



**S.A.F.E. Management LLC**

745 Hope Road Eatontown NJ 07724  
safeadvglobal.com

# Form ADV Part 2A Client Brochure

Effective December 1<sup>st</sup>, 2018



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 732.272.8852 or via email at [info@safeadvglobal.com](mailto:info@safeadvglobal.com).

SAFE is a Registered Investment Advisor with the U.S. Securities and Exchange Commission. 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.



## Item 2: Material Changes

Form ADV 2 is divided into two parts: Part 2A and Part 2B.

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

Part 2B (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 at all times.

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 December 1<sup>st</sup>, 2018:

- 1) Advisory Fees for automated 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.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



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## Item 4: Advisory Services

### A. Firm Information

SAFE Management LLC (“SAFE” or “Advisor”) is a Registered Investment Advisor with the U.S. Securities and Exchange Commission, which is organized as a Limited Liability Company (LLC) under the laws of the state of New Jersey. SAFE Management LLC was founded in 2006 and is a wholly owned subsidiary of Investview Inc. (a publicly traded company listed with the symbol OTCQB: INVU.) It is operated by Annette Raynor, the Managing Member, Compliance Officer and Investment Registered Advisor Representative with the individual CRD number of: 5167290

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

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.

### 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 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 will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. 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 emerging instruments such as binary options, weekly options, and emerging markets such as crypto currency. 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.

SAFE also provides self-directed individuals access to investment advisory services via automated information collection and analysis. Individual advisory services provided via our automated portal is 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 emerging financial instruments including binary options and crypto currency markets.

*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.

### A. Institutional and High Net Worth Advisory Services

Custom portfolio design and management services provided to institutional and high net worth clients have a customized fee schedule tailored to the needs and requirements of the client. These fees can range from .25% - 2.0% assets under management billed either monthly or quarterly with the initial payment made at time of investment.

At certain times an institutional client may require private client or private offering fund structures. Fees, in this arrangement, are defined by the offering and structure as mutually agreed upon by the parties.

### B. Individual Advisory Services

Advisory Services provided to individuals via our automated platform are provided at a 0.25% - 2.0% annual fee of assets under management. 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.

Certain investment strategies may incur a higher fee structure based upon the provider of the strategy and cost of the research and trade information. In this event, the advisory fees are defined at the investment level and all fee structures are accepted by the client in writing.

### 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.



A Client could invest in these products directly, without the services of SAFE, but would not receive the services provided by the firm which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client's financial condition and objectives. Accordingly, the Client should review both the fees charged by the investment vehicles proposed and the fees charged by SAFE to fully understand the total fees to be paid.

## D. Advance Payment of Fees and Termination

### Institutional and Customized Portfolio Services

SAFE is compensated for its services in advance of the quarter or month in which investment advisory services are rendered. Clients may request to terminate their Investment Advisory Agreement with SAFE, in whole or in part, by providing thirty (30) days advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. Upon the effective date of termination, the Advisor may refund any unearned, prepaid Investment Advisory Fees from the effective date of termination to the end of the quarterly or monthly period. SAFE will typically pro rate fees for accounts where the investment management agreement is terminated on a date creating less than a full quarter of investment management for either the initial or final month of the Agreement, and fees not earned may be refunded to the Client. The Advisor reserves the right not to pro rate its fees. The Client's Investment Advisory Agreement with the Advisor is non-transferable without Client's written approval.

### Individual Advisory Services

Individuals using our automated platform or access to certain investment services may cancel their agreement with five (5) written or electronic notice at any time. Advisory fees will immediately terminate and pro-rata portion of fees for the period will be returned to the client. Clients may be invested in security vehicles that require a (30 - 90) day notice of liquidation of which each client is made aware of prior to investment. The liquidation period and fee structure are specific to each type of investment and is rendered by the broker or provider of the investment. While SAFE will immediately cancel the advisory fees, SAFE is not responsible for the fee structure and termination agreement of the investment vehicle selected by the client.

## Item 6: Performance Based Fees

Currently, SAFE 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) however, SAFE may introduce this fee structure on certain investment strategies. In this case, the fees will be clearly defined in writing and accepted by the client at time of investment.

In the event an institutional client requires the creation of a private investment fund, fees (either performance or management based) will be defined by the offering created.



## Item 7: Types of Clients

### A. Institutional and High Net Worth Clients

Institutional and High Net Worth clients may include accredited and qualified investors, Trusts, Charitable Institutions, Foundations, Endowments, Corporate Pension and Profit Sharing Plans. The minimum account size is \$100,000., but at its discretion, may accept accounts below this minimum.

### B. Individuals

The minimum account size for individuals who desire to access our automated platform and 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.

### A. Exchange Traded Funds

We evaluate 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

### 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.

### 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.

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, binary options, newly created ETF’s and the emerging crypto currency market.

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.

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.

Risks include, but are not limited to, regulatory, legislative, credit, liquidity, valuation, volatility, market, software, systemic, sentiment and global conditions. Any number of events can render a market, company or security worthless.

## Item 9: 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](http://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.

**Investview, Inc.**, the principal owner of SAFE, has been involved in the following legal matters, which are summarized below.

- a) On November 1, 2017, Investview, Inc. 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 iMarketlive, Civil No. 170401615, alleging corporate espionage and misappropriation of corporate information. The lawsuit alleges that International Markets Live Ltd., dba iMarketlive, conspired with a number of individuals affiliated with Wealth Generators to steal our confidential information, intellectual property, and trade secrets. Investview, Inc is seeking injunctive relief to protect its business and damages of not less than \$300,000.
- b) On September 14<sup>th</sup>, 2018, Wealth Generators, LLC, a subsidiary of Investview, was issued an Order by the United States Commodity Futures Trading Commission (“CFTC”) Docket 18-27 regarding the activities of Wealth Generators, LLC, one of its subsidiaries. Investview, Inc. proposed a negotiated resolution of the matter with the CFTC which was accepted. The order finds that Wealth Generators, through its automated trading convenience tools acted as a Commodity Trading Advisor without being registered as such, Wealth Generators, LLC without admitting or denying any of the allegations, will pay a fine of \$150,000, and will agree not to act as an unregistered Commodities Trading Advisor in the future. A copy of the CFTC Order dated September 14, 2018 can be found here:  
<https://www.cftc.gov/sites/default/files/2018-09/enfwealthgeneratorsorder091418.pdf>
- c) In January, 2018, Jim Westpfahl filed a wage claim against Wealth Generators, LLC (a company that was later acquired by Investview, Inc), in the United States District Court for the District of Utah, Central Division (Case No. 2:18-cv-00080, District Judge Dale A. Kimball and Magistrate Judge Evelyn J. Furse) in the amount of \$6,500 plus liquidated damages. Plaintiff is claiming unpaid overtime wages. Wealth Generators contends that Mr. Westpfahl 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, Plaintiff never provided the promised software pursuant to the parties’ agreement. The Magistrate Judge ordered both parties to provide specific disclosures to the other side and both parties have complied. The Parties were ordered to meet and confer in a good faith effort to settle the matter on or before June 12, 2018. The parties were unable to settle the matter and as of June 19, 2018, we are preparing to proceed with filing appropriate counterclaims against Mr. Westpfahl.



## 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.

## 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) 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.
- h) 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 high net worth 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 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.
- 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.

## Item 12: Brokerage Practices

A client is free to use their brokerage of choice. At times, SAFE will suggest a broker dealer based upon a specific client needs that is best met by the broker dealer suggested. At other times, we will suggest a broker dealer based upon the type of security as not all firms offer all securities. SAFE does not accept commissions, or fees with any of these firms. We predominantly 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. If we are also paid by a brokerage firm, this information will be disclosed to the client for any trading product or program where compensation from the broker takes place.

## 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.

## Item 14: Client Referrals and Other Compensation

SAFE is a registered investment advisor, which primarily 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.

## Item 15: Custody

SAFE does not accept or maintain custody of any Client accounts. 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.

## 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. 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.

## Item 17: Voting Client Securities

SAFE does not accept proxy-voting responsibility for the Client.

## 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.

## 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

Annette Raynor is the Chief Operating Officer of Investview Inc., the parent company of SAFE Management LLC.

### C. Performance Fee Calculations

SAFE does not 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](http://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.

- d) On November 1, 2017, Investview, Inc. 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. Investview, Inc is seeking injunctive relief to protect its business and damages of not less than \$300,000.
- e) On September 14<sup>th</sup>, 2018, Wealth Generators, LLC, a subsidiary of Investview, was issued an Order by the United States Commodity Futures Trading Commission ("CFTC") Docket 18-27 regarding the activities of Wealth Generators, LLC, one of its subsidiaries. Investview, Inc. proposed a negotiated resolution of the matter with the CFTC which was accepted. The order finds that Wealth Generators, through its automated trading convenience tools acted as a Commodity Trading Advisor without being registered as such, Wealth Generators, LLC without admitting or denying any of the allegations, will pay a fine of \$150,000, and will agree not to act as an unregistered Commodities Trading Advisor in the future. A copy of the CFTC Order dated September 14, 2018 can be found here: <https://www.cftc.gov/sites/default/files/2018-09/enfwealthgeneratorsorder091418.pdf>
- f) In January, 2018, Jim Westpfahl filed a wage claim against Wealth Generators, LLC (a company that was later acquired by Investview, Inc), in the United States District Court for the District of Utah, Central Division (Case No. 2:18-cv-00080, District Judge Dale A. Kimball and Magistrate Judge Evelyn J. Furse) in the amount of \$6,500 plus liquidated damages. Plaintiff is claiming unpaid overtime wages. Wealth Generators contends that Mr. Westpfahl 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, Plaintiff never provided the promised software pursuant to the parties' agreement. The Magistrate Judge ordered both parties to



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## Form ADV Part 2B Individual Disclosure Brochure



**Annette Raynor**

Effective: December 1<sup>st</sup>, 2018  
CRD: 512790

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 this Brochure Supplement or if you any questions about the contents of this Brochure Supplement or SAFE's Disclosure Brochure, please contact us at (732) 272-8852 or by email at [info@safeglobaladv.com](mailto:info@safeglobaladv.com).

Additional information about Annette Raynor is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2: Educational Background and Business Experience

Annette Raynor, IAR  
Year of Birth: 1964

### 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  
Channel Industry Advisor

### Employment History

#### Investview, Inc.

##### Chief Operations Officer, Corporate Secretary

April 1st, 2017 – present

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 1<sup>st</sup>, 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, is launching its advisory services in the fourth quarter of 2018 once all licensing and registrations have been completed.

#### 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 1<sup>st</sup>, 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 an owner 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.

Ms. Raynor may be contacted at:

Telephone: 732.889.4309

Email: [annette@SAFEadvglobal.com](mailto:annette@SAFEadvglobal.com)

## 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.

## 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 disciplinary events to disclose regarding Annette Raynor.

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](http://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, and WealthGen Global 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 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](http://sec.gov) – company filings – [Investview](#).

#### **Item 6 – Supervision**

Annette Raynor is the Manager, Compliance Officer, and Registered Investment Advisor Representative for SAFE Management. The treasurer of the firm is William Kosoff.

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.

**Item 7: Requirements for State Registered Advisors**

Annette Raynor does not have any additional information to disclose.



provide specific disclosures to the other side and both parties have complied. The Parties were ordered to meet and confer in a good faith effort to settle the matter on or before June 12, 2018. The parties were unable to settle the matter and as of June 19, 2018, we are preparing to proceed with filing appropriate counterclaims against Mr. Westpfahl.

### **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.