



S.A.F.E. Management LLC

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Form ADV Part 2A Client Brochure

Effective April 13th, 2020



This brochure provides information about the qualifications and business practices of SAFE Management LLC "SAFE." The firm CRD number is 289102. If you have any questions about the contents of this brochure, please contact Annette Raynor at 732.889-4309 or via email at info@safeadvglobal.com. The firm is also an NFA Member number 0439010 carrying the CTA and CPO designations.

SAFE is a Registered Investment Advisor with the State of New Jersey. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about SAFE to assist you in determining whether to retain the Advisor.

Additional information about SAFE and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov.



Item 2: Material Changes

Form ADV 2 is divided into two parts: Part a and Part b.

Part 2 a (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest.

Part 2 b (the “Brochure Supplement”) provides information about advisory personnel of SAFE.

SAFE Management LLC believes that communication and transparency are the foundation of our relationship and continually strives to provide you with the complete and accurate information. This Disclosure Brochure can be viewed on-line at the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov and on safeadvglobal.com

We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. We welcome your comments, questions, and feedback.

Material Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of SAFE Management LLC.

The following changes were made effective April 13th, 2020:

- 1) Item 4 was updated to add subheadings and additional service details
- 2) Item 4 was updated to give further client minimum investment details and use consistent terminology regarding managed account services
- 3) Item 5.A was updated to clarify SAFE Management advisory fees will not exceed 2% for administrative costs
- 4) Item 5 A was updated to add fee schedule
- 5) Item 5.A & 5.B were updated to show the general fee of up to 2% (in lieu of a stated range), provide a visual fee schedule, and clearly disclose negotiability of fees.
- 6) Item 5.B was updated to clarify SAFE’s creation and use of its own strategies.
- 7) Item 5 & 6 were updated to clarify performance-based fees
- 8) Item 8.A was updated to add additional information regarding ETFs
- 9) Item 8 was updated to add language that accommodates for black & white copies of the brochure and to reference updates made to Item 4.
- 10) Item 8 was updated to include additional risk disclosures and clarifications.
- 11) Item 8 was updated to clarify use of ETFs.
- 12) Item 11 was updated to further disclose/address potential conflict of interest
- 13) Item 11 was updated to avoid potentially misleading content.
- 14) Item 12 was updated to add clarifications of compensation, benefits and conflict of interest with Choicetrade.
- 15) Item 15 was updated to clarify SAFE’s level of custody



- 16) Item 19.B was updated to disclose that SAFE Management does not actively engage in any other business, as updated with examples and details of client investment discretion limitations and guidelines.

The following changes were made effective March 6th, 2020:

- 17) Item 1 and 2 were updated to reflect most current brochure title
- 18) Item 5.A was updated to clarify SAFE Management advisory fees will not exceed 3% for administrative costs
- 19) Item 5.D was updated to clarify SAFE and its supervised persons do not accept compensation for the sale of securities or other investment products.
- 20) Item 6 was updated to clarify SAFE Management advisory fees will not exceed 3% for administrative fees
- 21) Item 10 was updated to clarify SAFE Management or any supervised persons does/do not have any relationships to firms that may cause a conflict of interest.
- 22) Item 11 was updated to further disclose/address potential conflict of interest
- 23) Item 12 was updated to include more detail and disclosures regarding SAFE's recommendation of and relationship with Choicetrade.
- 24) Item 15 was updated to clarify SAFE's level of custody
- 25) Item 16 was updated with examples and details of client investment discretion limitations and guidelines.
- 26) Item 19.B was updated with additional details regarding Annette Raynor's business activities.

The following changes were made effective February 6th, 2020:

- 27) Item 4: Advisory Services Section A was updated to reflect SAFE Management resumed providing advisory services in June of 2018.
- 28) Item 4: Advisory Services Section B expanded its description of advisory services and client definitions
- 29) Item 4 was updated to reflect assets under management as of December 31st, 2019.
- 30) Item 5 Fees and Compensation was expanded to include a more in-depth description of fees. All item 5 sections have changes to prior disclosure.
- 31) Item 6: Performance Based Fees was modified to include a more defined description.
- 32) Item 7: Types of Clients were modified to reflect the various clients as described in Section 4
- 33) Item 8 was modified to include potential risks associated with the trading of each type of investment/security
- 34) Item 10 was updated to reflect the current status of brokerage relationships
- 35) Item 11, Subsection Duty of Care, Sub item H was expanded with additional descriptions and definitions
- 36) Item 4, 11 were updated to reflect the replacement of "High Net Worth" with "Accredited"
- 37) Item 12: Brokerage Practices was expanded to include further definition and description of brokerage relationships
- 38) Item 15: Custody was expanded with further definition of collection of fees



- 39) Item 16: Investment Discretion was updated to include further explanation for managed services and client discretion
- 40) Item 17: Voting Client Securities was expanded to include how the client will receive their proxies and notices.
- 41) Item 18 was updated to include that SAFE Management LLC was never the subject of a bankruptcy

The following changes were made effective July 23rd, 2019:

- 42) The cover page and company website were amended to reflect the company is a State Registered Investment Adviser and not an SEC regulated advisor.
- 43) Advisory Services (Item 4) was expanded to define that custom portfolio management enables client restrictions on particular securities or investments and Managed Services does not allow for client directed restrictions.
- 44) Item 4 was expanded to define the company does not participate in Wrap Fee programs.
- 45) Assets under Management (AUM) was added to Item 4 as per the period ending March 31st, 2019.
- 46) Advisory Fees – Item 5 was amended to reflect all fees are billed in arrears at the period close and collected from assets held.
- 47) Item 5 was further expanded to state that advisory fees will not exceed 3% annually and that lower fees for comparable services may be available from other sources.
- 48) Disciplinary information is stated in Section 9 and restated in Section 19d.
- 49) Item 12 includes the recommended brokerage firm for SAFE Management's clients.
- 50) Item 16 has been expanded to define the commission structure of the brokerage firm.
- 51) Item 19 has been expanded to include Section f) Additional disclosure.

The following changes were made effective June 15th, 2019:

- 1) Our address was changed to 234 Industrial Way West, Bldg A, Suite 202, Eatontown, NJ 07724.
- 2) Section 9 – Disciplinary Information has been modified to be specific disciplinary actions for SAFE Management LLC.
- 3) Section 19D includes all disciplinary disclosure of SAFE Management related parties, specifically its parent firm: Investview Inc.
- 4) Section 12 Brokerage Practices was modified to reflect that SAFE Management works with brokerage firms who accepts SAFE Management as the advisor/manager for the client account.

The following changes were made effective December 1st, 2018:

- 1) Advisory Fees for managed trade services range from .25 to 2.0% Annually.
- 2) Legal Disclosure was updated to include legal and regulatory matters of Investview, Inc., the principal owner of SAFE Management.
- 3) SAFE became registered as a Commodity Trading Advisor (“CTA”) and Commodity Pool Operator with the Commodity Futures Trading Commission (“CFTC”) on July 31,



2018. SAFE became an approved National Futures Association (“NFA”) Member firm on August 16, 2018, NFA ID# 0439010. All information regarding our FOREX and Commodities is included in SAFE Management LLC CTA Disclosure Brochure.

- 4) References to Forex and Commodities advisory services are removed from this brochure and included in as part of SAFE Managements Commodity Trading Advisor Disclosure Brochure.



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Item 4: Advisory Services

A. Firm Information

SAFE Management LLC ("SAFE" or "Advisor") is a Registered Investment Advisor with the State of New Jersey, which is organized as a Limited Liability Company (LLC) under the laws of the state of New Jersey. SAFE Management is a wholly owned subsidiary of Investview Inc. (a publicly traded company listed with the symbol OTCQB: INVU.)

SAFE Management LLC was founded in 2006 by Annette Raynor and then sold to Investview Inc. in 2012. Investview ceased advisory operations in 2014 and SAFE's licensing expired. Annette Raynor became COO of Investview in April of 2017 and re-established SAFE Management's registrations and licenses. Advisory operations through SAFE Management resumed in June 2018.

SAFE Management is operated by Annette Raynor, the Managing Member, Compliance Officer and Investment Registered Advisor Representative with the individual CRD number of 5167290.

Our goal is to provide the necessary global market information to both institutional and individual clients. As a firm that believes in the application of emerging technologies to the financial markets, we feel strongly about being able to offer Clients of all levels of net worth a dynamic investment solution that can help them excel.

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by SAFE.

B. Advisory Services Offered

SAFE provides accredited investors and institutional clients with access to emerging financial markets, opportunities and training. Customized portfolios, trade management services (i.e. buying, selling, or trading of assets on behalf of the client), and customized offerings are tailored to the needs of the client. Fees for these services are dependent upon the size, scope and level of management desired by the institutional client. SAFE provides investment advisory services and portfolio management services and we do not provide securities custodial or other administrative services. Customized portfolio services enable the client to restrict investing into certain securities and have a highly customized investment model.

Emerging Financial Markets, Opportunities, Training

SAFE Management provides access to and/or referrals for emerging financial markets, opportunities and various online training resources to accredited investors and institutional



clients through third-party entities. These services may include products offered by separate Investview Inc. wholly-owned subsidiaries that may require separate subscriptions or fees. SAFE does not receive any compensation or special benefit for referring clients to such services. SAFE does not have any conflict of interest in referring third-party services or products, outside of being indirectly connected through a shared parent company.

Customized Portfolios and Offerings

SAFE reviews the details of each Client's investment guiding principles, risk tolerance, portfolio asset allocation, investment selection, and performance expectations. Based on client needs, SAFE can work with individual clients to provide customized portfolios and offerings through its unique portfolio strategies. These strategies include a general allocation of assets (i.e. stock, bonds, cash, ETFs and mutual funds and private funds/alternative investment vehicles) along with any necessary risk characteristics and/or return expectations. SAFE chooses securities based on a comprehensive review of their valuation in both a qualitative and quantitative manner. Market performance for securities, in regard to their respective grouping, and their expected performance are also reviewed.

Trade Management Services

SAFE offers automated trade management service through which clients are invested in a range of investment strategies implemented by SAFE. All client portfolio funds are held in the client's designated brokerage account. SAFE collects information from the client, primarily through the client registration process, to assist in determining the client's individual financial situation and risk tolerance. SAFE's investment strategies are applied in a manner to create the best possible benefit for the client, while minimizing associated risks.

Accredited Investors

An accredited or sophisticated investor is an investor with a special status under financial regulation laws. Generally, accredited investors include high-net-worth individuals, banks, financial institutions and other large corporations, who have access to complex and higher-risk investments such as venture capital, hedge funds and angel investments.

Institutional Investors

An institutional investor is an entity which pools money to purchase securities, real property, and other investment assets or originate loans. Institutional investors include banks, credit unions, insurance companies,



pensions, hedge funds, REITs, investment advisors, endowments, and mutual funds.

At no time will SAFE accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

We include the following investment vehicles in our analysis, research and potential recommendations that include but are not limited to U.S. equities, options, index options, exchange traded funds, foreign exchange, and potentially private investment funds. We do not offer mutual funds as we believe a balanced portfolio of exchange traded funds can provide similar returns with greatly reduced management fees.

Self-Directed Investors

Self-directed investing is the activity of individual investors trading stocks, bonds, funds, and other securities on their own behalf. While they often use discount brokers and online trading, they don't rely on other people choosing what and when to buy and sell.

There are instances where self-directed investors lack the time to properly trade for themselves. SAFE Management provides self-directed individuals access to **managed account trading services** to specific trade strategies we offer. Managed Account Trading involves SAFE Management making trades in a client account, for the benefit of the client according to one of the managed trade strategies we offer. These clients are not subject to the same minimum investment requirement as our Accredited Investor and Institutional advisory services which typically stands at \$100,000 USD per client. Individual managed account trading services are provided according to our fee schedule and provides individuals an understanding and access to the world of foreign exchange, index options, exchange traded funds (ETF's) and defined market strategies. Our managed account services do not provide customized portfolio creation, individual financial analysis or financial planning. In addition, trade management services do not allow the client to impose restrictions on investing in particular securities.

SAFE Management does not participate in any Wrap-fee programs, our compensation is derived solely from our advisory fees.

SAFE Management has a total of \$812,158.18 discretionary assets under management as of December 31st, 2019. SAFE does not have any non-discretionary assets under management.



Prior to rendering investment advisory services, SAFE will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s].

Item 5: Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of SAFE and the Client.

SAFE and its supervised persons do not accept compensation for the sale of securities or other investment products.

A. Institutional and Accredited Investor Advisory Services

Custom portfolio design and management services provided to institutional and accredited clients have a customized fee schedule tailored to the needs and requirements of the client. These fees can range from 0.25% to 2.0% of assets under management billed either monthly or quarterly upon the period close. Each customized portfolio will have a negotiable fee based upon the number and type of investment strategies deployed and the overall size of the managed account. These fees are deducted from the assets. The minimum account size is \$100,000., but SAFE Management, at its discretion, may accept accounts below this minimum. The general fee structure is as listed below.

Assets Under Management	Equity (Annual Fee%)
\$100,000 - \$500,000	2.0%
\$500,000 - \$750,000	1.5%
\$750,000 - \$1,000,000	1.25%
\$1,000,000 - \$2,000,000	1.15%
\$2,000,000 - \$5,000,000	0.90%
\$5,000,000 - \$10,000,000	0.60%
Over \$10,000,000	To be negotiated with client

The above fees may vary depending upon the services provided and can be negotiated on an individual basis. SAFE's annual management fee is exclusive of, and in addition to, brokerage commissions, transaction fees and other related costs and expenses that the Client may incur. SAFE does not receive any portion of these commissions, fees and costs. For certain "qualified" accounts; performance-based fees may be offered. If Client requests additional personal administrative or other special services (as distinguished from the general investment advisory services outlined in this brochure), SAFE may charge the Client separately for such other services at a rate to be negotiated with the Client.

In no event will SAFE Management advisory fees exceed 2% for administrative costs.



The client should know that lower fees for comparable services may be available from other sources.

B. Managed Trading Services

Advisory Services provided to individuals via our managed trade services program are provided at 2.0% annual fee of assets under management. These fees are pro-rated and billed monthly or quarterly after the close of the period. This fee may be reduced on a discretionary basis as determined by the firm. Reduced fee structures are typically made available when a large number of individual clients are made aware of our services through one company, entity, club, group, or membership program.

SAFE Management creates and manages its own investment strategies.

Currently, managed trade services are provided to our U.S. clients at Choicetrade for our Equity and Wealth Builder strategies.

We offer an FX Global trade strategy as a CTA (Commodity Trading Advisor) and this is offered through Oanda for our US clients and Gleneagle Securities Pty Limited trading as Global Prime FX for international clients.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than the Advisor, in connection with investment made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Investment Advisory Fee charged by SAFE is separate and distinct from these custodian and execution fees. In addition, all fees paid to SAFE for investment advisory services are separate and distinct from the expenses charged by exchange-traded funds to their shareholders, if applicable.

D. Payment of Fees and Termination

Institutional and Customized Portfolio Services

SAFE is compensated for its services after the quarter or month in which investment advisory services are rendered.

Client fees will be deducted by the brokerage firm and paid to SAFE Management. The client will authorize the broker to collect such fees and will accept monthly or quarterly billing based upon the brokerage firm requirements.

Currently, Choicetrade collects SAFE Management fees on a quarterly basis, billed the first week after the quarter ends and based upon the account value on the last day of the calendar quarter. SAFE Management is collecting its fees in arrears; therefore, a cancellation



will not be subject to a refund but will be charged a pro-rated fee for the period of services rendered up to and including the date of cancellation.

Individual Advisory Services

Individuals using our managed trade services or access to certain investment services may cancel their agreement with five (5) written or electronic notice at any time.

Client fees will be deducted by the brokerage firm and paid to SAFE Management. The client will authorize the broker to collect such fees and will accept monthly or quarterly billing based upon the brokerage firm requirements.

Currently, Choicetrade collects SAFE Management fees on a quarterly basis, billed the first week after the quarter ends and based upon the account value on the last day of the calendar quarter. SAFE Management is collecting its fees in arrears; therefore, a cancellation will not be subject to a refund but will be charged a pro-rated fee for the period of services rendered up to and including the date of cancellation.

SAFE and its supervised persons do not accept compensation for the sale of securities or other investment products.

Item 6: Performance Based Fees

SAFE Management does NOT offer any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

In the event an institutional client requires the creation of a private investment fund or offering, fees (either performance or management based) will be defined by the offering created. In no event will these fees exceed 2% for management fees.

Item 7: Types of Clients

A. Institutional and Accredited Clients

Institutional and Accredited clients may include accredited, qualified investors, Trusts, Charitable Institutions, Foundations, and endowments. The minimum account size is \$100,000., but SAFE Management, at its discretion, may accept accounts below this minimum.

B. Individuals

The minimum account size for individuals who desire to access our managed account services is \$500. Individuals may desire to participate in an investment vehicle that requires a higher initial investment in which case SAFE will provide the recommended minimum investment amounts to the individual.



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

The firm deploys a number of strategies and analysis based upon the investment vehicle offered. Both individuals and institutions have a desire to access investments that they may not fully understand and require additional education, research and information. SAFE provides this information for each type of securities class as outlined in Item 4.

A. Exchange Traded Funds

SAFE currently uses both leveraged and inverse ETFs and employs Direxion's Daily S&P 500 Bull and Bear (Inverse) 3X Shares ETFs on a short-term basis as part of its portfolio construction. Leveraged and inverse ETFs pursue daily leveraged investment objectives which means they are riskier than alternatives which do not use leverage. They seek daily goals and should not be expected to precisely track the underlying index over periods longer than one day. They are not suitable for all investors and should be utilized only by investors who understand leverage risk and who actively manage their investments or engage an advisor to actively manage their investments. An investor should carefully consider a Fund's investment objective, risks, charges, and expenses before investing. A Fund's prospectus and summary prospectus contain this and other information about the Direxion Shares. To obtain a Fund's prospectus and summary prospectus, clients can visit www.direxion.com. A Fund's prospectus and summary prospectus should be read carefully before investing.

SAFE evaluates the full scope of exchange traded funds on a monthly basis according to a number of criteria including but not limited to:

- Underlying index
- Congruency to performance of underlying index
- Fees
- Performance
- Volatility
- Open Interest
- Liquidity
- Changes in management

The risks associated with Exchange Trade Funds include but are not limited to:

- The ETF not providing trading results that are congruent with the index it is designed to mimic
- A change in management of the Exchange Traded Fund
- An increase in fee structure for the ETF
- All General market risks as defined in bold/italics at the end of Section 8



B. Options and Index Options

Options are evaluated and applied based upon the specific investment objective of the client. As an example, options may be recommended as a method of protection or “hedge” against a large portfolio holding or pending market risk. Market risk comes in many forms including systemic risk such as war limiting access to manufacturing or increased prices in oil as just a basic example.

Technical analysis is applied along with fundamental conditions and price action including open interest, liquidity, and premiums.

The risks associated with the trading of Options and/or Index options include but are not limited to:

- lack of liquidity or demand for the specific option preventing the sale or purchase of the option to exit the position
- price value that increases or decreases dramatically creating a greater variance to the underlying asset. As an example, we may purchase an Apple (AAPL) \$320 strike March Call option for \$4.40, and then Apple may experience a significant product failure causing the stock to drop in price dramatically, rendering the option completely worthless. It should be noted that the most we can lose on that option is what we paid which is \$4.40.
- Increased volatility
- All General market risks as defined in blue at the end of Section 8

C. Algorithmic and Quantitative Analysis

Technology applied to analysis is extremely powerful and constantly changing. Programming combined with improved speed of calculations provides the ability for “machines” to constantly monitor and evaluate market conditions to meet pre-specified criteria. SAFE was established in 2006 based upon algorithmic technology and the ability to automatically identify the free cash flow of publicly traded companies, a metric that is now included in financial reporting. These technologies are now applied to a variety of markets and SAFE evaluated algorithms in a variety of areas and selects them based upon their continuity of performance.

The risks associated with the trading of Algorithms or Quantitative Analysis include but are not limited to:

- a change in performance due to changes in the market and/or key metrics of the program
- a change in programmer of the algorithm
- computational issues caused by technology and hardware, software, or electronic communication failures
- All General market risks as defined in blue at the end of Section 8



SAFE does not subscribe to high frequency trading and/or black box type technologies. We believe this undermines the very nature of free market principles.

D. Emerging Markets and Newly Created Investment Vehicles

Emerging markets and newly created investment vehicles lack a track record and additional research and analysis is required. SAFE provides clients access to this information through our research and trade team that monitors and analyzes weekly options, and newly created ETF's.

There is no one method we deploy to portfolio management and investment selection. Our investment advice is centered on education and knowledge transference. We believe our clients need to be active participants in the investments they make. In addition, we find that many clients have a specific desire to participate in a certain market and are seeking information on how to best approach that market. We provide this information, education and guidance as defined by the objectives of the client.

Additionally, the use of technologies in investing involves an element of “cybersecurity” risk. Cybersecurity risks include potential situations (intentional or unintentional) wherein SAFE or an associated third-party service provider, may experience a loss or corruption of data, the unauthorized release or other misuse of confidential information (including a third-party obtaining unauthorized access to clients’ information, including social security numbers, home addresses, account numbers, account balances, and account holdings, etc.), or a generally compromised ability for SAFE to adequately conduct its business. Although SAFE has established risk management systems designed to reduce the risks associated with cybersecurity elements, inherent limitations exist, specifically due the possibility that both current and future risks may not have not been identified or detected.

We stress to all our clients that investing of any type, in any security involves a risk of loss that clients should be prepared to bear.

General Risks of Trading:

Material Risks include, but are not limited to, regulatory changes and applications, legislative changes, credit changes and considerations, liquidity of assets, valuation of assets, volatility in various markets, market types and changes, software issues (malfunction, viruses, loss of internet, etc.), systemic internal or platform issues, foreign investment challenges, interest changes, small company limitations, sentiment and adverse global conditions. Any number of events can render a market, company or security worthless.

Item 9: SAFE Management Disciplinary Information

There are no legal, regulatory or disciplinary events involving SAFE or any of its employees. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **289102** in the field labeled “Firm IARD/CRD Number”. This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.



Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

As previously noted, there are no legal, civil or disciplinary events to disclose regarding SAFE or its advisory persons.

Investview, Inc., one of the principals of SAFE, has been involved in the following legal matters, which are summarized below.

- a) On November 1, 2017, we filed a lawsuit in the Fourth Judicial District Court for Utah County, State of Utah, Wealth Generators, LLC, v. Evan Cabral, Daniel Lopez, John Legarreta, Johnathan Lopez, Julian Kuschner, Nick Gomez, Luke Shulla, Nestor Velazquez, Christopher Terry, Isis De La Torre, Alex Morton, Ivan Briongos, Brandon Boyd, and International Markets Live Ltd. d/b/a iMarketslive, Civil No. 170401615, alleging corporate espionage and misappropriation of corporate information. The lawsuit alleges that International Markets Live Ltd., dba iMarketslive, conspired with a number of individuals affiliated with Wealth Generators to steal our confidential information, intellectual property, and trade secrets. On September 27, 2018, the court issued its ruling granting in part and denying in part our motion for preliminary injunction. On January 2, 2019, the parties entered into a settlement agreement in which they agreed to release all claims and have the litigation dismissed with prejudice, with neither party making any payment to the other, but with the defendants agreeing to make a \$5,000 donation to charity. On February 22, 2019, the matter was dismissed with prejudice.
- b) In February 2018, Wealth Generators now Kuvera LLC (a wholly owned subsidiary of Investview) received a subpoena from the United States Commodity Futures Trading Commission ("CFTC"). Wealth Generators/Kuvera complied with the terms of the subpoena, negotiated a resolution of this matter with the CFTC staff, and a final order was issued on September 14, 2018. Under the order, Wealth Generators did not admit or deny any of the allegations, agreed to pay a fine of \$150,000, and agreed not to act as an unregistered commodities trading advisor in the future. As of March 31, 2019, Kuvera has paid \$90,000 to the CFTC and the remaining unpaid balance has been included in accounts payable and accrued liabilities on Investview's consolidated balance sheet.
- c) Jim Westphal filed a wage claim against Kuvera, LLC (at the time named Wealth Generators, LLC), in the United States District Court for the District of Utah, Central Division (Case No. 2:18-cv-00080) in the amount of \$6,500 plus liquidated damages. Mr. Westphal is claiming unpaid overtime wages. Kuvera contends that Mr. Westphal was an independent contractor, hired on a limited basis to perform software services, and is accordingly not entitled to overtime payments under the Fair Labor Standards Act. Moreover, Mr. Westphal never provided the promised software pursuant to the parties' agreement. Kuvera filed a counterclaim on July 12, 2018, seeking damages of approximately \$20,000 and demanding a jury trial. In December 2018, the parties



settled the matter with a joint motion. As a result of the settlement, Kuvera paid Mr. Westphal \$1,500 and the case was dismissed.

- d) In April of 2019, Investview received a summons and complaint from Fibernet Corp making claims of unpaid invoices and breach of contracts entered into in February 2012 and January 2015 as Razor Data Corp. Without admitting fault or liability, in June of 2019, Investview entered into an agreement with Fibernet Corp to settle all claims and release Investview from any future claims in exchange for a payment of \$35,160 to avoid ongoing litigation related to this matter.

Item 10: Other Financial Activities and Affiliations

SAFE is a wholly owned subsidiary of Investview Inc., a publicly traded company that owns a number of subsidiaries. At the present time, SAFE, Investview and its subsidiaries are not broker-dealers.

SAFE became registered as a Commodity Trading Advisor (“CTA”) and Commodity Pool Operator with the Commodity Futures Trading Commission (“CFTC”) on July 31, 2018. SAFE became an approved National Futures Association (“NFA”) Member firm on August 16, 2018, NFA ID# 0439010. All information regarding our FOREX and Commodities is included in SAFE Management LLC CTA Disclosure Brochure.

At the present time, SAFE Management nor any supervised persons are currently registered as broker-dealers or have any pending applications as broker-dealers or a registered representative of a broker dealer. SAFE Management or any supervised persons does/do not have any relationships to firms that may cause a conflict of interest.

SAFE Management does not select other advisor (s) for its clients.

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

Code of Ethics

SAFE has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with the firm. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. SAFE and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of SAFE associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code.

Our Code of Ethics addresses two fiduciary standards: Duty of Care and Duty of Loyalty.



Duty of Care

- a) SAFE employees must
 - i. act and provide advice that is in the best interest of the client,
 - ii. seek best execution of a client's transactions,
 - iii. provide advice and monitoring.
- b) SAFE will make a reasonable inquiry into a client's financial situation, level of financial sophistication, investment experience, and investment objectives.
- c) SAFE maintains the duty to provide personalized investment advice that is suitable for and in the best interest of the client based on the client's investment profile, risk tolerance and investment objectives.
- d) SAFE will seek periodic updates from clients to assess their evolving financial situation, investment objectives and risk tolerance at a minimum of once per year and more frequently based upon the agreement with the client as defined in the advisory services agreement.
- e) SAFE will provide clients with a complete understanding of fees and associated with risks with various investments. If a client desires an investment that carries fees that the advisor believes is not in the best interest of the client, SAFE will make this information known to the client both verbally and in writing.
- f) SAFE will act in the best interests of its clients and embraces an obligation to secure the best possible cost and execution of the benefit of the client.
- g) SAFE Management LLC is a wholly owned subsidiary of Investview Inc., a Nevada Corporation, publicly traded on the OTCQB with the symbol INVU. SAFE Management LLC does not and will not recommend the purchase of Investview shares to its advisory clients.
- h) SAFE Management or any related person may recommend to clients or buy or sells for clients' accounts investments in which the adviser may also be invested. As an example, all of our trade strategies that are offered under managed services, are also traded in a live account held in the name of SAFE Management or one of its managers. The SAFE Management or associated account may receive an execution on a trade that is better or worse than one received by a client. SAFE Management receiving better execution on a trade is considered a conflict of interest. All trades are issued simultaneously, and SAFE Management associated account will receive a fill that is commensurate with the market at the time of the trade. Any conflict of interest will be addressed and handled as outlined in the Duty of Loyalty and other sections of this brochure.
- i) Take all reasonable measures to protect the confidentiality of non-public client information obtained or developed in connection with their investment activities, and to prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory process.



- j) Regulatory statutes require that we collect and maintain certain sensitive personal information including social security numbers, valid drivers license, proof of citizenship and passport information. The firm commits to protect this information in accordance with Sarbanes Oxley (SOX) compliance and to provide the individual client control over who the information is shared with as defined in GDPR – General Data Protection Regulation.

Duty of Loyalty

- a) The advisor places the client interest ahead of its own.
- b) The advisor will not unfairly favor one client over another.
- c) The advisor will make full and fair disclosure of all material facts relating to the advisory relationship.
- d) The advisor will not favor institutional or Accredited clients over individual clients.
- e) The advisor and its employees are able to own and trade the same securities that clients hold, and the advisor and its employees commit to purchase and/or sell these securities with full disclosure and according to defined regulatory guidance.
- f) The advisor will engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.

In addition to our Duty of Care and Duty of Loyalty, SAFE Management and its financial representatives and employees commit to the following ethics of transparent communication and adherence to the law.

- a) Produce, to the best of SAFE's ability, full, fair, accurate, timely and understandable disclosure, in compliance with applicable accounting standards, in reports and documents that SAFE Management files with, or submits to, the U.S. Securities and Exchange Commission, State of New Jersey Division of Consumer Affairs/Board of Securities or any applicable regulatory body and in other public communications made by the firm. (NOTE: SAFE's self-determination of the quality/status of its practices and documents are not representative of the findings of any federal or state agencies or regulatory entities)
- b) Act in good faith, responsibly, with due care, competence, prudence and diligence, without misrepresenting material facts or allowing one's independent judgment or decisions to be subordinated.
- c) Comply with governmental laws, rules and regulation applicable to the Advisor and its respective businesses.
- d) Promptly notify the Audit, Disclosure, Senior Management or Compliance department of any perceived or potential concern regarding deficiencies in reporting, weaknesses in operation, conflicts of interest, fraud, or any other matter which could have a material adverse impact on the firm's ability to operate in the best interest of its clients.



- e) Facilitate the work of the company's independent auditors and shall not, directly or indirectly, take any action to fraudulently influence, coerce, manipulate or mislead the independent auditors.
- f) The firms' employees are responsible to adhere to the Code of Ethics, report any violations of the code and the firm commits to protect and prevent any retaliation against an employee who reports a violation.

This is our complete Code of Ethics and is maintained and updated as part of our Client Brochure at all times. This brochure and the Code of Ethics will be provided to all prospective and new clients at the time of engagement. This will also be provided upon request at any time.

Item 12: Brokerage Practices

Advisory services provided by SAFE Management will be provided on brokerage firms that have approved SAFE Management LLC as a manager for the client account. The client may request a specific broker for SAFE Management to use and SAFE will attempt to engage such brokerage firm if they conform to our regulatory requirements. There is no assurance made by SAFE Management that the brokerage firm requested by the client will accommodate SAFE Management as the advisor. SAFE does not accept commissions, or fees with any of these firms. We are paid for our services by our clients for the services we provide to them according Section 5 of this brochure and as defined in the Investment Advisory Services agreement. Additional details of SAFE's practices and policies regarding affiliations, economic relationships, and conflicts of interest can be found throughout the other sections of this brochure.

Choicetrade LLC (CRD#: 104021/SEC#: 8-52511) is the broker recommended for SAFE Management managed services. Not all advisers require their clients to direct brokerage through a specific broker-dealer

Choicetrade LLC ("Choicetrade") was selected as our recommended broker based upon the following:

- Conforms to regulatory requirements
- Accepted SAFE Management as an advisor on their platform
- Provides SAFE Management, trade management tools that enables SAFE to manage multiple client accounts utilizing our strategies

In addition to the above factors, SAFE has determined that Choicetrade's fees are reasonable and fair as it pertains to general industry standards and in comparison to other brokerage options. Additionally, SAFE believes its relationship with Choicetrade is one that offers the best options for clients. Details regarding SAFE's relationship with Choicetrade, including compensation, benefits, and possible conflicts of interest, are duly outlined throughout this brochure.

SAFE Management does not aggregate orders on behalf of the client accounts. This may or may not have an effect on the total outcome of the trade, including the profitability of the trade, for individual clients A trade is executed at the account level and the account is charged a brokerage commission by the brokerage firm that is commensurate with the



broker's commission fee schedule. SAFE might not achieve the most favorable executions for client transactions. Costs to clients may potentially increase if brokerage is directed to Choicetrade or if client self-directs brokerage.

SAFE Management does not accept any compensation or benefits from Choicetrade (or other brokers) for client referrals, directed brokerage or any research/soft dollar benefits. The brokerage firm is selected purely on transaction fees charged to our clients, and tools provided to SAFE to properly manage client accounts. As such, SAFE does not have any conflicts of interest in regards to Choicetrade (or other brokers), outside of any conflicts of interest as outlined in Item 11.

Item 13: Review of Accounts

All investment accounts and investments represented are reviewed weekly, if not daily, for performance and potential risk. Review of individual or institutional portfolios managed by us against investor objectives are reviewed monthly with a client consultation quarterly. In the event the client is not available to review objectives quarterly, the firm will require the client to review investment objectives on an annual basis.

Annette Raynor, Investment Adviser Representative and Manager is responsible for the client portfolio and account reviews. Review of all current accounts takes place monthly. A weekly review of balances takes place and accounts with a weekly variance greater than 2% are identified for immediate review.

Client reports and balances are available to the client daily from the brokerage firm. SAFE Management will issue general reports from time to time on portfolio and strategy performance. These reports are not client specific and delivered via email.

Item 14: Client Referrals and Other Compensation

SAFE is a registered investment advisor, which receives its compensation directly from its Clients. SAFE may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, SAFE may receive referrals of new Clients from a third-party. SAFE does not engage paid solicitors for Client. SAFE does not accept or pay referral fees.

Item 15: Custody

SAFE does not accept or maintain primary or full custody of any Client accounts, funds, or assets. All Clients must place their assets with a qualified custodian or brokerage firm. Clients are required to select their own custodian to retain their funds and securities and direct SAFE to utilize that custodian for the Client's securities transactions. In this regard, SAFE is considered to have "limited custody", but only in regards to the advisement fees paid to SAFE through the client's brokerage firm.

Managed Services are only available at brokerage firms that enable SAFE Management to place strategy trades. These brokerage firms may change at any time. Currently, Choicetrade LLC is the brokerage firm recommended for SAFE managed services. If client's funds are



qualified, some brokerage firms will require the client to use the custodian selected by the broker.

Client statements will be provided to client by the brokerage firm or qualified custodian directly to client. The client is urged carefully review these statements and immediately contact advisor if they have any questions or concerns. The statements will be available on a monthly basis. All trade confirmations and activity are available to the client by logging in to their brokerage account directly.

Item 16: Investment Discretion

SAFE generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by SAFE. (Example: Client may select specific percentages of allocation of funds) Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by SAFE will be in accordance with each Client's investment objectives and goals.

Choicetrade LLC (CRD#: 104021/SEC#: 8-52511) is the broker recommended by SAFE Management for its advisory services. The client is required to open a brokerage account with Choicetrade and accept all brokerage terms, fees and conditions in conjunction with SAFE Management's advisory agreement.

All SAFE Management advisory clients may not place trades in the SAFE managed brokerage account. If a client wishes to place a trade on their own behalf, they must establish a self-directed account or utilize SAFE advisory services for Accredited and Institutional clients.

Item 17: Voting Client Securities

SAFE does not accept proxy-voting responsibility for the Client. The brokerage firm will supply the client directly with proxies or other solicitations. SAFE will provide general information and answer client questions related to the proxy or solicitation should the client request this information.

The client will receive their proxies or other solicitations directly from their brokerage firm, custodian or a transfer agent. Upon receipt, if the client has any questions about the communication, they may contact SAFE Management for explanation and guidance.

Item 18: Financial Information

Registered Investment Advisors are required in this Item to provide you with certain financial information or disclosures about SAFE's financial condition. SAFE does not require or solicit the prepayment of any advisory fees and does not have any adverse financial condition that is reasonably likely to impair our ability to continuously meet our contractual commitments to our Clients.



SAFE Management LLC has never been the subject of a bankruptcy petition.

Item 19: Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officers

Annette Raynor is the Managing Member of SAFE and also serves as the firm's Chief Compliance Officer. Information regarding the formal education and background of Ms. Raynor is included in Item 2 of the officer's Part 2B enclosed.

B. Other Business Activities of the Principal Officer

SAFE Management LLC is not actively engaged in any other business. Annette Raynor is the Chief Operating Officer of Investview Inc., the parent company of SAFE Management LLC. Annette Raynor is not actively engaged in any other business and dedicates 60% of her time to SAFE operations and 40% to performing duties for SAFE's parent company, Investview Inc.

C. Performance Fee Calculations

Neither SAFE nor any of its supervised persons charge performance-based fees for its investment advisory services. The fees charged by SAFE are as described in Item 5 – Fees and Compensation.

D. Disciplinary Information

There are no legal, regulatory or disciplinary events involving SAFE or any of its employees. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. To review the firm information contained in ADV Part 1, select the option for Investment Adviser Firm and enter **289102** in the field labeled "Firm IARD/CRD Number". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices.

As previously noted, there are no legal, civil or disciplinary events to disclose regarding SAFE or its advisory persons.

Investview, Inc., one of the principals of SAFE, has been involved in the following legal matters, which are summarized below.

- a) On November 1, 2017, we filed a lawsuit in the Fourth Judicial District Court for Utah County, State of Utah, Wealth Generators, LLC, v. Evan Cabral, Daniel Lopez, John Legarreta, Johnathan Lopez, Julian Kuschner, Nick Gomez, Luke Shulla, Nestor Velazquez, Christopher Terry, Isis De La Torre, Alex Morton, Ivan Briongos, Brandon



Boyd, and International Markets Live Ltd. d/b/a iMarketslive, Civil No. 170401615, alleging corporate espionage and misappropriation of corporate information. The lawsuit alleges that International Markets Live Ltd., dba iMarketslive, conspired with a number of individuals affiliated with Wealth Generators to steal our confidential information, intellectual property, and trade secrets. On September 27, 2018, the court issued its ruling granting in part and denying in part our motion for preliminary injunction. On January 2, 2019, the parties entered into a settlement agreement in which they agreed to release all claims and have the litigation dismissed with prejudice, with neither party making any payment to the other, but with the defendants agreeing to make a \$5,000 donation to charity. On February 22, 2019, the matter was dismissed with prejudice.

- b) In February 2018, Wealth Generators now Kuvera LLC (a wholly owned subsidiary of Investview) received a subpoena from the United States Commodity Futures Trading Commission ("CFTC"). Wealth Generators/Kuvera complied with the terms of the subpoena, negotiated a resolution of this matter with the CFTC staff, and a final order was issued on September 14, 2018. Under the order, Wealth Generators did not admit or deny any of the allegations, agreed to pay a fine of \$150,000, and agreed not to act as an unregistered commodities trading advisor in the future. As of March 31, 2019, Kuvera has paid \$90,000 to the CFTC and the remaining unpaid balance has been included in accounts payable and accrued liabilities on Investview's consolidated balance sheet.
- c) Jim Westphal filed a wage claim against Kuvera, LLC (at the time named Wealth Generators, LLC), in the United States District Court for the District of Utah, Central Division (Case No. 2:18-cv-00080) in the amount of \$6,500 plus liquidated damages. Mr. Westphal is claiming unpaid overtime wages. Kuvera contends that Mr. Westphal was an independent contractor, hired on a limited basis to perform software services, and is accordingly not entitled to overtime payments under the Fair Labor Standards Act. Moreover, Mr. Westphal never provided the promised software pursuant to the parties' agreement. Kuvera filed a counterclaim on July 12, 2018, seeking damages of approximately \$20,000 and demanding a jury trial. In December 2018, the parties settled the matter with a joint motion. As a result of the settlement, Kuvera paid Mr. Westphal \$1,500 and the case was dismissed.
- d) In April of 2019, Investview received a summons and complaint from Fibernet Corp making claims of unpaid invoices and breach of contracts entered into in February 2012 and January 2015 as Razor Data Corp. Without admitting fault or liability, in June of 2019, Investview entered into an agreement with Fibernet Corp to settle all claims and release Investview from any future claims in exchange for a payment of \$35,160 to avoid ongoing litigation related to this matter.

E. Material Relationships with Issuers of Securities

SAFE Management LLC is a wholly owned subsidiary of Investview Inc., a Nevada Corporation, publicly traded on the OTCQB with the symbol INVU.



SAFE Management LLC does not recommend the purchase of Investview shares to its advisory clients.

F. Additional Disclosure

- a) SAFE Management LLC believes it has reasonably disclosed all material conflicts of interest.
- b) SAFE Management maintains a Business Continuity Plan (BCP) along with a Disaster Recovery and Cyber policies and escalation procedure. These documented procedures are reviewed semi-annually.



S.A.F.E. Management LLC

234 Industrial Way West Suite A202
Eatontown, NJ 07724
safeadvglobal.com

Form ADV Part 2B Individual Disclosure Brochure Supplement



Annette Raynor

Effective: April 13th, 2020
CRD: 5167290

This Brochure Supplement provides information about the background and qualifications of Annette Raynor (CRD# 5167290) in addition to the information contained in the SAFE Management LLC ("SAFE" or the "Advisor") Disclosure Brochure.

If you have not received a copy of SAFE's Brochure or if you any questions about the contents of this Brochure Supplement or SAFE's Disclosure Brochure, please contact us at (732) 889-4309 or by email at info@safeadvglobal.com.

Additional information about Annette Raynor is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.



Item 2: Educational Background and Business Experience

Annette Raynor, IAR

Year of Birth: 1964

Formal Education, Qualifications & Achievements

Registered Investment Advisor Representative (Series 65)
Commodities and Futures (Series 3)
Over the Counter FOREX (Series 34)
NJ Licensed Realtor
IPED, Channel Elite MBA Member & Completion of TechMark Business Simulator
Xerox Sales Training
Xerox Management Training
Xerox Train the Trainer
Channel Industry Advisor

Education

Port Richmond High School 1982

Employment History

Investview, Inc.

Chief Operations Officer

December 4th, 2019 – present

Upon the announcement of Joseph Cammarata as Chief Executive Officer of Investview Inc., Annette Raynor returned to her position as Chief Operations Officer.

Chief Executive Officer

July 23rd, 2019 – December 4th, 2019

Annette is the Chief Executive Officer for Investview Inc. and continues to operate in this role along with her Supervisory and Compliance role for SAFE Management.

Chief Operations Officer, Corporate Secretary

April 1st, 2017 – July 23rd, 2019

Annette is the Chief Operations Officer for Investview Inc. and continues to operate in this role along with her Supervisory, Compliance and Advisory role for SAFE Management LLC. As, COO she establishes company operating procedures, oversees corporate operations and subsidiary management processes. She participates in Corporate Strategy development and implementation along with the Executive Management team.



SAFE Management, LLC

Investment Advisor Representative/Compliance

April 1st, 2017 – present

March 2006 – 2014

Annette is responsible for management, marketing, conformance and structure of SAFE Management. She originally established the firm in March of 2006, sold the firm to Investview in 2014 and regained control on April 1st, 2017 when Investview acquired Ms. Raynor's company Wealth Generators LLC. Annette holds a Series 63, Series 3 and Series 34 license.

SAFE Management provides individuals financial advisory services. As a Registered Investment Advisor (RIA) they provide trade strategies that include equities, equity options, ETF's and research on emerging companies in technology. As a Commodity Trading Advisor (CTA) the company provides trade methodology and strategies for retail FOREX and commodity futures. SAFE Management, while established in 2006, re-launched its advisory services in the fourth quarter of 2018 renewing all licenses and registrations.

Kuvera LLC (formerly Wealth Generators LLC)

Chief Operations Officer

February 2013 – April 2017

Annette Raynor founded Wealth Generators LLC along with Ryan Smith, Chad Miller and Mario Romano. Wealth Generators was acquired by Investview Inc on April 1st, 2017 and renamed to Kuvera LLC in February of 2018.

Wealth Generators provides personal financial money management education, courses and technology to individuals who seek to improve management of their personal finances. The program is subscription based, delivered electronically and includes basic finance management education including budgeting, debt reduction, savings, and education on global financial markets including equities, options, ETF's, retail Forex and cryptocurrency courses.

Wealth Engineering LLC

Founder/Owner

February 2005 – present

Annette Raynor established Wealth Engineering LLC with Mario Romano in February of 2005. The firm invests, develops and brings to market financial research and technology tools for the benefit of the individual. Wealth Engineering is a shareholder of Investview and Ms. Raynor works full-time for Investview Inc. and SAFE Management LLC.

Wealth Engineering is a consultant to firms who provide financial information, education, research and technology. Wealth Engineering provides services, capital, and management services to these companies. Wealth Engineering does not accept new clients and primarily manages the companies they have acquired ownership in throughout the years.



The Financial U LLC

COO

December 2013 – April 2017

The Financial U LLC was established in December of 2013 by Dominic Romano and Kevin Raynor Jr. to provide financial education services to high school and college students. Annette Raynor assisted the founders in establishing the company and structure. She provides marketing advice on as needed basis via a contract arrangement.

Ms. Raynor may be contacted at:

Telephone: 732.889.4309

Email: annette@SAFEadvglobal.com

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Raynor. Annette Raynor has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Raynor.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil, or termination disciplinary events to disclose regarding Annette Raynor.

Financial Disclosure: Annette Raynor filed Chapter 7 Bankruptcy petition Case Number: 09-39218 which was fully discharged on February 17th, 2010.

However, we do encourage you to independently view the background of Annette Raynor on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 5167290 in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Annette Raynor is the Chief Operations Officer of Investview Inc., the parent company of SAFE Management. As the COO, she indirectly works for each of the subsidiaries of Investview Inc. which includes Kuvera LLC, United Games LLC, United League LLC, Apex Tek LLC and SAFETek LLC.



Annette Raynor is a 50% owner of Wealth Engineering, LLC, a private New Jersey limited liability company. Wealth Engineering's primary asset is its ownership shares of Investview Inc.

Item 5 – Additional Compensation

Annette Raynor is paid by Investview Inc. as Chief Operations Officer and her income is disclosed as publicly reported by Investview to the SEC. Investview filings can be found at sec.gov – company filings – [Investview](#). Supervised persons of SAFE Management do not receive any economic benefit for providing advisory services.

Item 6 – Supervision

Annette Raynor is the Manager, Compliance Officer, and Registered Investment Advisor Representative for SAFE Management. Investview Inc., the owner of SAFE Management issued a board resolution installing Ms. Raynor as the sole manager of the firm and all operations.

SAFE has implemented a Code of Ethics and internal compliance guidelines included in the independent audit of Investview Inc. the owner and parent of SAFE.

SAFE is subject to regulatory oversight by the New Jersey Bureau of Securities and the Securities and Exchange Commission.

As a Registered Entity, SAFE is subject to examinations by regulators, which may be announced or unannounced. SAFE is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

As a member of the National Futures Association, SAFE Management is subject to regulatory oversight by the Commodities and Futures Trade Commission.

Item 7: Requirements for State Registered Advisors

There are no legal, civil or disciplinary events to disclose regarding Ms. Raynor. Annette Raynor has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Raynor.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil, or termination disciplinary events to disclose regarding Annette Raynor.



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