 |
| Proxy Votes | 15 |
| Item 18: Financial Information | 15 |
| Balance Sheet | 15 |

| | |
|--|-----------|
| Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients..... | 15 |
| Bankruptcy Petitions during the Past Ten Years..... | 15 |
| Item 19: Requirements for State Registered Advisors | 15 |
| Principal Executive Officers and Management Persons | 15 |
| Outside Business Activities..... | 16 |
| Performance Based Fee Description..... | 16 |
| Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons..... | 16 |
| Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities..... | 16 |
| Brochure Supplement (Part 2B of Form ADV) | 18 |
| Principal Executive Officer – Crystal McMahon..... | 18 |
| Item 2 - Educational Background and Business Experience | 18 |
| Item 3 - Disciplinary Information | 19 |
| Item 4 - Other Business Activities..... | 20 |
| Item 5 - Additional Compensation..... | 21 |
| Item 6 - Supervision | 21 |
| Item 7 - Requirements for State-Registered Advisors | 21 |

Item 4: Advisory Business

Firm Description

Great Life Investing LLC dba Great Life Investing (“Great Life Investing”) was founded became registered to offer investment advisory services in 2020. Crystal McMahon is 100% owner.

Types of Advisory Services

ASSET MANAGEMENT

Great Life Investing offers discretionary asset management services to advisory Clients. Great Life Investing will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Great Life Investing will gather this required Client information in the Client Profile form, which will be maintained in the Client file. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Great Life Investing discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. Great Life Investing will mainly invest in common and preferred stocks, bonds, mutual fund shares, UITs, exchange traded funds, and fixed income investments.

ASSETS HELD AWAY

Great Life Investing will work with individuals on determining their individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, and asset allocation are based on the above factors. The accounts will be monitored on a monthly basis. Great Life Investing offers management of these accounts on a discretionary basis.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, a comprehensive evaluation of an investor's current and future financial state will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. Great Life Investing will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans. Great Life Investing will gather the required Client suitability information in the Client Profile form, which will be maintained in the Client file.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Financial goals:** Based on an individual's or a family's clearly defined financial goals, including funding a college education for the children, buying a larger home, starting a business, retiring on time or leaving a legacy. Financial goals should be quantified and set to milestones for tracking.
- **Personal net worth statement:** A snapshot of assets and liabilities serves as a benchmark for measuring progress towards financial goals.
- **Cash flow analysis:** An income and spending plan determines how much can be set aside for debt repayment, savings and investing each month.
- **Retirement strategy:** A strategy for achieving retirement independent of other financial priorities. Including a strategy for accumulating the required retirement capital and its planned lifetime distribution.
- **Comprehensive risk management plan:** Identify all risk exposures and provide the necessary coverage to protect the family and its assets against financial loss. The risk

management plan includes a full review of life and disability insurance, personal liability coverage, property and casualty coverage, and catastrophic coverage.

- **Long-term investment plan:** Include a customized asset allocation strategy based on specific investment objectives and a risk profile. This investment plan sets guidelines for selecting, buying and selling investments and establishing benchmarks for performance review.
- **Tax reduction strategy:** Identify ways to minimize taxes on personal income to the extent permissible by the tax code. The strategy should include identification of tax-favored investment vehicles that can reduce taxation of investment income.
- **Estate preservation:** Help update accounts, review beneficiaries for retirement accounts and life insurance, provide a second look at your current estate planning documents, and prompt you to update your plan when the legal environment changes or you have major life events such as a marriage, death, or births.

If a conflict of interest exists between the interests of Great Life Investing and the interests of the Client, the Client is under no obligation to act upon Great Life Investing's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through Great Life Investing. Financial plans will be completed and delivered inside of sixty (60) days contingent upon timely delivery of all required documentation.

SEMINARS AND WORKSHOPS

Great Life Investing holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

Great Life Investing does not sponsor any wrap fee programs.

Client Assets under Management

As of December 31, 2022, Great Life Investing had \$12,000,000 in discretionary Client assets under management. Great Life Investing does not manage Client assets on a non-discretionary basis.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

Great Life Investing offers discretionary direct asset management services to advisory Clients. Great Life Investing charges an annual investment advisory fee based on the total assets under management as follows:

| Assets Under Management | Annual Fee | Quarterly Fee |
|----------------------------|------------|---------------|
| \$250,000 to \$500,000 | 1.25% | .313% |
| \$500,001 to \$1,000,000 | 1.00% | .250% |
| \$1,000,001 to \$2,500,000 | 0.90% | .225% |
| Over \$2,500,000 | 0.75% | .188% |

This is a tiered or breakpoint fee schedule, the entire portfolio is charged the same asset management fee. For example, a Client with \$750,000 under management would pay \$7,500 on an annual basis. $\$750,000 \times 1.00\% = \$7,500$.

The annual fee is negotiable based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with Clients, etc.). Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of the previous quarter. If a client deposits \$20,000 or greater or withdraws \$20,000 or greater, during the current quarter, those cash flow amounts will be billed on a prorated basis and included in the following quarter's Advance billing. Any cash flow amounts below that threshold are not prorate billed.

Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Great Life Investing with thirty (30) days written notice to Client and by the Client at any time with written notice, email or phone call to Great Life Investing. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Great Life Investing. Additionally, all unearned fees will be refunded to the Client. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs. Alternative Investments are not managed assets and are not included in Great Life Investing's management fee calculation.

ASSETS HELD AWAY

Fees for these services will be based on a percentage of Assets Under Management as follows:

| Assets Under Management | Annual Fee | Quarterly Fee |
|----------------------------|------------|---------------|
| \$250,000 to \$500,000 | 1.25% | .313% |
| \$500,001 to \$1,000,000 | 1.00% | .250% |
| \$1,000,001 to \$2,500,000 | 0.90% | .225% |
| Over \$2,500,000 | 0.75% | .188% |

Fees will be billed directly to the Client in advance every quarter. The invoice for services is payable within ten (10) days of receipt. Clients may choose to pay Great Life Investing directly via credit card or debit card. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Great Life Investing.

FINANCIAL PLANNING AND CONSULTING

Great Life Investing charges a fixed fee for financial planning. The financial planning fee is negotiable. Prior to the planning process the Client will be provided an estimated plan fee.

Services are completed and delivered inside of sixty (60) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Great Life Investing with thirty (30) days written notice to Client and by the Client at any time with written notice, email or phone call to Great Life Investing. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client based on time spent at a rate of \$150 per hour, or any unpaid earned fees will be due to Great Life Investing. If Client cancels before the financial plan is completed, the Client will receive all completed portions of the plan along with the prorated refund/invoice. Great Life Investing reserves the right to waive the fee should the Client implement the plan through Great Life Investing.

FIXED FEES

Financial planning services are offered based on a flat fee between \$1,250 and \$10,000. This flat/fixed fee is based upon the hourly rate of \$150 times the estimated hours to complete the plan.

Fees for financial plans are billed 50% in advance with the balance due upon plan delivery. Fees will be billed directly to the Client. The Client will select the billing option, either check or credit card, in the Financial Planning Agreement.

SEMINARS AND WORKSHOPS

Great Life Investing holds seminars and workshops to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given.

Great Life Investing offers these seminars for a fee of \$15-\$25 per person to cover the costs of the meal provided. For seminars where a meal is not provided there is not cost for attendance. Fees will be collected online at the time the attendee confirms their reservation. If attendee is unable to attend, the attendee will receive a refund within two business days of the cancellation request.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing or they may pay Great Life Investing directly by check, credit card or debit card. The Client must consent in advance in writing to direct debiting of their investment account.

Fees for financial plans will be billed to the Client and paid directly to Great Life Investing.

Pursuant to WAC 460-24A-106 and WAC 460-24A-135, Great Life Investing will send the Client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based and the name of the custodian managing the assets. Great Life Investing will send these to the Client concurrent with the request for payment or payment of the adviser's advisory fees. We urge the Client to compare this information with the fees listed in the account statement.

Additional Client Fees Charged

Custodians may charge brokerage commissions, transaction fees, and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds.

Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Great Life Investing does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Great Life Investing. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Great Life Investing does not require any prepayment of fees of more than \$500 per Client and six months or more in advance.

Fees for financial plans may be billed 50% in advance with the balance due upon plan delivery

Investment management fees and assets held away fees are billed quarterly in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Great Life Investing.

External Compensation for the Sale of Securities to Clients

Great Life Investing does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Great Life Investing.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Great Life Investing does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Great Life Investing to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

Great Life Investing generally provides investment advice to individuals and high net worth individuals. Client relationships vary in scope and length of service.

Account Minimums

Great Life Investing requires a minimum of \$250,000 to open an account. In certain instances, the minimum account size may be lowered or waived.

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

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in

stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

In developing a financial plan for a Client, Great Life Investing's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Great Life Investing. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Great Life Investing:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.

- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.
- *Mutual Fund risk:* Investing in a mutual fund may cause you to bear additional expenses based on your pro rata share of the mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning a mutual fund generally reflects the risks of owning the underlying securities the mutual fund holds. You may also incur brokerage costs when purchasing mutual funds.
- *Exchange Traded Fund (ETF) risk:* Investing in an ETF may cause you to bear additional expenses based on your pro rata share of the ETF's operating expenses, including the potential duplication of management fees. The risk of owning an ETF generally reflects the risks of owning the underlying securities the ETF holds. Other risks may include the ETF not tracking the index as designed and potential liquidity and shutdown risks.
- *Stocks:* Stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or

recessionary economic environment could have an adverse effect on the price of all stocks.

- *Bonds:* Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.
- *Unit Investment Trusts:* A Unit Investment Trust (UIT) is an investment company that offers a fixed portfolio, generally of stocks and bonds, as redeemable units to investors for a specific period of time. It is designed to provide capital appreciation and/or dividend income. UITs, along with mutual funds and closed-end funds, are defined as investment companies. Please see Investment Companies Risk above for additional information.

Item 9: Disciplinary Information

Criminal or Civil Actions

Great Life Investing and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Great Life Investing and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Great Life Investing and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of Great Life Investing or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Great Life Investing is not registered as a broker-dealer and no affiliated representatives of Great Life Investing are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Great Life Investing nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Managing Member Crystal McMahon has a financial affiliated business as Chief Financial Officer with David Noble Insurance dba Great Life Planning. Approximately 2 % of her time is spent on this activity.

In addition, Ms. McMahon is an Enrolled Agent for Great Life Investing, LLC. Approximately 5% of her time is spent in this activity. She may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products and services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another Enrolled Agent of their choosing. Additionally, as an investment adviser registered under the Securities Act of Washington and other applicable federal and state securities laws, Great Life Investing owes the client a fiduciary duty to put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Great Life Investing does not select or recommend other investment advisors.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of Great Life Investing have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Great Life Investing affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Great Life Investing. The Code reflects Great Life Investing and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Great Life Investing's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Great Life Investing may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Great Life Investing's Code is based on the guiding principle that the interests of the Client are our top priority. Great Life Investing's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to “access” persons. “Access” persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Great Life Investing will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Great Life Investing and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Great Life Investing and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Great Life Investing with copies of their brokerage statements.

The Chief Compliance Officer of Great Life Investing is Crystal McMahon. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Great Life Investing does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Great Life Investing with copies of their brokerage statements.

The Chief Compliance Officer of Great Life Investing is Crystal McMahon. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Great Life Investing will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved,

the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Great Life Investing will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Great Life Investing relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Great Life Investing. Great Life Investing does not receive any portion of the trading fees.

Great Life Investing will recommend the use of Charles Schwab & Co., Inc. and TD Ameritrade.

- *Directed Brokerage*

In circumstances where a Client directs Great Life Investing to use a certain broker-dealer, Great Life Investing still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: Great Life Investing's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals. The firm may be unable to achieve most favorable execution of client transactions, and this practice may cost clients more money.

- *Brokerage for Client Referrals*

Great Life Investing does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

- *Best Execution*

Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to affect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Great Life Investing does not receive any portion of the trading fees.

- *Soft Dollar Arrangements*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by Great Life Investing from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Great Life Investing receives economic benefits as a result of commissions generated from securities transactions by the broker-dealer from the accounts of Great Life Investing. These benefits include both proprietary research from the broker and other research written by third parties.

A conflict of interest exists when Great Life Investing receives soft dollars. This conflict is mitigated by the fact that Great Life Investing has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

Great Life Investing utilizes the services of custodial broker dealers. Economic benefits are received by Great Life Investing which would not be received if Great Life Investing did not give investment advice to Clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Great Life Investing's accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

Aggregating Securities Transactions for Client Accounts

Great Life Investing is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Great Life Investing. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-late trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by the Chief Compliance Officer of Great Life Investing. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, Great Life Investing suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by Great Life Investing's custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs. Performance reports will be provided by Great Life Investing at least quarterly to Clients with assets under management, exclusive of Assets Held Away.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Great Life Investing receives additional economic benefits from external sources as described above in Item 12.

Advisory Firm Payments for Client Referrals

Great Life Investing has entered into agreements with individuals and organizations, which may be affiliated or unaffiliated with Great Life Investing, that refer Clients to Great Life Investing in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a Client is introduced to Great Life Investing by a solicitor, Great Life Investing may pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be based upon Great Life Investing's engagement of new Clients and is calculated using a varying percentage of the fees paid to Great Life Investing by such Clients. Any such fee shall be paid solely from Great Life Investing's net profits and shall not result in any additional charge to the Client.

Each prospective Client who is referred to Great Life Investing under such an arrangement will receive a copy of this brochure and a separate written disclosure document disclosing the nature of the relationship between the solicitor and Great Life Investing and the amount of compensation that will be paid by Great Life Investing to the solicitor. The solicitor is required to obtain the Client's signature acknowledging receipt of Great Life Investing's disclosure brochure and the solicitor's written disclosure statement.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by Great Life Investing.

Great Life Investing is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Great Life Investing.

If Great Life Investing is authorized or permitted to deduct fees directly from the account by the custodian:

- Great Life Investing will provide the Client with an invoice concurrent to instructing the custodian to deduct the fee stating the amount of the fee, the formula used to calculate the fee, the amount of assets under management the fee is based on, the time period covered by the fee, the fee calculation itself, and the name of the custodian;
- Great Life Investing will obtain written authorization signed by the Client allowing the fees to be deducted; and
- The Client will receive quarterly statements directly from the custodian which disclose the fees deducted.

Item 16: Investment Discretion

Discretionary Authority for Trading

Great Life Investing requires discretionary authority to manage securities accounts on behalf of Clients. Great Life Investing has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

Great Life Investing allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Great Life Investing in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Great Life Investing does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

Great Life Investing does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Great Life Investing will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because Great Life Investing does not serve as a custodian for Client funds or securities and Great Life Investing does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Great Life Investing has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Great Life Investing has not had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Principal Executive Officers and Management Persons

The education and business background for all management and supervised persons can be found in the Part 2B of this Brochure.

Outside Business Activities

The outside business activities for all management and supervised persons can be found in the Part 2B of this Brochure.

Performance Based Fee Description

Neither Great Life Investing nor its management receive performance based fees. Please see Item 6 of the ADV 2A for more information.

Disclosure of Material Facts Related to Arbitration or Disciplinary Actions Involving Management Persons

Neither Great Life Investing nor its management have been involved in any of the following:

1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 1. An investment or an investment-related business or activity;
 2. Fraud, false statement(s) or omissions;
 3. Theft, embezzlement or other wrongful taking of property;
 4. Bribery, forgery, counterfeiting, or extortion;
 5. Dishonest, unfair or unethical practices.
2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 1. An investment or an investment-related business or activity;
 2. Fraud, false statement(s) or omissions;
 3. Theft, embezzlement or other wrongful taking of property;
 4. Bribery, forgery, counterfeiting, or extortion;
 5. Dishonest, unfair or unethical practices.

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships with issuers of securities to disclose.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Crystal McMahon

Great Life Investing LLC

Office Address:
4424 6th Ave.
Tacoma, WA 98406

Mailing Address:
PO Box 6823
Tacoma, WA 98417

Tel: 253-858-2427

Crystal@greatlifeinvesting.com

Website:
www.greatlifeinvesting.com

This brochure supplement provides information about Crystal McMahon and supplements the Great Life Investing LLC brochure. You should have received a copy of that brochure. Please contact Crystal McMahon if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Crystal McMahon (CRD #1191470) is available on the SEC's website at www.adviserinfo.sec.gov.

JANUARY 19, 2023

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Crystal McMahon

- Year of birth: 1963
-

Item 2 - Educational Background and Business Experience

Professional Certifications:

Crystal McMahon has earned certifications and credentials that are required to be explained in further detail.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial

planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Enrolled Agent (EA): Enrolled Agents are enrolled by the Internal Revenue Service and authorized to use the EA designation. EA enrollment requirements:

- Successful completion of the three-part IRS Special Enrollment Examination (SEE), or completion of five years of employment by the IRS in a position which regularly interpreted and applied the tax code and its regulations.

Successfully pass the background check conducted by the IRS.

Educational Background:

- Colorado State University; Bachelor of Science – Business (Organizational Leadership); 2012
- Bellevue College; Associates of Science - Business; 2009

Business Experience:

- Great Life Investing LLC; Tax Preparer/Enrolled Agent; 03/2022-Present
- Great Life Investing LLC; Investment Advisor Representative/Chief Compliance Officer; 10/2020-Present
- Great Life Investing LLC; Managing Member/CEO; 08/2020-Present
- David Noble Insurance dba Great Life Planning; CFO; 03/2014-Present
- Great Life Realty LLC; Designated Broker/Owner; 04/2018-11/2022
- David Noble Insurance dba Great Life Planning; Insurance Broker; 03/2014-03/2022
- KMS Financial Services, Inc; Registered Representative; 07/2020-10/2020
- KMS Financial Services, Inc.; Investment Advisor Representative; 02/2017-10/2020
- City Closers/Coldwell Banker Commercial; Commercial Real Estate Broker; 01/2011-03/2018

Item 3 - Disciplinary Information

- A. Ms. McMahon has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which she:
1. Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. Was found to have been involved in a violation of an investment-related statute or regulation; or

4. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, her from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Ms. McMahon never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which she:
1. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 2. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
(a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending her association with an investment-related business; (c) otherwise significantly limiting her investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on her.
- C. Ms. McMahon has never been the subject of a self-regulatory organization (SRO) proceeding in which she:
1. Was found to have caused an investment-related business to lose its authorization to do business; or
 2. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Ms. McMahon has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Crystal McMahon has a financial affiliated business as CFO of David Noble Insurance dba Great Life Planning. Approximately 2% % of her time is spent on this activity. In addition, She will offer Clients services from these activities. As a CFO and real estate designated broker, she may receive separate yet typical compensation.

In addition, Ms. McMahon is a Enrolled Agent for Great Life Investing, LLC. Approximately 5% of her time is spent in this activity. She may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products and services based on the commission or fee amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another Enrolled Agent of their choosing. Additionally, as an investment adviser registered under the Securities Act of Washington and other applicable federal and state securities laws, Great Life Investing owes the client a fiduciary duty to put the Client's interest first which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith.

Item 5 - Additional Compensation

Crystal McMahon receives a salary from David Noble Insurance dba Great Life Planning. She does not receive any performance-based fees.

Item 6 - Supervision

Since Crystal McMahon is the sole owner and investment adviser representative of Great Life Investing she is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. She will adhere to the policies and procedures as described in the firm's Compliance Manual. She can be reached at Crystal@greatlifeinvesting.com or 253-858-2427.

Item 7 - Requirements for State-Registered Advisors

- A. Ms. McMahon has not been involved in any of the following:
1. An award or otherwise been found liable in an arbitration claim alleging damages in excess of \$2,500 involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
 2. An award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - a) An investment or an investment-related business or activity;
 - b) Fraud, false statement(s) or omissions;
 - c) Theft, embezzlement or other wrongful taking of property;
 - d) Bribery, forgery, counterfeiting, or extortion;
 - e) Dishonest, unfair or unethical practices.
- B. Ms. McMahon has not been the subject of a bankruptcy petition in the last ten years.