Part 2A of Form ADV

Firm Brochure

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This brochure provides information about the qualifications and business practices of Weatherstone Capital Management, a registered investment advisor with the Securities and Exchange Commission ("SEC"). Registration does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 303-741-2560 or via email directly to the Chief Compliance Officer at markr@transformwealth.com.

The information in this brochure has not been approved or verified by the SEC or by any state securities authority.

Additional information about Weatherstone Capital Management is also available on the SEC's web site at www.adviserinfo.sec.gov.

Website: www.weatherstonecm.com

March 25, 2022

Item 2 Material Changes

Our most recent annual updating amendment was filed on March 25, 2021. Since then, we have provided clarity regarding our practices calculating balances and advisory fees.

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury & Credit Solutions, LLC ("FTCS"). FTCS does not receive any compensation from such third-party institutions for serving our clients. Further information on this conflict of interest is available in Items 4, 5, and 10 of this Brochure.

Alternative investments were added to our investment model options when appropriate for clients.

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Item 4 Advisory Business

About the Firm

Weatherstone Capital Management was acquired by Transform Wealth, LLC ("Transform Wealth") on April 1, 2019.

Our Wealth Management Services include investment supervisory services to our clients. We began offering investment advice in 1991.

Weatherstone Capital Management ("Weatherstone") is a fee only, fiduciary advisor meaning we are required to act in your best interest and not place our own interests ahead of yours. Our commitment is to:

- Meet a professional and prudent standard of care when making investment recommendations;
- A duty of loyalty to never put our financial interests ahead of yours when making recommendations
- Follow policies and procedures designed to ensure that we give you advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

As a fiduciary, we have duties of care and of loyalty to you and are subject to obligations imposed on us by the federal and state securities laws. As a result, you have certain rights that you cannot waive or limit by contract. Nothing in our agreement with you should be interpreted as a limitation of our obligations under the federal and state securities laws or as a waiver of any unwaivable rights you possess.

Transform Wealth is managed by Nathan Kubik and David Kubik ("Transform Wealth Principals"), pursuant to a management agreement between C & K Management, LLC ("C&K") and Transform Wealth. The Transform Wealth Principals serve as leaders and officers of Transform Wealth and are responsible for the management, supervision and oversight of Transform Wealth. Michael Ball is the Managing Director of Weatherstone Capital Management.

FOCUS FINANCIAL PARTNERS, LLC

Transform Wealth is part of the Focus Financial Partners, LLC ("Focus LLC") partnership. Specifically, Transform Wealth is a wholly-owned subsidiary of Focus Operating, LLC ("Focus Operating"), which is a wholly-owned subsidiary of Focus LLC. Focus Financial Partners Inc. ("Focus Inc.") is the sole managing member of Focus LLC and is a public company traded on the NASDAQ Global Select Market. Focus Inc. owns approximately two-thirds of the economic interests in Focus LLC.

Focus Inc. has no single 25% or greater shareholder. Focus Inc. is the managing member of Focus LLC and has 100% of its governance rights. Accordingly, all governance is through the voting rights and Board at Focus Inc. Focus LLC also owns other registered investment advisers, broker-dealers, pension consultants, insurance firms, business managers and other financial service firms (the "Focus Partners"), most of which provide wealth management, benefit consulting and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs.

Investment Supervisory Services

We offer wealth management services, defined as providing continuous advice to a client or making investments for a client's individual needs. We do so through a limited power of attorney.

The assets are managed utilizing tactical and strategic asset allocation strategies. We provide these services as follows:

1) Through solicitors acting as independent contractors and not as employees of the applicant (whose accounts are referred to as external clients);

2) As a sub-advisor for various broker/dealers or registered investment advisory firms on their respective platforms (whose accounts are referred to as wrap fee accounts).

Direct client investment supervisory services are available through our parent company, Transform Wealth.

We participate in wrap fee programs by providing portfolio management services. How we manage our wrap fee programs may differ from how we manage our other programs. This is due to the difference in available investment selections, transaction fees and investment restrictions. We receive a portion of the wrap fee for our services.

Your Financial Advisor interviews you and collects data through an investment profile at the opening of the account as to your investment experience, liquidity requirements, and tolerance for risk, as well as for general financial information. The selected Investment Strategy or Strategies guided by your chosen Account Objectives then guides the placement and investments for your managed accounts.

You can instruct us to exclude certain securities on an individual basis or to impose reasonable restrictions on your accounts. You can also vote, pledge or hypothecate the securities in your account.

In order for us to provide ongoing services, you are responsible to advise Weatherstone in writing of any material changes in your financial status, modifications to your Account Objective, specific investment restrictions if applicable, special reports required if any, and material changes, such as a change of address, marital status, or any other relevant circumstance which may change how you wish your account to be managed. We cannot manage your account if you have no risk tolerance.

As of December 31, 2021, Transform Wealth and Weatherstone Capital Management's combined assets under management was $1,642,985,080 of which $1,642,660,790 was managed on a discretionary basis and $324,290 on a non-discretionary basis.

Focus Treasury Client Solutions

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury Client Solutions ("FTCS"), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. Please see Items 5 and 10 for a discussion of these services and other important information.

External Managers

When we allocate client assets to External Managers, the referring, client-facing adviser, is responsible for assessing the client's needs, communicating with the client, allocating (or recommending the allocation of) the client's assets and conducting due diligence and monitoring of the client's investments. The External Manager is responsible for managing certain of the client's assets that we allocate to them in a manner consistent with the manager's stated investment strategies and in accordance with the guidelines we provide.

Item 5 Fees and Compensation

Fees for Investment Supervisory Services

For our investment supervisory services, we collect an investment advisory fee (*Management Fee)* on a quarterly basis. Our fee schedule is listed below. Our fees are negotiable at our discretion.

Tactical Programs at Axos, Schwab & TD Ameritrade

$1,000,000 and under	1.95%
$1,000,001 and over	Negotiable

Bond & Equity Programs at Variable Annuities

$1,000,000 and under	2.00%
$1,000,001 and over	Negotiable

Strategic-Active & Tactical Foundation Programs at Axos, Schwab & TD Ameritrade

$1,000,000 and under	1.75%
$1,000,001 and over	Negotiable

Strategic-Passive Programs at Axos, Schwab & TD at Ameritrade

$1,000,000 and under	1.30%
$1,000,001 and over	Negotiable

Custom Programs at all custodians up to 2.50%

The above fees include and presume fees to Referring Advisors of 1.00%. Referring Advisors determine the rates of their fees, which will not exceed 1.00%.

Management fees are based on assets under management and are calculated as a percentage based on the value of all assets in the account, including cash, accrued interest and margin balances. Management Fees are due at the beginning of each calendar quarter, in advance, based on the account valuation on the last business day of the prior calendar quarter. An account that is opened mid-quarter is charged an initial Management Fee that includes a portion of the fee that is pro-rated for the number of days that the account is open in the first quarter. In addition, an account that is terminated mid-quarter is charged a Management Fee that is calculated on a pro-rated basis for the number of days the account is open in the quarter. If the termination occurs prior to the end of a billing period, fees paid in advance for the final billing period are considered to be earned through the effective date of the termination date. Any unearned portion of the fee paid in advance will be refunded to the client. If an account changes strategies mid-quarter and the fees for the new strategies, in aggregate are at a higher or lower fee than they were prior to the change, the adjustment to the billing will occur at the next quarter.

We do not recommend the use of margin by Clients but we may accommodate Client requests for use of margin by agreement between the Client and the Custodian. To the extent that a Client authorizes the use of margin, and margin is thereafter employed, the market value of the Client's account and corresponding fee payable by the Client to us will be increased. As a result, in addition to understanding and assuming the additional principal risks associated with the use of margin, Clients authorizing margin are advised of the potential conflict of interest whereby the Client's decision to employ margin will correspondingly increase the management fee payable to us. Accordingly, the decision to employ margin is left to the sole discretion of the Client. Clients employing margin are advised that the margin balance is not deducted when calculating the advisory fee.

Other Information about Advisory Fees

The fees charged can be higher or lower than fees charged in the industry for like services. Tactical investment strategies will typically be more expensive than strategic strategies due to the amount of time and infrastructure needed to frequently review and analyze investments, market conditions, and other risk factors, and then to update and trade investment portfolios as needed. Most of the Weatherstone strategies are evaluated weekly as well as at the beginning of each month. Changes are made as needed.

Exceptions or any other modifications to the fee schedule or minimum account sizes require our approval. In some instances, the primary custodian receives 12B-1 fees from investment companies. These fees offset client custodial fees and administrative costs. The client assets will be subject to additional fees and expenses as set forth in the prospectuses of those funds and variable annuities. The custodian of the assets will typically charge fees for custodial services or trading charges. These fees and expenses are ultimately borne by the client.

Clients Are Responsible for Fees Associated with Investing

Clients are responsible for the payment of all third party fees and expenses associated with investing, such as transaction charges and brokerage commissions to their broker/dealer or other service providers ("Financial Institutions") as well as any fees associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, retirement plan, trust fees, and all such applicable third party fees, deferred sales charges, odd lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.)

Third-party fees and expenses that clients are responsible for include the fees and expenses of third-party investment managers. Our fees are separate and distinct from the fees of third-party managers of separately managed accounts and fees and expenses charged to shareholders of ETFs or mutual funds. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fees. The fees charged by third-party managers of separately managed accounts are described in the Form ADV 2A brochure of that investment manager, and the fees and expenses charged by a mutual fund or ETF are described in the prospectus for the relevant fund. We do not receive any portion of these investment-related commissions and/or fees. Clients are encouraged to read each prospectus and securities offering document.

Portfolio additions may be in cash or securities provided that the Adviser reserves the right to liquidate any transferred securities, or decline to accept particular securities into a client's account. The Adviser may consult with its clients about the options and ramifications of transferring securities. However, clients are hereby advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (i.e. contingent deferred sales charge) and/or tax ramifications.

Focus Client Solutions

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury Client Solutions ("FTCS"). FTCS does not receive any compensation from such third-party institutions from serving our clients. Further information on this conflict of interest is available in Item 10 of this Brochure.

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

We do not charge any performance-based fees.

Item 7 Types of Clients

We provide investment advice to Individuals, Trusts, Estates, ERISA plans, Corporations and other business entities. We have a minimum account value of $25,000 and a program minimum of $12,500. At our discretion, we may accept smaller accounts and programs. Note, if your account is of a smaller size and the program you have selected invests in stocks, we may have to substitute other investments, such as mutual funds with similar objectives, due to the limitations of purchasing stocks with small dollar amounts.

We are a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA") with respect to investment management services and investment advice provided to ERISA plan clients, including plan participants. We are also a fiduciary under section 4975 of the Internal Revenue Code (the "IRC") with respect to investment management

services and investment advice provided to individual retirement accounts ("IRAs"), ERISA plans, and ERISA plan participants. As such, we are subject to specific duties and obligations under ERISA and the IRC that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice in which it has a conflict of interest, the fiduciary must either avoid or eliminate the conflict or rely upon a prohibited transaction exemption (a "PTE").

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

We offer the Investment Programs listed below. Each investment strategy has different objectives and ways of adjusting to changing investment climates. Most programs seek to manage risk based upon various measures that have been useful historically. While we expect that they will be useful in the future, market dynamics can and do change, and as a result it is not unusual to see the methods of risk measurement and analysis change over time as well. While risk management strategies can be quite effective when market changes are due to the impact of factors such as rising interest rates or economic cycles, they have little ability to protect against unexpected events such as terrorist attacks, major earthquakes, pandemics, etc. which are unpredictable. If we experience one of these types of situations, our goal is to determine if the financial markets have overreacted to the intermediate and long-term impact of the event and adjust the asset allocations accordingly.

Each investment strategy is best suited for investors who can hold the portfolio over a full market cycle of both a bull and bear market, because there are some market environments where programs may excel in comparison to their benchmarks, and others where they will lag behind. A full market cycle will typically give you some of each. You should review each program description to ensure that you are comfortable with the style of management and types of investments used by each program that you select under your investment advisory agreement. Please consult your financial advisor for a current listing of custodians on which the investment management programs are made available. The programs will often have different holdings and may trade differently from one custodian to another based upon factors such as investment options available and transaction fees, and trading cutoff times. Each program listed below has corresponding risks associated with the investment. The numbers following the description list the investment risks associated with each program and are explained in detail in the "Program Risks" section. Our program sheets also show performance for the programs. This data is given for performance at the primary custodian. We do not provide program sheets by individual custodians.

MANAGED HIGH YIELD - The Managed High Yield strategy is designed to generate income and growth through a portfolio primarily composed of non-investment grade corporate bond mutual funds. This program is designed to hold corporate bond mutual funds when various risk measurement models show that the funds have the potential to produce a higher return than a money market fund over an intermediate-term time frame. Mutual funds are used to provide greater diversification and liquidity than in a portfolio of individual bonds. During periods that show above average risk, the money is typically moved into a money market fund, or government bond fund. (2,5)

ASSET ENHANCEMENT - The goal of the program is to provide clients with the ability and opportunity to participate in various financial markets and to provide that participation with a reduced level of risk. The program is based on a foundation of dynamic asset allocation/modeling. The primary trading model is trend following in nature and based on technical indicators. Short-term, intermediate, and long-term trends are taken into consideration. A series of secondary models may be used when the primary model is less than 100% invested or in a defensive mode. The secondary models are designed to invest in bonds and equity income asset classes, as well as market index funds. The primary model is mostly mechanical and allows for some manager discretion. This component allows for flexibility during unusual events.

The secondary models are driven by a variety of factors, as well as by manager discretion. Equity, bond, domestic and international funds are all options to be used within this program. Position size will vary accordingly, with money market positions taken as a defensive stance. The two main goals of the program are capital preservation and consistent returns over time. (1-8)

CONSERVATIVE GROWTH - The Conservative Growth strategy is designed for investors who want growth and income from a portfolio composed primarily from bonds. The bond portion of the portfolio typically follows the Income Plus strategy (see description for further information). The goal of the investment strategy is to provide steady growth from the bond portion of the portfolio while enhancing returns from the equity portion of the portfolio. The equity portion of the portfolio is typically comprised of broad-based index funds, style specific funds, and sector specific funds. Some of the investments purchased in the equity portion of the portfolio may not typically be considered "conservative" by themselves, but the small weighting to such positions inside the portfolio in conjunction with risk management on the portfolio qualifies these investments to be held in a strategy designed for investors seeking moderate growth. (1-8)

INCOME PLUS - The Income Plus program is designed for income-oriented and moderate growth investors who wish to grow their assets through bonds and other equity income type investments. The portfolio will primarily concentrate its assets in the high yield corporate bond asset class when that sector is favorable, and will also use other bond asset classes and other income-oriented asset classes if the manager determines that they could have a favorable impact on the portfolio. During time periods when market conditions are determined to be generally unfavorable to bonds, then money market funds and inverse rising rate bond funds, and other defensive mutual funds designed to preserve purchasing power may be used. (2-8)

MANAGED INCOME – This program is designed for investors where income and preservation of principal are the primary investment goals. This portfolio is a “tactically” managed bond portfolio which invests 100% in bond exchange-traded and traditional mutual funds, primarily using high yield corporate bonds with the ability to use other bond categories such as U.S. Government bonds, investment grade corporate bonds, and international bond funds. Money market funds may also be utilized during defensive periods. (2-8)

STRATEGIC INCOME **-** The Strategic Income program is a tactically managed investment strategy designed to generate income and growth by investing in fixed income mutual funds and ETFs. The portfolio can invest across the full spectrum of fixed income securities without minimum or maximum weightings to any specific area within the fixed-income universe. During periods where the portfolio manager does not find attractive opportunities in fixed income securities, money market funds, other cash equivalent instruments and inverse rising rate bond funds may be used. (2-8)

TAX-AWARE FIXED INCOME - The Tax-Aware Fixed Income program is a tactically managed investment strategy designed to primarily utilize tax-free municipal bonds, but will also include taxable bonds in the portfolio when the portfolio manager determines that they have income or capital appreciation potential that is more attractive than current opportunities in tax-free municipal bonds. The portfolio may move from being fully invested in tax-free municipal bonds to being fully invested in taxable bonds. During periods where the portfolio manager does not find attractive opportunities in fixed income securities, money market funds, other cash equivalent instruments and inverse rising rate bond funds may be used. (2-8)

BALANCED GROWTH - The goal of the Balanced Growth program is to provide long-term growth of capital from a portfolio of stock and bond exchange-traded and traditional mutual funds that is diversified across several different tactical investment strategies where each directs a portion of the investment allocation, and determines the allocation between stocks, bonds and cash. The program is typically weighted 70% equities and 30% bonds. During periods when the various investment models indicate that there is little or no potential for gain over the intermediate-term in their respective categories, the asset allocation for that model will typically be moved to money markets or inverse positions to hedge long positions, or allocated to another model. (1-8)

DIVERSIFIED GROWTH - The Diversified Growth program is designed for investors seeking long-term growth of their capital over time. The program will typically be invested in stock exchange-traded and traditional mutual funds when conditions for a rising stock market exist. The program uses many of the same investment models as the Focused Growth Program, and adds additional diversification by including tactical mutual funds, which typically provide additional managers who have the ability to utilize innovative strategies that can adapt to changing market environments. During periods when the various investment models indicate that there is little or no potential for gain over the intermediate-term in their respective categories, the asset allocation for that model will typically be moved to money markets or inverse positions to hedge long positions, or allocated to another model. (1-8)

SECTOR ROTATION - The objective of the Sector Rotation Program is to tactically alter equity exposure across 10 industry sectors, based upon quantitative models. The primary quantitative econometric model evaluates factors such as the overall economy, fundamental variables that measure relative value of various equity markets versus bonds, risk metrics which are designed to capture the level of uncertainty in the markets, and technical factors such as momentum and market conviction metrics which are used to quantify the strength of market movements. When a sector model is on a “buy”, 10% of the portfolio will be allocated to that sector. On a “sell”, there is a 0% weighting to the sector and the money is allocated either to a money market fund or one of six bond asset classes. (2, 5, 8)

FOCUSED GROWTH - The Focused Growth Program is an investment strategy that typically invests in exchange-traded and traditional mutual funds that focus on specific investment sectors, styles, or international regions and countries. Selected funds for the asset allocation are chosen for their potential to outperform their long-term average rate of return over a short to intermediate-term time frame. Investments are chosen through a screening process that evaluates the general background environment for the financial markets, as well as through additional screening which looks at which areas of the market are most likely to perform well based upon historical profiles, cash flows, relative strength and a variety of other indicators. Additional screening may be done using various technical filters, as well as the judgment of the portfolio manager. The program will typically be fully invested in equities when market environments are deemed positive; however, during periods when the market environment is evaluated as being unfavorable, up to 100% of the portfolio may be allocated to money market funds or bond funds. The portfolio also has the ability to utilize ‘bear” funds that may rise in value during a market decline. (1-8)

STRATEGIC DIVIDEND – This strategy is an actively-managed strategic portfolio that seeks to achieve a balance between attractive absolute dividend yield and strong dividend growth rates supported by quality company fundamentals. The goal is to produce an attractive and rising current income stream and favorable risk-adjusted investment performance. The portfolio seeks to achieve these results by maintaining holdings concentrated in 25-40 companies with strong financial condition, strong relative earnings power, astute management, and a company culture of returning earnings to shareholders through dividends. (1,5,6,7,9)

HIGH QUALITY GROWTH **-** The High-Quality Growth program is an actively-managed strategic portfolio with a disciplined approach to investing in a concentrated portfolio of 20 to 30 mid-to-large capitalization stocks and international ADRs that are growing at above average rates and generate positive cash flow. The managers use a proprietary screening of company fundamentals for the equity decision process, and target stocks that they view as high quality that can be purchased at favorable price/earnings ratios based on fundamental valuation methods. They believe that holding a focused portfolio of quality stocks over a long-term horizon and not striving to match the sector weightings of a market index improves the probability of outperforming the market over time. (1,5,6,7,9)

INDEXED EQUITY – The objective of this program is to provide a broadly diversified allocation across the global equity markets. The majority of the allocation will be to domestic equity markets with a primary focus on large-cap securities, with smaller weightings to mid-cap and small-cap securities. Within the international allocation, the majority of the allocation will be to developed markets, with a smaller weighting to emerging markets. Positions are established using exchange-traded mutual funds (ETFs) that are designed to track various equity benchmarks. The portfolio is strategic in nature and will typically be rebalanced annually. (1,5,6,7)

INTERNATIONAL HIGH-QUALITY GROWTH **–** This strategy is an actively-managed strategic equity portfolio with a disciplined approach to investing in a concentrated portfolio of 20 to 30 mid-to-large capitalization Foreign ADRs, growing at above average rates and generating positive cash flow. The managers use a proprietary screening of company fundamentals for the equity decision process, and target stocks that they view as high quality that can be purchased at favorable price/earnings ratios based on fundamental valuation methods. They believe that holding a focused portfolio of quality stocks over a long-term horizon and not striving to match the sector weightings of a market index improves the probability of outperforming the market over time. (1,5,6,7,9)

TACTICAL MARKET INDEX – This is a tactically managed investment strategy designed to be fully invested in a mutual fund or exchange-traded fund that tracks large capitalization stocks such as the S&P 500, when the various investment models it uses are positive, and can move into cash or bonds when the investment models indicate that the market environment for stocks has moved into an environment of above-average risk. The risk measurement models used for this strategy focus primarily on measures of market action such as market participation across sectors and industry groups, market participation across countries, and the performance of stocks in relation to competing asset classes such as bonds, commodities and cash. The investment models are primarily mechanical, and incorporates stop-loss triggers designed to reduce drawdown risk, but manager discretion is allowed to make adjustments for unusual market conditions. (2,5)

CUSTOM PROGRAMS - Custom programs have the ability to utilize customized strategies and investment options that will not normally be used in a standard portfolio. In addition, custom portfolios may also be used on platforms not typically utilized because of their difficulty in managing larger number of accounts at a particular custodian. These accounts may trade in a delayed status (Tier II) compared to the regular strategies; generally, a one-day delay if operationally necessary. The ability to utilize a custom strategy requires the prior written approval of applicant.

CORE EQUITY - The Core Equity program focuses on opportunities within the U.S. domestic stock market, with the flexibility to invest in some areas in the international and emerging markets. Capital appreciation is the primary objective, with risk mitigation in periods of shorter-term volatility as a secondary objective. A combination of economic, market cycle, fundamental, and technical analysis helps to focus on specific investment styles and industries (sectors) to determine the appropriate asset allocation to those styles and sectors. In-house research determines positive trends in

profitability, debt, and management over the past several months and years. While seldom the case, cash positions may be higher than normal if market fundamentals do not warrant full exposure. Portfolios are allocated to the broad equity markets primarily through the use of 50-60 individual stocks and some periodic allocations to ETFs and mutual funds. (5,6,8)

DIVIDEND EQUITY - The Dividend Equity program focuses on growth and dividend income with an emphasis on companies that exhibit financial stability and historically lower volatility within the U.S. domestic stock market, with the flexibility to invest in some areas in the international and emerging markets. A combination of capital appreciation and dividend income is the primary objective, with risk mitigation in periods of shorter-term volatility as a secondary objective. A combination of economic, market cycle, fundamental, and technical analysis helps to focus on specific investment styles and industries (sectors) to determine the appropriate asset allocation to those styles and sectors, with a tilt toward value, large-cap, and more defensive oriented sectors and industries. In-house research determines positive trends in profitability, debt, and management over the past several months and years. While seldom the case, cash positions may be higher than normal if market fundamentals do not warrant full exposure. Portfolios are allocated to the broad equity markets primarily through the use of 40-50 individual stocks and some periodic allocations to ETFs and mutual funds. (5,6,8,9)

Mutual Funds and Exchange-Traded Funds (ETFs)
Mutual fund and ETF portfolios are comprised of individual equity and debt securities with their own unique company risks. Shareholders are liable for taxes on any capital gains, as these issuers are required by law to distribute capital gains to underlying shareholders.

Open-end mutual fund shares are calculated at the end of each business day where all shareholders receive the same closing price. ETF's generally trade intra-day where the net asset value (NAV) can fluctuate throughout the business day. As a result, ETF investors may receive different prices when trades are executed on the same day.

PROGRAM RISKS

The investment programs listed above may not be appropriate for all investors. There is no assurance that the Program's separate objectives will be achieved. Because most investment positions will be held less than one year, our investment strategies are best suited for tax-deferred accounts.

The items listed below are additional risks associated with our programs. We have numbered them and listed the numbers associated with each risk for the particular program after the program descriptions on the previous pages.

Investing in securities involves risk of loss that clients should be prepared to bear. It is important that clients understand these risks and they proactively address any concerns with their Advisor. Investment returns and the value of your investment will fluctuate and may lose money.

(1) Some of our Programs can invest in small/mid-cap and micro-cap stocks. The risks associated with investments in smaller companies include less experienced management, limited product lines and financial resources, shorter operating histories, less publicly available information, which may have more limited marketability and may be subject to more abrupt or erratic market movements than large-cap stocks. This may result in greater share price volatility.
(2) Some of our Programs can invest in fixed income securities. Fixed income securities are subject to credit risk, interest rate risk and liquidity risk. Generally, the value of fixed-income securities rises when prevailing interest rates fall and falls when interest rates rise. High-yield bonds, also known as "junk" bonds are subject to greater

credit risks and market risks, and are subject to adverse changes in general market conditions and in the industries in which the issuers are engaged, and to changes in the financial conditions of the issuers.

(3) Some Programs may also invest in "short" or "inverse" mutual funds which are designed to profit from declining securities prices, which involve certain risks that may include increased volatility due to the funds possible use of short sales of securities and derivatives such as options and futures. Short funds are typically used to offset the risk of "long" positions that may continue to be held in the portfolio.

(4) Some strategies will invest in leveraged mutual funds. The more a fund invests in leveraged instruments, the more the leverage will magnify any gains or losses on those investments. Leveraged mutual funds are typically used for short or intermediate-term trades and enable us to achieve market exposure without selling positions such as bonds or holdings that may move from being taxed as short-term capital gains to being taxed as long-term capital gains. With the exception of the U.S. Tactical Core program, we do not typically use leveraged funds in order to increase the stock market exposure to more than 100% invested. As an example, a 50% allocation in an index fund that is leveraged 2-1 would be expected to provide 100% of the return of an index. The impact of compounding often makes it difficult to achieve a perfect correlation with an index.

(5) Money market funds are not insured or guaranteed by the Federal Deposit Insurance Corporation (FDIC) or any other government agency.

(6) International funds that invest in the securities of foreign companies involve considerations and potential risks not typically associated with investment in domestic corporations. Funds allocated in an international/global/emerging markets investment could be subject to risks associated with changes in currency values, economic, political, social conditions and local regulatory environments.

(7) The securities markets of many of the emerging markets in which the strategies may invest are substantially smaller, less developed, less liquid and more volatile than the securities markets of the United States.

(8) Sector specific funds invest in a single sector mutual fund which involves greater risk and potential reward than investing in a more diversified mutual fund. Additional information regarding the risks associated with the investments that may be owned are more fully explained in the prospectus provided by the investment companies. Please read the prospectus for more information.

(9) Concentrated portfolios. The program will invest its assets in less than 50 positions, this will expose the portfolio to greater volatility and risk from company specific events than a broadly diversified portfolio would. Concentrated holdings may offer the potential for higher gain, but also offer the potential for higher loss.

Market Volatility

At various times in the past, volatile market conditions have had a dramatic effect on the value of private investments. In addition, terrorist attacks, other acts of violence or war, health epidemics or pandemics, natural hazards, and/or force majeure may affect the operations and profitability of a Fund's portfolio companies. Such events also could cause consumer confidence and spending to decrease or result in increased volatility in the U.S. and worldwide financial markets and economy. Any of these occurrences could have a significant impact on the operating results and revenues of a Fund's portfolio companies and, in turn, on the return of a Fund's investments.

Cybersecurity

The computer systems, networks and devices used by our firm and service providers to our firm and our clients to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt

operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; impediments to trading; the inability by or firm and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, and other financial institutions; and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

Limited Partnership / Private Real Estate Investment Trust Risks

Transform Wealth offers access to limited partnerships (public and private) and private real estate investment trusts to investors when such investments are consistent with client objectives, risk tolerance, and regulatory eligibility. Private investments are subject to various risks which are set forth in applicable offering documents for each investment. These risks include but are not limited to the risk of loss of principal; liquidity risk; lack of transparency or limitations on communications from the issuer or third parties regarding operations; challenges in obtaining or evaluating comparable pricing information or comparable information on which to evaluate the businesses; limited or no secondary market availability; risks associated with inconsistent dividends and/or distributions; and high internal and operating expenses. Private investments are subject to pricing and liquidity risks as they do not have regular daily pricing.

Real Estate Income Trust Risks

Investments in non-listed or non-traded real estate investment trusts (REITs) are subject to additional risks including but not limited to:

(1) Liquidity risk, as non-traded REITs generally cannot be sold until listed on an exchange or the trust's assets are liquidated. Early redemptions may be subject to limitations including notice requirements, termination of redemption provisions, and discounted redemption values.
(2) Non-traded REITs can include high upfront fees which are generally designed to cover offering and organizational costs. These early, high fees reduce the value of the principal invested and results in less return on investment. In addition, non-traded REITs can involve significant transaction costs including fees to acquire properties and asset management fees.
(3) Distributions from non-traded REITs, particularly initial distributions, may be derived from investment principal rather than operations. This practice reduces the value of the shares and reduces the cash available to the REIT to purchase real estate assets.
(4) Lack of available share price for non-traded REITs, which may limit or eliminate the ability to assess the value or performance of the investment for significant time periods.
(5) Conflicts of interest risks, including external managers that may receive significant transaction fees by the REIT for services that do not align with shareholder interests, such as fees based on the amount of property acquisitions and assets under management.

Credit Risk

Investments in credit funds are subject to the credit risk of the underlying instruments. Where such investments are below investment grade and speculative, the risks increase that economic downturns will negatively impact the ability to repurchase shares. Additional risks include lack of a secondary market, liquidity risk, redemption risk (including the risk of discounted returns upon early redemptions and other redemption risks associated with shares not listed on an exchange) and risks associated with distributions being funded from unlimited amounts of offering proceeds or borrowings (which reduces the amount of capital available to invest).

COVID Risk

The transmission of COVID and efforts to contain its spread have resulted in border closings and other travel restrictions and disruptions, market volatility, disruptions to business operations, supply chains and customer activity and quarantines. With widespread availability of vaccines, the U.S. Center for Disease Control and Prevention has revised its guidance, travel restrictions have started to lift, and businesses have reopened. However, the COVID pandemic continues to evolve and the extent to which our investment strategies will be impacted will depend on various factors beyond our control, including the extent and duration of the impact on economies around the world and on the global securities and commodities markets. Volatility in the U.S. and global financial markets caused by the COVID pandemic may continue and could impact our firm's investment strategies.

Although currently there has been no significant impact, the COVID outbreak, and future pandemics, could negatively affect vendors on which our firm and clients rely and could disrupt the ability of such vendors to perform essential tasks.

Item 9 Disciplinary Information

Neither the Firm nor any of our management persons have been involved in any event that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

Item 10 Other Financial Industry Activities and Affiliations

Focus Treasury Client Solutions

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions with the assistance of our affiliate, Focus Treasury & Client Solutions ("FTCS"), a wholly owned subsidiary of our parent company, Focus Financial Partners, LLC. These third-party financial institutions are banks and non-banks (the "Network Institutions") that offer credit and cash management solutions to our clients. Certain other unaffiliated third parties provide administrative and settlement services to facilitate FTCS's cash management solutions. FTCS acts as an intermediary to facilitate our clients' access to these credit and cash management solutions.

Neither we nor FTCS receives any compensation from the Network Institutions or any other third parties for providing credit or cash management solutions to our clients. For services provided by FTCS to clients of other Focus firms, FTCS receives a portion of the revenue earned by the Network Institutions, and such compensation to FTCS is also revenue for our common parent company, Focus Financial Partners, LLC. However, this compensation to FTCS does not come from credit or cash management solutions provided to any of our clients. The volume generated by our clients' transactions does benefit FTCS and Focus in attracting, retaining, and negotiating with Network Institutions. We mitigate this conflict by: (1) fully and fairly disclosing the material facts concerning the above arrangements to our clients, including in this Brochure; and (2) offering FTCS solutions to clients on a strictly nondiscretionary and fully disclosed basis, and not as part of any discretionary investment services. Additionally, we note that clients who use FTCS's services will receive product-specific disclosure from the Network Institutions and other unaffiliated third-party intermediaries that provide services to our clients.

We have an additional conflict of interest when we recommend FTCS to provide credit solutions to our clients because our interest in continuing to receive investment advisory fees from client accounts gives us a financial incentive to recommend that clients borrow money rather than liquidating some or all of the assets we manage.

Credit Solutions from FTCS

For FTCS credit solutions, the interest rate of the loan is ultimately determined by the lender, although in some circumstances FTCS may have the ability to influence the lender to lower the interest rate of the loan. The final rate may be higher or lower than the prevailing market rate. We can offer no assurances that the rates offered to you by the lender are the lowest possible rates available in the marketplace.

Clients retain the right to pledge assets in accounts generally, subject to any restrictions imposed by clients' custodians. While the FTCS program facilitates secured loans through Network Institutions, clients are free instead to work directly with institutions outside the FTCS program. Because of the limited number of participating Network Institutions, clients may be limited in their ability to obtain as favorable loan terms as if the client were to work directly with other banks to negotiate loan terms or obtain other financial arrangements.

Clients should also understand that pledging assets in an account to secure a loan involves additional risk and restrictions. A Network Institution has the authority to liquidate all or part of the pledged securities at any time, without prior notice to clients and without their consent, to maintain required collateral levels. The Network Institution also has the right to call client loans and require repayment within a short period of time; if the client cannot repay the loan within the specified time period, the Network Institution will have the right to force the sale of pledged assets to repay those loans. Selling assets to maintain collateral levels or calling loans may result in asset sales and realized losses in a declining market, leading to the permanent loss of capital. These sales also may have adverse tax consequences. Interest payments and any other loan-related fees are borne by clients and are in addition to the advisory fees that clients pay us for managing assets, including assets that are pledged as collateral. The returns on pledged assets may be less than the account fees and interest paid by the account. Clients should consider carefully and skeptically any recommendation to pursue a more aggressive investment strategy in order to support the cost of borrowing, particularly the risks and costs of any such strategy. More generally, before borrowing funds, a client should carefully review the loan agreement, loan application, and other forms and determine that the loan is consistent with the client's long-term financial goals and presents risks consistent with the client's financial circumstances and risk tolerance.

Cash Management Solutions from FTCS

For FTCS cash management solutions, as stated above, certain third-party intermediaries provide administrative and settlement services in connection with the program. Those intermediaries each charge a fixed basis point fee on total deposits in the program. Before any interest is paid into client accounts, the Network Institutions and certain unaffiliated third-party service providers take their fees out, and the net interest is then credited to clients' accounts. Engaging FTCS, the Network Institutions, and these other intermediaries to provide cash management solutions does not alter the manner in which we treat cash for billing purposes.

Clients should understand that in rare circumstances, depending on interest rates and other economic and market factors, the yields on cash management solutions could be lower than the aggregate fees and expenses charged by the Network Institutions, the intermediaries referenced above, and us. Consequently, in these rare circumstances, a client could experience a negative overall investment return with respect to those cash investments. Nonetheless, it might still be reasonable for a client to participate in the FTCS cash management program if the client prefers to hold cash at the Network Institutions rather than at other financial institutions (e.g., to take advantage of FDIC insurance).

We do not believe the Focus Partnership presents a conflict of interest with our clients. We do not have a business relationship with other Focus Partners that is material to its advisory business or to its clients.

Recommendation of Other Advisers

Weatherstone Capital Management manages some of the tactical programs with in-house staff while other programs are managed by sub-advisors who provide us with trading instructions. In the event that we use sub-advisors, they are paid for their services. We receive more income for programs managed in-house and it can be considered a conflict of interest to recommend our own investment programs over those of a sub-advisor.

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

Our employees can buy or sell for their own accounts the same securities recommended to you. Employees seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you and we monitor their personal trading.

Employees are aware of the rules regarding material non-public information and insider trading. Employees can also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We do not enter into principal transactions, in which we or our employees buy or sell a security directly to or from a client.

We have a Code of Ethics in place in accordance with applicable securities laws that sets forth the standards of conduct expected of its employees. Written policies and procedures are reasonably designed to prevent certain unlawful practices. Employees are required to:

- Place the interests of clients ahead of their personal interests.
- Owe a duty of loyalty to clients and always act in an ethical manner when interacting with clients, prospects and vendors.
- Conduct all personal security transactions in full compliance with the Code of Ethics.
- Avoid taking inappropriate advantage of their position.
- Use independent, sound judgment when making investment recommendations and engaging in professional activities.

Clients and prospective clients can contact us to request a copy of our Code of Ethics.

Item 12 Brokerage Practices

When recommending custodians to our Clients, we consider the availability of investment products, the cost to Clients for custodial and trading services, and the ease of doing business.

We typically recommend Axos Advisor Services (Axos) for our Clients' custodial needs when they wish to use multiple strategies in a single account. They have no minimum commission or trading fee and can trade in fractional shares. If we do use a mutual fund that pays a 12b-1 fee to Axos, they use up to 25 basis points of the shareholder servicing fees they receive from the mutual fund used in the account to offset the custodial service fee charged to your account. This offset is only available to customers at Axos, and not to our Clients with other custodians.

We also recommend Charles Schwab and TD Ameritrade Institutional, a division of Charles Schwab & Co., Inc. Member FINRA/SIPC/NFA as a custodian. We typically recommend Charles Schwab or TD Ameritrade as custodian for smaller accounts, and for accounts that do not mind having a separate account for each investment strategy, and because of their customer service, technology, trade execution and low expenses to clients. They have relatively low or no transaction fees, low custodial fees, provide many client services free of charge, and provide and document data on best execution for our

review and monitoring. The pricing and execution a Client will receive will vary between Charles Schwab, TD Ameritrade and Axos. There is no guarantee that one will offer better execution than the other will. Choosing one over the other could cost you more money or could result in less favorable execution.

At Axos, we may opt to use liquidity providers, who assist us in achieving better execution for trades than what we believe we could have executed on our own. Those liquidity providers are compensated for their assistance. We opt to use their services only when it seems reasonable that the overall execution quality will benefit.

We receive referrals from representatives associated with broker-dealers. These broker-dealers may place limitations on the custodial platforms they permit, and have an incentive to recommend a particular custodian because of additional compensation or reduced clearing fees they may pay for other services.

We do not receive any research, products or services from broker/dealers or third parties, other than what is necessary for the execution of Client securities transactions. We do not receive any "formal soft dollar" benefits.

We do not offer directed brokerage services.

Aggregated Trading

We engage in aggregated/block trading so as to avoid the time and expense of simultaneously entering similar orders for many individual client accounts that are managed similarly at the same custodian, with a goal to receive the same execution price and minimize any difference in performance.

Weatherstone has established procedures to comply with its obligations associated with aggregated/block orders.

Other Information about Trading

We place trades using your selected custodian, and in some instances, we send our trade instructions to platform sponsors, who in turn execute the trades. Because of the multiple platforms through which we are directing trades, not all trades will be done at the same time. We anticipate that they will generally be done within one business day of each other, but cannot guarantee that result. This means that you may receive better or worse pricing than other individuals in the same program.

Trade Error Policy

On rare occasions, trade errors can occur. To resolve trade errors, we will place a correcting trade with the client's broker/dealer. At TD Ameritrade we are responsible for reimbursing clients for all losses due to trade errors made by our firm in client accounts. TD Ameritrade will donate any gains to a charity of their choice.

At Schwab, we are responsible for any losses exceeding $100 when it is determined it is responsible for the error. To minimize administrative costs, Schwab will absorb any losses less than $100. When investment gains result from a trade error, the gain will be retained by the Client unless it is determined to be not permissible or the Client elects not to accept the gain for tax purposes or other reasons. Any gains not retained by Clients are donated by Schwab to a charity of its choice.

At Axos, we are responsible for reimbursing clients for all losses due to trade errors made by us in client accounts.

Item 13 Review of Accounts

Accounts are under the supervision by a review team responsible for verifying that each strategy has been reviewed after rebalances or model trades. Model review is to consist of an audit of sample of client accounts or models after adjustments are made to asset allocations for the purpose of determining if transactions were processed properly. Because of the nature of the managed account strategies, all accounts in those strategies are under regular review. Accounts in custom programs are reviewed at least semi-annually.

We provide optional quarterly performance statements to some clients. Clients with these types of accounts may view their account information and run reports by going to the client section of our website at www.weatherstonecm.com.

Item 14 Client Referrals and Other Compensation

We have arrangements in place with certain third parties whereby we compensate them for client referrals by paying them a percentage of the investment advisory fees we receive from the solicited clients. Specifically, we have entered into solicitation agreements with 19 solicitors. Solicitation arrangements inherently give rise to potential conflicts of interest because the solicitor is receiving an economic benefit for the recommendation of advisory services. Rule 206(4)-3 of the Advisers Act (the "Cash Solicitation Rule") addresses this conflict of interest by requiring advisers who pay third party solicitors to enter into agreements requiring the solicitors to make certain disclosures to solicited potential clients. In accordance with the Cash Solicitation Rule, we require third party solicitors who introduce potential clients to us to provide the potential client with a copy of this disclosure brochure and a copy of the solicitors' disclosure statement which explains that the solicitor will be compensated for the referral and contains the terms and conditions of the solicitation agreement, including the compensation the solicitor is to receive.

Weatherstone's and Transform Wealth's parent company is Focus Financial Partners, LLC ("Focus"). From time to time, Focus holds partnership meetings and other industry and best-practices conferences, which typically include Transform Wealth, other Focus firms and external attendees. These meetings are first and foremost intended to provide training or education to personnel of Focus firms, including Transform Wealth. However, the meetings do provide sponsorship opportunities for asset managers, asset custodians, vendors and other third-party service providers. Sponsorship fees allow these companies to advertise their products and services to Focus firms, including Transform Wealth. Although the participation of Focus firm personnel in these meetings is not preconditioned on the achievement of a sales target for any conference sponsor, this practice could nonetheless be deemed a conflict as the marketing and education activities conducted, and the access granted, at such meetings and conferences could cause Transform Wealth to focus on those conference sponsors in the course of its duties. Focus attempts to mitigate any such conflict by allocating the sponsorship fees only to defraying the cost of the meeting or future meetings and not as revenue for itself or any affiliate, including Transform Wealth. Conference sponsorship fees are not dependent on assets placed with any specific provider or revenue generated by such asset placement.

During the past year, Charles Schwab & Co., Inc. provided conference sponsorship to our parent company, Focus LLC. You can access a more recently updated list of conference sponsors on Focus' website through the following link: https://focusfinancialpartners.com/conference-sponsors/.

Item 15 Custody

We typically deduct advisory fees from client accounts held at an independent custodian, as allowed under the safe harbor provisions of the SEC's Custody rule. The qualified custodian of client assets sends account statements directly to Clients. You will receive account statements from the broker-dealer or other qualified custodian. You should carefully

review those statements because they are the independent custodian who holds your investments. An independent custodian is an important safeguard to protect your account.

We provide some of our clients with portfolio reports. If you receive these types of reports, we urge you to compare their contents with the statements you receive from your custodian. In the event of a valuation discrepancy, the custodial statement will serve as the official statement.

Item 16 Investment Discretion

We ask you to provide us with investment discretion with respect to securities to be bought and sold and amount of securities to be bought and sold. You grant us this authority by signing a discretionary asset management agreement.

We use this investment discretion to be able to adjust our asset allocation across our investment models as market conditions and investment opportunities change. This allows us to make the adjustment for individual client accounts, and as a group with others invested in the same strategy. We may also use this discretion to select different sub-advisers to use to help us manage our programs.

Item 17 Voting Client Securities

We do not vote proxies on behalf of our Clients. Clients will receive proxies or other solicitations directly from their custodian and can contact the custodian with questions about any particular solicitation. Also, we do not participate in any class action lawsuits on behalf of our Clients.

Item 18 Financial Information

We do not require or solicit prepayment of investment advisory fees of more than $1,200, six months or more in advance. We are unaware of any financial condition that is likely to impair our ability to meet our contractual commitments to our clients and we have not been the subject of a bankruptcy petition.

FACTS

WHAT DOES TRANSFORM WEALTH DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number
- Income
- Assets and account balances
- Investment experience and account transactions
- Wire transfer instructions

When you are *no longer* our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Transform Wealth chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Transform Wealth share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?

Call Mark Riley, Chief Compliance Officer at 720-509-3558 or go to our website at www.transformwealth.com

Who we are	
Who is providing this notice?	Transform Wealth
What we do	
How does Transform Wealth protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Transform Wealth collect my personal information?	We collect your personal information, for example, when you: ■ Open an account or give us your income information ■ Tell us about your portfolio or deposit money ■ Enter into an investment advisory contract ■ Instruct us to send money We also collect your personal information from others, such as affiliates or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only ■ Sharing for affiliates' everyday business purposes—information about your creditworthiness ■ Affiliates from using your information to market to you ■ Sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. ■ *Our affiliates include Focus Operating, LLC and Focus Treasury Client Solutions, LLC.*
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. ■ *Transform Wealth does not share with nonaffiliates so they can market to you.*
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ■ *Transform Wealth does not jointly market.*
Other important information	

Brochure Supplement

Part 2B of Form ADV

March 25, 2022

Item 1: Educational Background and Business Experience

Nathan J. Kubik was born in 1976. He holds a BS in Finance and Economics from the University of Illinois and an MBA from the University of Denver. Nathan's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Chief Executive Officer
Employment Dates:	August 2011 to Present
Firm Name:	**Northland Securities**
Job Title:	VP Investment Executive
Employment Dates:	January 2012 to December 31, 2014
Firm Name:	**PSI**
Job Title:	Director
Employment Dates:	July 2008 to August 2011
Firm Name:	**Claymore Securities, Inc.**
Job Title:	Regional Vice President
Employment Dates:	July 2005 to December 2005

Item 2: Disciplinary Information

Nathan does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Nathan does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Nathan does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Nathan is directly supervised by Mark Riley, Chief Compliance Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Nathan Kubik that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Nathan Kubik is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 3081407

Item 1: Educational Background and Business Experience

David Kubik was born in 1978. He holds a BBA in Finance from Southern Methodist University in Dallas, Texas. David's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	President
Employment Dates:	August 2011 to Present
Firm Name:	**Northland Securities**
Job Title:	Vice President Investment Executive
Employment Dates:	January 2012 to December 2014
Firm Name:	**BOSC, Incorporated**
Job Title:	VP-Institutional Wealth Management
Employment Dates:	March 2009 to September 2011
Firm Name:	**Colorado State Bank and Trust**
Job Title:	VP-Institutional Wealth Management
Employment Dates:	March 2009 to September 2011
Firm Name:	**Alliance Bernstein Investments**
Job Title:	VP-Regional Manager
Employment Dates:	July 2007 to November 2008

Item 2: Disciplinary Information

David does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

David does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

David does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

David is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about David Kubik that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about David Kubik is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 4388810

Item 1: Educational Background and Business Experience

William Van Keulen, CFP® was born in 1967. He holds a BS in Accounting from the University of Minnesota and an MBA from Loyola University in New Orleans, Louisiana. Additionally, he holds the CFP® & CPA/PFS designations. Bill's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Executive Vice President & Senior Financial Advisor
Employment Dates:	October 2011 to Present
Firm Name:	**Carnick & Company, Inc.**
Job Title:	Advisory Representative
Employment Dates:	September 2002 to October 2011

Item 2: Disciplinary Information

Bill does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Interests

Bill does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Bill does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Bill is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Bill Van Keulen that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about William Van Keulen is available on the SEC's website at:

www.AdviserInfo.sec.gov. CRD # 4611622

Item 1: Educational Background and Business Experience

Michael Ball, CFP® was born in 1967. He holds an A.A. degree from Brigham Young University - Idaho and a B.S. in Corporate Finance with a Minor in Accounting from Utah State University. He also holds the CFP® designation. Michael's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Managing Director
Employment Dates:	April 2019 to Present
Firm Name:	**Weatherstone Capital Management**
Job Title:	Portfolio Manager
Employment Dates:	December 1990 to March 2019
Firm Name:	**Centaurus Financial, Inc.**
Job Title:	Financial Advisor
Employment Dates:	November 2001 to August 2009
Firm Name:	**United Pacific Securities/Sentra Securities**
Job Title:	Financial Advisor
Employment Dates:	July 1996 to November 2001
Firm Name:	**Investment Centers of America**
Job Title:	Financial Advisor
Dates:	April 1992 to July 1996

Item 2: Disciplinary Information

Michael does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Michael does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Michael is eligible for additional compensation from our indirect parent company, Focus Financial Partners, LLC, depending on annual revenues and/or earnings. This potential for increased compensation provides an incentive for Michael to encourage you to maintain and even increase the size of your investment account with us.

Item 5: Supervision

Michael is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Michael Ball that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Michael Ball is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 1915309

Item 1: Educational Background and Business Experience

Robert L. Campbell, CFP® was born in 1951. He holds a BS in Accounting from the University of Oklahoma. He also holds the CFP designation, and has held the CPA designation in the past. Robert's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Senior Financial Advisor
Employment Dates:	July 2015 to Present
Firm Name:	**Valued Investment Partners, LLC**
Job Title:	Co-Founder & Representative
Employment Dates:	January 2006 to June 2015
Firm Name:	**Campbell Financial Group**
Job Title:	President
Employment Dates:	January 1992 to January 2006
Firm Name:	**Windsor Financial Group**
Job Title:	Sr. Vice President
Employment Dates:	January 1988 to December 1991

Item 2: Disciplinary Information

Robert does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Robert does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Robert does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Robert is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Robert Campbell that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Robert Campbell is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 1133176

Item 1: Educational Background and Business Experience

Craig Evans Carnick, CFP® was born in 1946. He is a 1985 graduate of the College for Financial Planning in Denver, Colorado. Craig's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Chairman Emeritus and Managing Director
Employment Dates:	October 2011 to Present
Firm Name:	**Carnick & Company, Incorporated**
Job Title:	President
Employment Dates:	January 1984 to October, 2011

Item 2: Disciplinary Information

Craig does not have any legal or disciplinary events that would Be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Craig does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Craig does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Craig is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Craig Carnick that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Craig Carnick is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 702111

Item 1: Educational Background and Business Experience

Sandra Chapman, CFA was born in 1973. She holds a B.S. in Finance from the University of Colorado at Denver. She also holds the CFA designation. Sandra's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Senior Financial Advisor
Employment Dates:	November 2019 to Present
Firm Name:	**CoBiz Wealth/BOK Financial Private Wealth, Inc.**
Job Title:	SVP, Senior Portfolio Manager
Employment Dates:	March 2016 to November 2019
Firm Name:	**Charles Schwab**
Job Title:	Portfolio Consultant
Employment Dates:	January 2013 to March 2016
Firm Name:	**Self Employed**
Job Title:	Option Trader
Employment Dates:	January 2004 to January 2013
Firm Name:	**Charles Schwab**
Job Title:	Portfolio Consultant
Employment Dates:	February 1996 to January 2004
Firm Name:	**Oppenheimer & Co. Inc**
Job Title:	Dealer Services/Top Producers
Employment Dates:	May 1994 to February 1996

Item 2: Disciplinary Information

Sandra does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of her ability to provide investment advice.

Item 3: Other Business Activities

Sandra does not have any investment-related activities outside of her employment with Transform Wealth.

Item 4: Additional Compensation

Sandra does not receive any additional compensation related to the provision of investment advisory services.

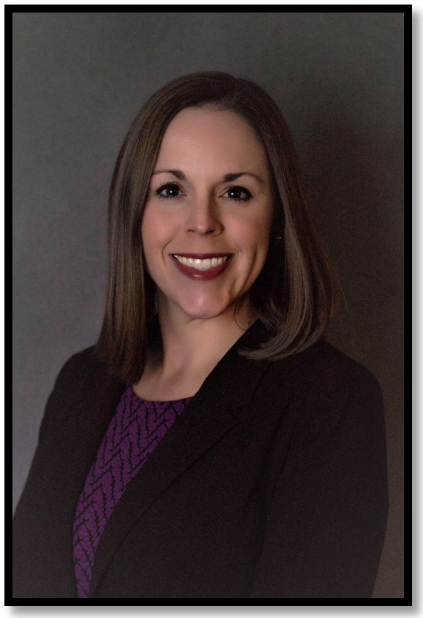
Item 5: Supervision

Sandra is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Sandra Chapman that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Sandra Chapman is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 2470804

Item 1: Educational Background and Business Experience

Clarissa Hobson, CFP® was born in 1979. She holds a degree from the University of the South in Sewanee, Tennessee. She also holds the CFP® designation. Clarissa's business experience is as follows:



Firm Name:	**Transform Wealth, LLC**
Job Title:	Director of Financial Planning
Employment Dates:	October 2011 to Present
Firm Name:	**Carnick & Company, Inc.**
Job Title:	Advisory Representative
Employment Dates:	January 2010 to October 2011
Firm Name:	**Princor Financial Services, Corp.**
Job Title:	Financial Advisor
Employment Dates:	March 2006 to December 2009

Item 2: Disciplinary Information

Clarissa does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of her ability to provide investment advice.

Item 3: Other Business Activities

Clarissa does not have any investment-related activities outside of her employment with Transform Wealth.

Item 4: Additional Compensation

Clarissa does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Clarissa is directly supervised by Nathan Kubik, Chief Executive Officer of the firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Clarissa Hobson that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Clarissa Hobson is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 5121067

Item 1: Educational Background and Business Experience

Richard Leader, CFA® was born in 1948. He holds an undergraduate degree from Wake Forest University and an MBA from Vanderbilt. He earned the CFA designation in 1981. Richard's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Managing Director
Employment Dates:	September 2017 to Present
Firm Name:	**First Houston Capital**
Job Title:	President, Chief Investment Officer, & Chief Compliance Officer
Employment Dates:	June 2006 to August 2017
Firm Name:	**Burnham Securities, Inc.**
Job Title:	Managing Director Employment
Employment Dates:	April 1999 to June 2006
Firm Name:	**Oppenheimer & Company**
Job Title:	Managing Director Employment
Employment Dates:	January 1991 to April 1999

Item 2: Disciplinary Information

Richard does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Richard does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Richard does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Richard is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Richard Leader that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Richard Leader is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 730325

Item 1: Educational Background and Business Experience

Michael James Meador was born in 1989. He is a 2012 graduate from Colorado State University with a Bachelor of Science, Business Administration with concentration in Finance. Michael's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Financial Advisor & Director of Strategic Initiatives
Employment Dates:	April 2017 to present
Firm Name:	**Transform Wealth, LLC**
Job Title:	Research Analyst
Employment Dates:	December 2016 to April 2017
Firm Name:	**Bernstein Global Wealth**
Job Title:	Senior Private Client Associate
Employment Dates:	September 2013 to November 2016
Firm Name:	**Provident Funding**
Job Title:	Account Manager
Employment Dates:	June 2012 to September 2013

Item 2: Disciplinary Information

Michael does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Michael does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Michael does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Michael is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Michael Meador that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Michael Meador is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 5882774

Item 1: Educational Background and Business Experience

John A. McDonald was born in 1967. He holds a BBA in Finance/Entrepreneurship from Baylor University and an MBA in Finance from the University of St. Thomas. John's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Senior Financial Advisor
Employment Dates:	June 2021 to Present
Firm Name:	**Comerica Wealth Management**
Job Title:	Senior Investment Strategist
Employment Dates:	August 2015 to June 2021
Firm Name:	**Patriot Wealth Management**
Job Title:	Portfolio Manager
Employment Dates:	February 2014 to March 2015
Firm Name:	**Capital One Asset Management**
Job Title:	Director, Senior Portfolio Manager
Employment Dates:	October 2009 to February 2014

Item 2: Disciplinary Information

John does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

John does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

John does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

John is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about John McDonald that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about John McDonald is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD #4476726

Item 1: Educational Background and Business Experience

Linda K. Penfold was born in 1957. She holds a B.A. in Business Administration and B.S. in History from Western Colorado University. She is also a Chartered Retirement Planning Counselor. Linda's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Director, Client Services
Employment Dates:	April 2019 to Present
Firm Name:	**Weatherstone Capital Management**
Job Title:	Director, Client Services
Employment Dates:	2000 to March 2019
Firm Name:	**MarketGuide, Inve$tware, WorldVest, and National Association of Investors**
Job Title:	Consultant, Independent Product Development for Financial Applications
Employment Dates:	1997 to 2000
Firm Name:	**Standard & Poor's Compustat**
Job Title:	Director, Data and Custom Investment Products
Employment Dates:	1980 to 1996

Item 2: Disciplinary Information

Linda does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of her ability to provide investment advice.

Item 3: Other Business Activities

Linda does not have any investment-related activities outside of her employment with Transform Wealth.

Item 4: Additional Compensation

Linda does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Linda is directly supervised by Michael Ball, Managing Director. Mr. Ball may be reached at (303) 452-4374. This Brochure Supplement provides information about Linda Penfold that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Linda Penfold is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 4196894

Item 1: Educational Background and Business Experience

Gordan C. Post, CFP® was born in 1965. He holds a B.S. in Finance from The Pennsylvania State University and an MBA in Finance and Investment Management from the University of Colorado, Denver. He also holds the CFP® designation. Gordan's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Senior Financial Advisor
Employment Dates:	November 2019 to Present
Firm Name:	**BOK Financial Private Wealth, Inc.**
Job Title:	SVP, Senior Wealth Advisor
Employment Dates:	July 2019 to November 2019
Firm Name:	**CoBiz Wealth**
Job Title:	SVP, Senior Portfolio Manager
Employment Dates:	July 2011 to June 2019
Firm Name:	**Colorado Business Bank**
Job Title:	SVP, Sr. Trust Portfolio Manager
Employment Dates:	January 2007 to June 2011
Firm Name:	**ANB Bank**
Job Title:	SVP, Trust Investments
Employment Dates:	March 1998 to January 2007

Item 2: Disciplinary Information

Gordan does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Gordan does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Gordan does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Gordan is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Gordan C. Post that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Gordan Post is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 2002825

Item 1: Educational Background and Business Experience

Kenneth P. Tillman, CFP® was born in 1962. He is a 1987 graduate from the University of South Florida in Tampa, Florida. He also holds the CFP designation. Ken's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Financial Advisor
Employment Dates:	July 2015 to Present
Firm Name:	**Valued Investment Partners, LLC**
Job Title:	Client Services Manager
Employment Dates:	January 2008 to June 2015
Firm Name:	**Cherry Hills Investment Advisors**
Job Title:	Associate
Employment Dates:	January 2007 to December 2007

Item 2: Disciplinary Information

Ken does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Ken does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Ken does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Ken is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Kenneth Tillman that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Kenneth Tillman is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD # 6192684

Item 1: Educational Background and Business Experience

Yiwen Chen was born in 1989. He holds a BBA in Finance from the University of Colorado at Boulder. He earned the CFA designation in 2016. Yiwen's business experience is as follows:

Firm Name:	**Transform Wealth, LLC**
Job Title:	Director of Trading
Employment Dates:	April 2020 to Present

Firm Name:	**BSW Wealth Partners**
Job Title:	Director of Trading, Portfolio Manager
Employment Dates:	January 2012 to August 2019

Item 2: Disciplinary Information

Yiwen does not have any legal or disciplinary events that would be material to a client's or prospective client's evaluation of his ability to provide investment advice.

Item 3: Other Business Activities

Yiwen does not have any investment-related activities outside of his employment with Transform Wealth.

Item 4: Additional Compensation

Yiwen does not receive any additional compensation related to the provision of investment advisory services.

Item 5: Supervision

Yiwen is directly supervised by Nathan Kubik, Chief Executive Officer of the Firm. He may be reached at (303) 741-2560. This Brochure Supplement provides information about Yiwen Chen that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Yiwen Chen is available on the SEC's website at:

www.AdviserInfo.sec.gov CRD #6592078

Professional Designation Disclosures

CFA – Certified Financial Analyst
Issued by: CFA Institute

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's (or equivalent) degree or be in the final year of a bachelor's degree program, and
- Four years of professional work experience, OR
- A combination of professional work and university experience that totals at least four years.
- 2 professional references

Examination Type: CFA Exams Level I, II and III, each with a suggested study time of 300 hours.

Content: Ethical and Professional Standards, Quantitative Methods, Economics, Financial Reporting and Analysis, Corporate Finance, Equity Investments, Fixed Income Investments, Derivatives, Alternative Investments, Portfolio Management and Wealth Planning.

Continuing Education/Experience Requirements: Recommended 20 hours, including 2 hours in the content areas of Standard, Ethics and Regulations (SER) each calendar year.

CAIA – CHARTERED ALTERNATIVE INVESTMENT ANALYST
Issued by: CAIA Association

Prerequisites/Experience Required: Candidate must meet the following requirements:

- 1 year of professional experience
- 2 professional references

Educational Requirements: N/A

Examination Type: Two levels of qualifying exams offered twice a year, each with a suggested study time of 200 hours.

Content: Professional Standards & Ethics, Introduction to Alternative Investments, Real Assets including Commodities, Hedge Funds, Private Equity and Structured Products.

Continuing Education Requirements: N/A

CFP® - CERTIFIED FINANCIAL PLANNER™
Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements:

- A bachelor's degree (or higher) from an accredited college or university
- Most candidates select the Standard Experience Path which includes 3 years of full-time personal financial planning experience, engaged in one or more than five activities: Personal Delivery, Supervision of Delivery, Client Support, Teaching or Internships. Additionally, this path requires candidates to complete one or more of the 7 primary elements of financial planning.

Educational Requirements: Candidate must complete the Capstone (includes the creation of a mock financial plan), in addition to completing a CFP-board registered program or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP® Certification Examination with a suggested study time of 200 hours.

Content: General Principles of Financial Planning, Education Planning, Risk Management and Insurance Planning, Investment Planning, Tax Planning, Retirement Savings and Income Planning, Estate Planning, Professional Conduct and Regulation and Financial Plan Development (Capstone Course).

Continuing Education Requirements: 30 hours every 2 years.

CIMA® - Certified Investment Management Analyst®
Issued by: Investments & Wealth Institute

Prerequisites/Experience Required: 3 years of verified work experience in financial services to be earned before certification.

Examination Type: CIMA Certification Examination with a suggested study time of 150 hours.

Content: Fundamentals: Statistics and Methods, Applied Finance and Economics and Global Capital Markets; Investments: Vehicles, Equity, Fixed Income, Alternative Investments, Options/Futures and Real Assets; Portfolio Theory and Behavioral Finance: Portfolio Theories and Models, Behavioral Finance Theory, Investment Philosophies and Styles and Tools and Strategies; Risk and Return: Attributes of Risk, Risk Measurements, Performance Management and Attribution; Portfolio Construction and Consulting Process: Ethics and Investments & Wealth Institute Code of Professional Responsibility, Client Discovery, Investment Policy, Portfolio Construction, Manager Search and Selection and Portfolio Review and Revisions.

Continuing Education Requirements: Complete and report a minimum of 40 hours every two years of continuing education (CE) credit, including two ethics hours and one hour of Tax or Regulation.

CPWA® -Certified Private Wealth Advisor®
Issued by: Investments & Wealth Institute

Prerequisites/Experience Required: 5 years of financial services experience at time of application. Complete the education requirement through a registered education program.

Examination Type: CPWA Certification Examination with a suggested study time of 100-250 hours.

Content: Ethics, Behavioral Finance, Family Dynamics, Tax Planning, Portfolio Management, Risk Management and Asset Protection, Charitable Giving and Endowments, Estate Issues and Wealth Transfer, Planning for Executives, Planning for Closely Held Business Owners and Retirement Management.

Continuing Education Requirements: Complete and report a minimum of 40 hours every two years of continuing education (CE) credit, including two ethics hours and one hour of Tax or Regulation.

CPA – Certified Public Account
Issued by: AICPA

Prerequisites/Experience Required:

- Pass all four sections of the exam within 18 months, earning a minimum score of 75 on each part.
- Each state/jurisdiction has its own set of education and experience requirements.

Examination Type: Certified Public Account (CPA) Examination

Content: Auditing and Attestation, Business Environment and Concepts, Financial Accounting and Reporting and Regulation.

Continuing Education Requirements: Continuing Professional Education (CPE) requirements vary by state. In Colorado, the general requirement includes 80 hours every two years, including four hours of Ethics training.

PFS - Personal Financial Specialist
Issued by: Investments & Wealth Institute

Prerequisites/Experience Required:

- Hold a valid CPA license and be a regular member of the AICPA.
- Earn a minimum of 75 hours of PFP continuing professional development (CPD) within the 5 years preceding submitting the PFS application.

- Within the 5 years preceding the PFS application having completed 2 years of full-time business or teaching experience (or 3,000 hours equivalent) in personal financial planning or, for candidates in academia, a qualified credential holder should be a full-time professor and have taught at least 4 accredited college courses with 50% of their material included in the CPA/PFS Body of Knowledge. Up to 1,000 hours of tax compliance experience can count toward the total experience requirement.

Educational Requirements: Earned 75 hours of personal financial planning continuing professional development (CPD) within the five-year period preceding the date of PFS application.

Examination Type: CPA/PFS Certification Examination

Content: Personal financial planning, including tax, estate, retirement, investments; insurance planning, employee benefits, education, and elder planning.

Continuing Education Requirements: Annually complete 20 hours of continuing professional development within the credential body of knowledge.

CRPC – Chartered Retirement Planning Counselor®

Issued by: College for Financial Planning

Prerequisites/Experience Required: N/A

Examination Type: CRPC Certification Examination

Content: Maximizing the Client Experience during the Retirement Planning Process, Principles of Strategies when Investing for Retirement, Making the most of Social Security Retirement Benefits, Bridging the Income Gap: Identifying other Sources of Retirement Income, Navigating Health Care Options in Retirement, Making the Emotional and Financial Transition to Retirement, Designing Optimal Retirement Income Stream, Achieving Income Tax and Estate Planning Objectives in Retirement and Fiduciary, Ethical and Regulatory Issues for Advisors.

Continuing Education Requirements: Annually complete 16 hours of Continuing Education credits every two years.