Item 1 Cover Page

CreativeOne Wealth, LLC

6330 Sprint Parkway, Ste. 400
Overland Park, KS 66211

913-402-7897

Form ADV Part 2A

March 31, 2026

www.CreativeOneWealth.com

This Brochure provides information about the qualifications and business practices of CreativeOne Wealth LLC ("C1W, LLC"). If you have any questions about the contents of this Brochure, please contact C1W Compliance at 913-402-7897 or by email at compliance@creativeonewealth.com

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about C1W, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The Firm's CRD number is 281213. Any reference to C1W, LLC as a "registered investment adviser" or as being "registered" does not imply a certain level of skill or training.

Item 2 - Material Changes

Item 2 discusses material changes that were made to this Brochure since the last update. It does not describe other modifications to this Brochure, such as updates to dates and numbers, stylistic changes, or clarifications. The following material change(s) have been made since the last amendment on April 15, 2025:

Item 4 – Advisory Business

- We have added a new disclosure regarding rollover recommendations. This disclosure outlines the options available to clients leaving an employer-sponsored retirement plan and describes the potential conflict of interest that may arise when the Firm recommends rolling over retirement assets into a Firm managed account.

Item 12 - Brokerage Practices

- We have added a new disclosure describing additional benefits and services we receive from Schwab and Fidelity that generally benefit our firm. This disclosure identifies the nature of those services and describes the resulting conflict of interest.

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

- We have expanded our disclosure regarding the risks associated with investing. This update provides additional detail on general investment risks that clients should consider when engaging our advisory services.

Item 14 - Client Referrals and Other Compensation -

- We have added a new disclosure regarding arrangements that may be offered to certain Investment Adviser Representatives to assist with transitioning to C1W. This disclosure outlines the general terms of these arrangements and notes the potential conflict of interest that may arise as a result.

The Firm encourages all current and prospective clients to read this Brochure carefully and, in its entirety, and to discuss any question you may have with us.

Pursuant to SEC Rules, we will provide you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may provide other ongoing disclosure information about material changes as necessary.

Item 3 – Table of Contents

Item 4 – Advisory Business

Description of the Advisory Firm

CreativeOne Wealth, LLC (hereinafter "we", "us", the "Firm" or "C1W") is an investment adviser registered with the United States Securities and Exchange Commission ("SEC") and is a Limited Liability Company organized under the laws of the State of Kansas. C1W filed its application to become registered as an investment adviser on September 25, 2015.

The primary owners of C1W are CM2 Holding Company, Inc., See Also, LLC, and JRC Equity Partners, LLC.

Advisory Services Offered

The Firm provides Asset Management and Financial Planning Services through its Investment Adviser Representatives ("IARs") for its clients, each of which is described below. IARs are generally independent contractors of the Firm. They may have their own business entities, or use another name ("doing business as" which is commonly known as a "dba") that may not be a business entity, with trade names, logos, and websites that they use in marketing the services they provide through C1W. Such business entities are generally owned by one or more IARs of the Firm, not the Firm itself. The names of these business entities/dba's are set out in the IAR's ADV 2B Brochure Supplement. Clients should understand that the businesses are generally legal entities of the IAR and not of the Firm or the custodian. Additionally, the business entities owned by the IAR may provide services other than investment advice. IARs may choose to use the CreativeOne Wealth name instead of setting up their own business entity. In this case, the IARs are not owners of CreativeOne Wealth. All IARs are under the supervision of the Firm and the advisory services of the IAR are provided through the Firm.

Clients collaborate with a C1W IAR to determine which services to employ to best help clients reach their financial goals. The Firm will maintain the direct contractual relationship with each client and obtain, through such agreements, the authority to engage independent third-party managers, as applicable.

Asset Management Services

The Firm's principal service is fee-based investment advisory services ("Asset Management Services"). We manage investment portfolios on a discretionary basis consistent with clients' investment objectives and guidelines. Prior to engaging C1W to provide Asset Management Services, the client is required to enter into a written agreement (titled a "Discretionary Investment Management Agreement" or "DIMA") with the Firm setting forth the terms and conditions under which the firm shall render its services. The DIMA grants us discretionary authority to manage the client's investments based on the individual needs, goals, objectives, investment time horizon, and risk tolerance of each client. The Firm will not assume any responsibility for the accuracy of information provided by the client, and we are not obligated to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

The Firm uses documents and/ or client interviews designed to ascertain client suitability which is analyzed by our IARs. Once the analysis is complete, the IAR develops an investment strategy with the prospective client that addresses specific investment criteria and allocation of the client's assets. Asset management services include but are not limited to the development of an Investment Strategy; analysis and monitoring of Asset Allocation; Risk Tolerance evaluation; Personal Investment Policy for Model Portfolios; Asset Selection; and Regular Portfolio Monitoring. The IAR evaluates the current investments of each client, with respect to their risk tolerance levels and time horizon. We request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction when investing in model strategies. In certain circumstances, however, the clients' accounts may be administered by the IAR on a non-discretionary basis.

Disclosure Regarding Rollover Recommendations: A client or prospect leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) rollover to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If the Firm recommends that a client roll over their retirement plan assets into an account to be managed by the Firm, such a recommendation creates a conflict of interest if the Firm will earn new (or increase its current) compensation as a result of the rollover. No client is under any obligation to roll over retirement plan assets to an account managed by the Firm.

Investments managed by the Firm through the C1W Platform (C1W's online portal that provides performance reporting, proposal generation, and document storage) are custodied at the brokerage firm ("Custodian") through which transactions are placed. Clients should be aware that IARs may make different recommendations with respect to the same securities based upon each client's suitability profile. Rebalancing of the asset allocation models will occur as necessary. Account rebalancing is accomplished by buying and selling shares of stocks, mutual funds, or exchange-traded funds to reach target allocations.

Selection of Other Advisers

The Firm has discretion to choose third-party investment advisers (depending on the contractual relationship, these third-party advisers may be referred to as "Sub-Advisers" or "Model Managers") to manage all or a portion of the client's assets. Third-party advisers exercise the same degree of discretion as afforded to C1W by the client (see also Item 16). However, clients may specify from the third-party investment advisers on the C1W platform which third-party adviser they would like to use.

We may also refer clients to unaffiliated third-party registered investment advisers. Under these arrangements, the Firm will typically receive a portion of the ongoing advisory fees collected by the third-party adviser for services provided to clients. IARs may also assist the third-party adviser with the ongoing management of the client's accounts. However, we will only refer clients to third parties if it is in line with the client's objectives and best interests.

Financial Planning and Investment Consultative Retainer Services

Through C1W IARs, we offer comprehensive financial planning services for individuals, families, and businesses. Financial Planning services include data gathering and analysis, along with creating a financial plan with specific recommendations and implementation advice tailored to client needs. Depending on the individual client's needs, specific areas of planning advice can include investment planning, insurance assessment, retirement planning, cash flow management, debt consolidation, capital needs assessments, educational planning, estate planning, and business planning. Clients must sign a Financial Planning Services Agreement when contracting with the Firm for this service.

The IAR may also, as requested, recommend changes to the client's investment portfolio or plan in writing. Changes in the client's financial condition, personal circumstances, goals, or general economic conditions may trigger changes in the plan. To the extent material changes have occurred to a client's circumstances or goals, or to the extent a client requests a new strategy or project, thereby causing a significant change to the existing plan, the client will be asked to sign a new Financial Planning Services Agreement. The client may contact the IAR as often as needed.

All planning is based on information provided by the client. It is the client's responsibility to be certain the Firm has current and accurate information to enable to prepare the initial plan. It is the client's responsibility to inform the IAR of material changes affecting the investments and planning strategies implemented.

The client is under no obligation to act on the IAR's financial planning recommendations. If the client elects to act on any of the recommendations made in a financial plan, the client is under no obligation to effect such recommendations through C1W, or our affiliated insurance broker, CreativeOne Marketing ,LLC, or our affiliated broker-dealer, CreativeOne Securities, LLC, as applicable, or through the IAR in his or her capacity as an insurance agent or registered representative of a broker-dealer as applicable. Please refer to *Item 10, Other Financial Industry Activities and Affiliations* for more information. The Firm's financial planning services or any products recommended within a financial plan are not necessarily at the lowest available cost.

We also offer investment consultative retainer services. Similar to financial planning arrangements, our retainer service does not include active management of client assets. Rather, the Firm's investment consultative services include providing client with ongoing and continuous consultative support addressing the client's financial circumstances and goals based on the client's current financial situation and the client's future needs and objectives. Through this service, clients will receive copies of notes from meetings and/or consultations with the C1W IAR and a written summary of the advice provided if requested. Our consultation agreements automatically terminate at the earlier of (i) the client's assets becoming actively managed by C1W or (ii) after six months since execution of the contract.

Retirement Plan Services

A C1W IAR may provide consulting services for an employer-sponsored retirement plan ("Sponsor"). Per the Retirement Plan Consulting Agreement, C1W agrees to provide non-fiduciary investment related educational information and related services to the Sponsor. Plan participants should not assume that general informational materials or educational sessions devised and/or provided by the Firm on behalf of the Sponsor serves as the receipt of, or as a substitute for, personalized investment advice from the Firm, or from any other investment professional. To the extent that any participant requires initial or ongoing personalized investment advice, he/she is encouraged to consult with the investment professional of his/her choosing. C1W shall have no discretionary authority or discretionary responsibility in the administration of the Sponsor's plan.

Serving as a Sub-Adviser to Independently Sponsored Advisory Programs

We may participate as a sub-adviser under other firms' advisory programs. In these arrangements, a Registered Investment Adviser ("RIA"), for which we are providing sub-advisory services, would recommend to a client that the client invests in models available on the C1W platform. In our role as sub-advisor, C1W will not provide individualized investment advice or recommendations or review any advice or recommendations made by the RIA. The RIA is solely responsible for complying with all federal and state rules and regulations. The Firm receives a fee from the RIA. The RIA may choose the investment strategies implemented which may or may not include C1W's proprietary models. The RIA collects the client's investment objectives for which we are providing sub-advisory services. Clients of third-party RIAs using the Firm's sub-advisory services should evaluate whether this program is suitable for their needs and objectives, and whether comparable or similar services are available at a lower cost elsewhere.

We serve as sub-adviser to the AdvisorShares STAR™ Global Buy Write Exchange Traded Fund ("ETF") (Ticker: VEGA) for which it earns a management fee. The fund pays AdvisorShares Investments, LLC (ASI) and then ASI pays C1W. C1W invests client assets in the VEGA ETF. Unless an exemption exists under applicable ERISA or Employee Benefits Security Administration guidance, C1W will not retain both a management fee from the VEGA ETF and an advisory fee for and services provided with respect to any ERISA-qualified plan. Refer to *Item 5 – Fees and Compensation* for further description of fees.

Services Limited to Specific Types of Investments
The Firm generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including traded REITs), variable annuities, equities, exchange-traded funds, options, corporate bonds, treasury inflation protected/inflation linked bonds and non-U.S. securities. We may use other securities as well to help diversify a portfolio when applicable.

A. Client Tailored Services & Client Imposed Restrictions

Specific client investment strategies and their implementation are dependent upon each client's current financial situation (including, but not limited to income, tax levels, and risk tolerance levels). Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values or beliefs. To implement such restrictions, the client must inform his or her IAR of the restrictions in writing. If, for any reason, we are unable to meet the client restrictions, the firm and/or IAR will notify the client. If the restrictions prevent the Firm from properly servicing the client account, or if the restrictions would require us to deviate from our standard suite of services, we reserve the right to end the relationship.

B. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. The Firm does not sponsor any wrap fee programs. However, we have a sub-advisory relationship with Betterment, LLC/MTG LLC (aka "Betterment Securities"). Betterment sponsors a wrap fee program named "Betterment for Advisors." Betterment manages the accounts in the wrap program and remits a portion of the fee collected to the Firm.

C. Assets Under Management

C1W has the following regulatory assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Calculated As Of:
$ 6,251,683,061	$0.00	December 31, 2025

Item 5 - Fees and Compensation

Fees paid to C1W are for the Firm's Advisory Services, sub-advisory services and for referring clients to third-party firms. The Firm also receives fees for sub-advisory services provided to VEGA ETF. Our fees do not include, for example, charges the client may incur from independent third parties such as accountants and attorneys. The Firm charges fees based on the type of service to be provided. The fees charged by C1W for its Advisory Services will be documented in each client's written agreement with the firm. Although C1W believes its advisory fees are competitive, clients should be aware that lower fees for comparable services may be available from other sources.

A. Asset Management Fees

Fees are generally negotiable. The fee schedule will be signed in the Schedule A of the Client Discretionary Investment Management Agreement ("DIMA"). IARs may recommend strategies outside the C1W Platform. The RIA Fee includes (i) an initial analysis and periodic re-evaluation of the client's investment objectives and needs, and discretionary allocation among portfolio managers, (ii) ongoing advisory services, including fees of portfolio managers/Sub-Advisers, and (iii) Access to the C1W Platform, including client portal, account aggregation, reporting statistics, and secure document storage vault.

IARs may negotiate the fee with each C1W client for services provided, including those noted above in Item 4. Thus, fees may vary between clients and from other IARs providing similar services. The range of fees for various asset management services offered by C1W are typically between .25% - 2.25%.

Fees for Asset Management Services are deducted from the client's investment account. Any prepaid fee that is unearned is prorated and returned to the client. Clients should also be aware that, absent transaction charges, total fees exceeding 2% per year are generally considered higher than those charged by other comparable services available to a client. Given their active management style and internal holdings, some models managed by C1W may exceed 2.00%. Fees for financial planning services may be deducted from a client's investment account or paid directly to C1W.

From time to time, the fee deducted from the client's investment account as illustrated on the statement may differ from a manual calculation of the monthly or quarterly fee based on the same account value. There are a number of reasons why this may occur, namely that fees may be calculated in advance, based on average daily balance or in arrears. When calculated in arrears, C1W includes accrued interest in our billable value, but not accrued dividends; custodial statements use settlement date valuation instead of trade date valuation; the custodial statement does not include all transactions that occurred towards the end of the month such as pending trade settlements; and inflow and outflows of assets during the time period. More information about billing specifics is available on request. Each quarter, the Firm reviews a sampling of its calculation of fees and compares it to the balance that appears on the custodial statement. Any material discrepancies are investigated and documented. Clients are encouraged to closely review their custodial statements for accuracy.

Clients are encouraged to obtain and carefully review the contracts and disclosure documents of the third-party manager and/or program sponsor whose services they are considering, including Part 2A of Form ADV, so they fully understand the services being provided and fees being charged. Clients are also encouraged to compare programs or similar services offered by other investment advisers.

Asset management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis or quarterly basis. For asset management fees incurred on accounts held outside of C1W, the client must complete an Outside Account Billing Agreement electing to deduct fees for Outside Accounts from specified accounts managed by C1W or by direct payment such as check. Generally, asset management fees are paid in arrears; however, fees may be charged quarterly in advance for certain clients. Furthermore, fees are negotiable with each of our clients until signed and agreed to in the final fee schedule attached as Schedule A of the Client DIMA.

Negotiated Rate to Client

As stated within Schedule A or other fee schedule of the Client DIMA, client rates may be negotiated between the Firm and the client. The negotiated rate is billed monthly or quarterly in arrears or in advance for services rendered, as negotiated with the client. Fees for partial periods are prorated based on the number of days the account was serviced during the applicable period. Clients may terminate the agreement without penalty for a refund of unearned advisory fees within five business days of signing the Client DIMA. Thereafter, clients may terminate the DIMA generally with 30 days' written notice. Termination of this Agreement will not affect (i) the validity of any action previously taken by C1W and third-party investment advisers under the agreement; (ii) the liabilities or obligations of the parties with respect to transactions initiated before termination of the agreement; or (iii) client's obligation to pay the negotiated rate (prorated through termination).

The firm employs two different fee arrangements for C1W Select Asset Management Services.

Under the first arrangement, the “Floating Rate Method,” the rate charged to the client may increase or decrease depending on the strategy chosen by the IAR servicing the account. For example, a hypothetical client’s Schedule A may state that the IAR’s fee is 100 basis points, C1W’s program fee is 55 basis point, and the strategy selected is 20 basis points for a combined fee of 175 basis points (i.e., 1.75%). However, should the IAR invest the client’s assets into a strategy that has a fee of 40 basis points, the fee increases to 195 basis points (1.95%) for that portion of the client’s assets. Comparatively, if the same assets are later invested in a less expensive portfolio, the overall fee paid by the client is reduced accordingly.

Under the second arrangement, the “Total Rate Method,” the rate remains constant regardless of which portfolio(s) the client’s assets are invested in. If the IAR selects a less expensive strategy for the client, the portion of the overall fee payable to the IAR will increase. For example, a hypothetical client’s schedule A may establish the client’s total fee at 1.75% with C1W’s program fee being 55 basis points and the selected strategy fee being 20 basis points. The remaining 1.00% is received by the IAR However, should the IAR invest the client’s assets into a strategy that has a fee of 10 basis points less, the portion of the fee payable to the IAR is increased by the same amount (i.e., the IAR’s portion is increased 10 basis points from 100 basis points to 110).

The Total Rate Method creates a conflict of interest; the IAR has a financial incentive to recommend a less expensive portfolio to a client, which may not be in the client’s best interest, thereby resulting in a higher percentage of fees collected payable to the IAR. We mitigate this conflict of interest in part by providing training to our IARs on at least an annual basis. Additionally, C1W analyzes client accounts during branch exams of our IARs’ individual practices. For more information about our review process of client accounts, please refer to *Item 13 - Review of Accounts.*

In addition to the asset management fee, there may be transaction, commission, administrative, servicing, and other fees charged by the Custodian. IRA accounts may be charged custodial or other service fees. If your account is invested in mutual funds, the mutual fund company may assess administrative charges against your investment in that fund. These fees are not charged by C1W, but rather by the product sponsor, brokerage firm, or custodian firm. In the normal course of effecting transactions, prices for certain trades made on behalf of your account may include mark-ups, mark-downs, and spread differentials.

Selection of Other Advisers Fees
C1W will be compensated via a fee share from other third-party advisers. These arrangements will either be in the form of herein the Firm directs clients to a third-party for advisory services, or a Sub-Advisory Relationship where a firm manages all or a portion of the client's assets. The terms of these relationships, including compensation, will be memorialized in each contract between C1W and each third-party adviser.

The notice of termination requirement and payment of fees will be dependent on the specific third-party adviser’s client agreement.

Whether C1W refers clients to a third-party RIA or engages a sub-adviser to aid the Firm with managing all or portions of a client’s investments, fees owed to such third-party firms will be deducted directly from client investment accounts. The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and the arrangement between the third-party adviser and C1W.

Fees for the Firm Serving as a Sub-Adviser
We may also act as a sub-adviser to unaffiliated third-party advisers. C1W would receive a share of the fees collected from the third-party adviser’s client. In the event a sub-adviser selects C1W’s investment models, the fees are negotiated between the investment advisers

and clients. The notice of termination requirement and payment of fees for sub-adviser services will depend on the specific third-party investment adviser engaging C1W as sub-adviser. This relationship will be memorialized in each contract between C1W and each third-party adviser.

C1W is a sub-adviser to the AdvisorShares STAR™ Global Buy Write ETF (VEGA) and earns a sub-advisory fee for these services directly from the fund. In situations where the Firm invests all or part of a client's assets in the VEGA ETF, C1W will receive a sub-advisory fee of 55 bps from this ETF in addition to an investment management fee from the client. Clients should note that they have the option to purchase the VEGA ETF through other brokers or agents not affiliated with C1W. Unless an exemption exists under applicable ERISA or Employee Benefits Security Administration guidance, C1W will not retain both a management fee from the VEGA ETF and an advisory fee for and services provided with respect to any ERISA qualified plan.

There are potential conflicts of interest related to C1W's role as and use of Sub-Advisers. Please review *Item 10 - Other Financial Industry Activities and Affiliations* for more information about the conflicts of interest presented by these arrangements and how we mitigate them.

Fees for C1W's sub-advisory services will be withdrawn from clients' accounts, as disclosed in each contract between the third-party adviser and the client.

Financial Planning Services
As mentioned under *Item 4, Advisory Services Offered,* through C1W IARs, we offer comprehensive financial planning services for individuals, families, and businesses, Fees charged for Financial Planning are negotiable and are based on a fixed fee-per-project basis, or on an hourly, monthly, or quarterly fee basis, or a combination of these methods. The hourly rate stated within Schedule A of the Client Financial Planning Agreement. These rates may be negotiated.

Hourly rates and total fees are determined by each IAR estimating the complexity of the client's circumstances, the level of skill required to perform the service, and the amount of time that will be required to perform research, analysis, and plan preparation. The estimated fee is disclosed to the client prior to contract signing.
The fees described above may change based on special situations such as an expansion of a project, increase in the number of reviews, more specialized needs of the client, more complex planning, or more detailed reporting. Before such a change may be made, the client is given 30 days' prior written notice.

Each client retains the right to terminate the Financial Planning Services Agreement with C1W at any time, in writing and without prior notice, for any reason. The Firm retains the right to terminate any engagement at any time, for any reason, by giving 10 days' written notice. Any unearned pre-paid fee is returned to the client upon termination. When calculating any refund, a pro rata amount shall apply to work already performed on a fixed fee basis.

The fee is payable directly by a client or through deduction from the client's investment account. Payment arrangements are established in the Financial Planning Services Agreement. The fee may be waived in whole or in part by the IAR or C1W at their sole discretion.

Fees do not include product transaction commissions, or the fees for third-party professional services, e.g., investment managers, attorneys, accountants or other third parties.

Investment Consultative Services Retainer Agreement
As mentioned under *Item 4 Advisory Services Offered*, the Firm also offers investment

consultant services for individuals, families, and businesses. Fees charged for consultant services are negotiable and are based on a fixed rate. The fee ranges depending on the complexity and nature of the services.

Total fees are determined by each IAR estimating the complexity of the client's circumstances, the level of skill required to perform the service, and the amount of time that will be required to perform research, analysis, and consultation. The estimated fee is disclosed to the client prior to contract signing.

The fees described above may change based on special situations such as an expansion of a project, increase in the number of reviews, more specialized needs of the client, more complex planning, or more detailed reporting. Before such a change may be made, the client is given 30 days' prior written notice. Retainer Agreements are valid for six (6) months after signing the Agreement.

Each client has the right to terminate the Retainer Agreement with C1W at any time, in writing and without prior notice, for any reason. C1W has the right to terminate any engagement at any time, for any reason, by giving 10 days' written notice. Any unearned pre-paid fee is returned to the client upon termination. When calculating any refund, a pro-rata amount shall apply to work already performed on a fixed fee basis.

The fee is payable directly by a client and not deducted from the client's account. Payment arrangements are established in the Retainer Services Agreement. The fee may be waived in whole or in part by the IAR or C1W at our sole discretion.

Fees do not include product transaction commissions, or the fees for third-party professional services, e.g., investment managers, attorneys, accountants or other third parties.

Retirement Plan Consulting Services
For employer sponsored retirement plans ("Sponsor"), C1W will be compensated as determined by the Sponsor and/or from each participant's account for its consulting services. Fees will be debited from participant accounts following each calendar month or quarter (however specified by applicable Recordkeeper) after the plan has been funded.

Client Responsibility for Third-Party Fees
All fees paid to C1W for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds, exchange-traded funds, variable annuities, and other investment advisers, broker/dealers and custodians retained by clients, if any. Such fees and expenses are described in each mutual funds and variable annuity's prospectus, each third-party investment adviser's Form ADV Part 2A, Wrap Brochure or similar disclosure statement, and by any broker/dealer or custodian retained by a client.

Furthermore, clients will incur brokerage commissions and other execution costs charged by the custodian or executing broker/dealer in connection with transactions for a client's account. Clients should further understand that all custodial fees and any other charges, fees, and commissions incurred in connection with transactions for a client's account will be paid out of the assets in the account. Please refer to *Item 12 - Brokerage Practices* for additional important information about the brokerage and transactional practices of C1W.

Prepayment of Fees

Asset Management Fees
The Firm usually bills its investment management fees monthly or quarterly in arrears based upon fair market value of the managed assets as determined on the last day of the applicable month or based on the average daily balance for the account during the previous

month/quarter. However, C1W may, from time to time, bill its investment management fees monthly or quarterly in advance for services rendered, as negotiated with the client. Fees for partial periods are prorated based on the number of days the account was serviced.

Financial Planning and Investment Consultative Retainer Service Fees
Any unearned prepaid fee is returned to the client upon termination. In no instance will Clients pay six (6) months or more in advance before receiving a financial plan or consultative services.

Outside Compensation for the Sale of Securities to Clients
Certain supervised persons may be eligible for compensation for the sale of securities or other investment products. Further information regarding this arrangement can be found in Item 10.

Item 6 - Performance Fees

We do not charge performance based fees.

Item 7 - Types of Clients

We mainly provide advisory services to individuals, high-net-worth individuals, and third-party investment advisers through our sub-advisory services. C1W also has other types of clients, including corporations and other businesses, non-profits, and some 401(k)s and other employer-sponsored retirement accounts. The Firm provides advisory services to other types of clients besides these.

The Firm typically requires a minimum investment amount in our Models to ensure the objective of the model can be met. However, under limited circumstances and the discretion of the CCO or his or her designee, exceptions may be made.

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

Investing in securities involves a significant risk of loss, including loss of principal. Clients should be aware that there may be a loss or depreciation to the value of the client's account, which clients should be prepared to bear. There is no assurance that a positive return will be obtained in any managed investment account program. Neither C1W nor any selected third-party investment advisers guarantee the performance of the account, promise any specific level of performance, or promise that investment decisions, strategies or overall management of the account will be successful. C1W does not represent, guarantee or imply that the services or methods of analysis employed by the firm can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Investment decisions are subject to various market, currency, economic, political, interest rate and business risks, and will not necessarily be profitable.

As a registered investment adviser, C1W and its IARs act as fiduciaries under the Investment Advisers Act of 1940, adhering to duties of care and loyalty. This includes understanding investments' risks, rewards, and costs; gathering sufficient client information to develop a comprehensive investor profile (e.g., financial situation, income needs, assets/debts, marital status, tax status, age, time horizon, liquidity, risk tolerance, experience, objectives, and goals); and ensuring recommendations have a reasonable basis to be in the client's best interest.

A. Methods of Analysis and Investment Strategies

Methods of Analysis
The Firm's methods of analysis include charting analysis, fundamental analysis, technical

analysis, cyclical analysis, quantitative analysis and modern portfolio theory.

Charting analysis involves the use of patterns in performance charts. This technique is used to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Technical analysis involves the analysis of past market data, primarily price and volume.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

Quantitative Analysis is a technique that uses mathematical and statistical modeling, measurement, and research to understand behavior. Quantitative analysts represent a given reality in terms of numerical value. Quantitative analysis is applied to the measurement, performance evaluation, valuation of a financial instrument, and predicting real-world events such as changes in a country's gross domestic product (GDP).

Investment Strategies
The Firm utilizes a blend of model portfolios and boutique individual equity investment managers. The model portfolios consist mainly of ETFs, but some mutual funds are included when justified by their alpha performance (the excess returns earned on an investment above the benchmark return) or by their managers' knowledge and expertise within their fund objective or asset class. The model portfolios are broken down between risk-based asset allocation models and other more specifically targeted models for income or all equity exposure. The boutique individual investment managers are utilized for individual stock selection targeting a given asset class or more targeted and/or specialized exposures.

Asset Allocation
The Firm utilizes different investment managers to provide their risk-based asset allocation models, including C1W's proprietary models. Each manager provides risk-based models ranging from conservative to aggressive or growth, Each manager has its own philosophy and process to construct their models, but they all have the goal of targeting a specific asset allocation and risk level.

C1W's proprietary model suite consists of three versions of "Core" risk-based asset allocation models. The Core ETF model consists only of ETFs. The Core and Core Tax-Aware versions are for larger accounts and include ETFs and mutual funds. C1W also offers an environmental, social, and governance (ESG) version of risk-based models and a sector rotation model consisting of ETFs. For smaller accounts, C1W offers Long Horizon ETF only models that rebalance annually. The Firm's proprietary models utilize quarterly trades/rebalances, and potential ad hoc trades given the investment landscape. The Core Tax-Aware model trades semi-annually. Target equity/fixed income targets across models can vary +/-5%.

Third party managers primarily utilize ETFs in their models but may use mutual funds. These managers typically rebalance quarterly; however, some of the more tactical third-party managers will make minor shifts throughout the year while still staying within a 10 - 15% range of their broad equity and fixed income target asset allocations.

Income Models
The Firm utilizes three proprietary risk-based income generation models that primarily consist of both equity and fixed income-based ETFs but may use Mutual Funds. C1W also utilizes other firms for their expertise including fixed income, liquid alternative, and dividend managers.

Individual Investment Managers
The Firm utilizes third-party investment managers for a variety of strategies. These include individual Equity and Fixed Income portfolios in specified asset classes. The managers provide portfolios of individual securities, and the Firm executes the trades on behalf of the client, according to the portfolio delivery instructions. The managers include Large cap, Small-Mid cap, Small cap, REITs, International and ESG.

Other third-party strategies include:
- Tax-optimized indexed equity separately managed accounts (SMAs) from standard indexes to blended benchmarks for custom exposure. These strategies may also incorporate values aligned investing and factor tilts.
- Concentrated stock hedging solutions utilizing options which may reduce the risk of the underlying position.
- Unified Managed Account (UMA) program for higher net worth clients that combines SMAs from multiple third-party managers which may include stocks, bonds, and other diversifying asset classes.
- Private Equity Manager for high net worth/accredited investors.
- Private credit offering for eligible clients investing directly in loans made to middle-market companies.
- A non-traded US Government Income REIT that investments in institutional quality real estate with leases backed by the full faith and credit of the U.S. Government.

The Firm will allow some advisers to select individual investment managers. These are one-off adviser driven instances.

IAR Managed (Adviser Select Program):
This Program is offered through C1W's IARs where they are permitted to build and trade unique portfolios held in your account on a discretionary basis. The portfolios will be allowed on the platform for only that IAR's clients' usage.

B. Material Risks Involved

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

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

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

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

Modern Portfolio Theory assumes that investors are risk adverse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Active Management Risk: This process concentrates on factors that are believed to lead to the quality and future success of particular money managers. The risks assumed are that the manager will fail to perform as expected, there is a potential for higher fees/costs and an increased probability of taxable events.

Asset Allocation Risk: The success of asset allocation depends upon the manager's ability to make decisions that will achieve an account's objectives. Asset categories may not perform as expected due to economic and market influences, both foreign and domestic, and anticipated returns may not be realized.

Concentration Risk: Over-allocation to single holdings, sectors, or asset classes can lead to amplified losses and heightened volatility.

Geopolitical Risk: Investments may be impacted by global political events, including trade disputes, tariffs, sanctions, military conflicts, and regulatory changes. Such events can lead to market volatility, currency fluctuations, supply chain disruptions, and changes in economic conditions, which may negatively affect investment performance.

Lack of Diversification Risk: Concentrated portfolios, including portfolios with a concentration in one asset class, typically result in increased risk and volatility and decreased diversification, which could result in losses.

Liquidity Risk: Liquidity is how easily an asset or security can be bought or sold in the market and converted to cash. Generally, the less liquid an asset is, the greater the risk that if an investor needs to sell the asset quickly, the asset will be sold at a loss. Simple assets tend to be more liquid than complex assets. An asset tends to be more liquid if it represents a standardized product or security and there are many traders interested in making a market in that product or security. As it pertains to these types of strategies, C1W does not offer qualified tax or legal advice. Additionally, C1W does not hold itself out as a tax advisor and does not provide such services. Therefore, C1W recommends consulting with a tax advisor if you have tax-related questions.
Political Risk: Government decisions may damage the value of your investments. Changes to social security, benefits law, and tax law may impact your financial decisions. Any foreign investments may be impacted by the decisions of their local governments.

Tax Risks: Some of the products offered are subject to tax law that is complex and subject to varying interpretations. Moreover, the effect of existing income tax laws and possible changes in such laws will vary with the particular circumstances of each investor. You should consult with and rely on your own tax professional with respect to the possible tax consequences, including risks and advantages, of an investment.

Timing Risk: While it is likely that stocks will gain over long periods of time, this may not be the case in the short-term. If you need to protect your principal investment, timing is an important risk to consider.

Bank Deposit Sweep Programs (BDSP): Clients whose assets are held at a custodian may be automatically enrolled in the firm's cash sweep program, through which uninvested cash balances are swept into a designated bank deposit account. While these programs provide liquidity and FDIC or SIPC protections (subject to applicable limits), the yields offered through sweep vehicles are determined by the custodian and may be significantly lower than yields available through alternative cash management vehicles.

Cybersecurity Risk: Investment advisers and their service providers may be prone to operational and information security risks resulting from cyber-attacks. Cyber-attacks include, among other behaviors, stealing or corrupting data maintained online or digitally (including, for example, through cyber- attacks known as "phishing" and "spear-phishing"), denial-of-service attacks on websites, the unauthorized release of confidential information and causing operational disruption. Cyber-attacks may interfere with the processing of transactions, cause the release of private information or confidential information of C1W, cause reputational damage, and subject C1W to regulatory fines, penalties or financial losses, reimbursement or other compensation costs, and/or additional compliance costs. While C1W has established business continuity plans and systems designed to prevent such cyber-attacks, there are limitations in such plans including the possibility that certain risks have not been identified.

***Selection of Other Advisers*:** Although C1W will seek to select only money managers who will invest clients' assets with the highest level of integrity, C1W's selection process cannot ensure that money managers will perform as desired and C1W will have no control over the day-to-day operations of any of its selected money managers. C1W would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift," regulatory breaches, or fraud.

C. Risks Associated with Our Investment Strategies and Models

The implementation and composition of our asset management programs, including those described above, is at the discretion of C1W and thus may not be what the client would want at that specific time. As determined by our Investment Committee, C1W may elect to replace a program or manager which could result in a program that is slightly different than the previous program. C1W will keep consistent the clients' stated risk tolerance when electing a replacement model. We may use newly listed, low-asset, or low-volume investments in our portfolios.

Investment advice and models provided by C1W may not be tax efficient. C1W does not provide legal, accounting, or tax advice. Thus, clients should obtain independent tax, legal and accounting advice before implementing any advice offered by C1W.

Comparing the performance of an account managed by C1W may be difficult as it is not easy to find a comparable benchmark, and unmanaged indices such as the S&P 500 cannot be managed and therefore are not suitable comparisons, either. Thus, it may not be possible for clients to truly gauge how their portfolio is performing relative to the market when receiving

C1W's services.

It may take an indeterminate amount of time to allocate the account assets to achieve the chosen asset allocation, especially for small portfolios or if only subsequent deposits are to be used to reallocate account assets. The number of securities in the portfolio will vary by the model or strategy employed. If a client desires to achieve the chosen allocation as soon as possible, or has specific prohibitions or trading criteria, the client must inform C1W of their desire in writing; C1W is not always able to accommodate such requests.

Although C1W generally recommends clients purchase ETFs and mutual funds, at times we recommend clients purchase securities that involve greater risks related to liquidity, volatility, earnings, headlines, interest rate, and potential unfavorable fluctuations in underlying asset and/or index values. For example, international investments may be subject to economic or political instability, credit risk, and exchange-rate fluctuations. Also, we may recommend a client heavily weigh their portfolio in a single asset class or even a single security.

Some investments in certain funds used by C1W may be denominated in foreign currencies. Changes in the relative values of foreign currencies (including the Euro) and the dollar, therefore, will affect the value of investments in portfolios with these funds. Funds used may purchase foreign currency futures contracts and options in order to hedge against changes in the level of foreign currency exchange rates, but there can be no assurance that the client's portfolio will not be subject to significant fluctuations in foreign currency valuations.

Private investments intended for accredited investors are considered non-traded and may be illiquid. These investment vehicles typically offer quarterly redemption windows equal to a stated percentage of outstanding NAV, but these redemption windows are subject to the discretion of the investment provider and client's many not have access to their full investment when needed.

D. Risks of Specific Securities Utilized

***Mutual Funds*:** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. Higher-expense share classes may result in increased costs to clients if lower-cost alternatives are available, potentially eroding returns without added benefit.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the most well-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting; however, they carry a potential risk of losing share price value. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

***Exchange Traded Fund ("ETF")*:** An ETF is an investment fund traded on exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Information on a specific ETF risk and its policies regarding the above topics can be found in its prospectus and Statement of Additional Information. Clients should review the prospectus before investing.

Unit Investment Trust ("UIT"): A UIT is a product where a financial company buys or holds a group of securities, such as stocks or bonds, and makes them available to investors as redeemable units. UITs raise money typically in a one-time public offering, with each unit representing ownership and a proportional right to income and capital gains generated by the fund's investments, typically either stocks or bonds. The performance of a UIT's underlying investments, minus fund fees, determines the trust's investment return. UITs have a stated expiration date based on what investments are held in their portfolio; when the portfolio terminates, investors get their share of the UIT's net assets. The UIT will inherit all the risks associated with the securities in which it invests, such as credit, business, and market risk. Additionally, because UITs are not redeemable until the end of their respective terms, they are also susceptible to liquidity risk.

Real Estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements or other long-term goals. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do. While C1W sells variable annuities, we do not sell fixed, or equity-indexed annuities. As described in Item 10, most of C1W's IARs are licensed insurance agents and may recommend or include annuities as part of the client's investment strategy.

Non-U.S. Securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Options Trading: Writing and purchasing call and put options are highly specialized activities and entail greater than ordinary investment risks. The successful use of options depends in part on the future price fluctuations and the degree of correlation between the options and the securities markets. The value of positions in options fluctuates in response to changes in the value of the underlying security. There is also the risk of losing all or part of the cash paid for purchasing call and put options. Assets covering written options cannot be sold. As a result, there is a possibility that segregation of a large percentage of the assets could affect its portfolio management as well as the ability to meet other current obligations. Unusual market conditions or lack of a ready market for any particular option at a specific time may reduce the effectiveness of the option strategies, and for these and other reasons option strategies may not reduce the volatility to the extent desired. A reduction in the holdings of put options may result in an increased exposure to a market decline. Cash secured puts are utilized when it is more favorable than being long the underlying security.

The Options Clearing Corporation provides a comprehensive document disclosing the characteristics of options and their risks. The document is titled “Characteristics and Risks of Trading Standardized Options.” A copy may be obtained online at http://www.optionsclearing.com/about/publications/character-risks.jsp, or upon request, we will provide you with a copy.

Digital Assets represent an emerging asset class that has not been fully defined. There remains an overwhelming lack of clarity regarding the regulatory framework that will ultimately govern this investing sector. Additionally, a considerable list of risk factors carries their own range of probability and impact possibilities. Those risks include but are not limited to valuation risk; liquidity risk; volatility risks; technology risk; and legal, tax, and regulatory risk. Importantly, unless a Digital Assets is traded on an exchange, they are not backed by a central bank or a national, supra-national or quasi-national organization, any hard assets, human capital, or other form of credit.

Structured Notes: We offer our clients structured notes strategies. These strategies are generally designed to provide clients with an alternative risk/reward payoff compared to owning the same asset directly. The structured notes objectives are to offer capital appreciation to equity indices and varying levels of downside protection to the index. They may also be used to provide income or principal protection. The risks involved with using structured notes are credit risk of the issuing investment bank, illiquidity, and market risk.

Private Investments: A private investment is a financial asset outside public market assets, meaning they are not listed on an exchange. Investors often access private investments through a private investment fund. A private investment fund is an investment company that doesn’t solicit capital from retail investors or the public. Hedge funds and private equity funds are two of the most common types of private investment funds. Private equity investing often has high investment minimums and they may also have higher liquidity risks since private equity investors are expected to invest their funds with the firm for several years, on average. There is no major public exchange for these investments, a fund manager may find it difficult to liquidate the investments in a fund in times of economic stress.

Leveraged/Inverse Funds: These funds use derivatives to achieve amplified or inverse exposure, often resetting daily, leading to compounded returns that may deviate significantly from the underlying index over periods longer than one day. Risks include extreme volatility, potential for substantial losses, and unsuitability for long-term holding.

Company Risk: When investing in stock positions, there is always a certain level of company or industry-specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company’s employees go on strike or the company receives unfavorable media attention for its actions, the value of the company’s stock may be reduced.

Credit Risk: The value of a portfolio may change in response to changes in the credit ratings of the portfolio's securities. Generally, investment risk and price volatility increase as a security's credit rating declines.

Default Risk: All bonds have some level of default risk. High Yield bonds are considered speculative and are susceptible to default or decline in value due to adverse economic and business developments.

Dilution Risks: Issuers of private placements may be required to raise additional capital. Future issuance of additional securities could dilute the ownership stakes of the issuer's then-existing owners, and there can be no assurance that the effects of such dilution will not be substantial. Additionally, any new class units that might be issued in the future may negatively impact the issuer's then-existing owners.

Duration Risk: Duration is a way to measure a bond's price sensitivity to changes in interest rates. The duration of a bond is determined by its maturity date, coupon rate, and call feature. Duration is a method to compare how different bonds will react to interest rate changes. For example, if a bond has a duration of five (5) years, it means that the value of that security will decline by approximately five percent (5%) for every one percent (1%) increase in interest rates.

Emerging Markets Risk: Investments in emerging markets may be subject to a greater risk of loss than investments in more developed markets. Emerging markets may be more likely to experience inflation risk, political turmoil, and rapid changes in economic conditions than more developed markets. Emerging markets often have less consistency in accounting and reporting requirements, unreliable securities valuation and greater risk associated with custody of securities.

Equity Market Risk: Stocks have risk in their returns and the principal invested in them is not guaranteed and they are subject to changing market conditions. Small stocks are typically more volatile than large stocks and are subject to significant price fluctuations.

Income Risk: An ETF or mutual fund's bond income may decline when interest rates fall. This decline can occur because: (1) the ETF or mutual fund must invest in lower-yielding bonds as bonds in its portfolio mature, (2) bonds in the underlying index are substituted, or (3) the ETF or mutual fund otherwise needs to purchase additional bonds.

Interest Rate Risk: Portfolios may change in response to the movement of interest rates. The price of a fixed income security will generally fall when interest rates rise.

Interval Fund Risk: Interval funds are classified as closed-end funds, but they are distinct because the shares do not trade on the secondary market, but instead periodically the fund offers to buy back a percentage of outstanding shares at net asset value. This results in the funds being largely illiquid. There is no guarantee that investors will be able to sell their shares at any given time or in the desired amount. Additionally, repurchase is done on a pro-rata basis; therefore, there is no guarantee that you can redeem the number of shares you want during a given redemption.

Municipal Bond Risks: Income from municipal bonds may be subject to the Alternative Minimum Tax (AMT), and capital appreciation from discounted bonds may be subject to state or local taxes. Capital gains are not exempt from federal income tax.

Non-Investment Grade Bonds: Commonly known as "junk bonds," non-investment grade bonds are "below investment grade quality" (rated below Baa3 by Moody's Investors Service, Inc. or below BBB- by Standard & Poor's Ratings Group and Fitch Ratings or, if unrated, reasonably determined by the Firm to be of comparable quality). Junk bonds represent bonds issued by companies that are financially struggling and have a higher risk of defaulting or not paying their interest payments or repaying the principal to investors. Investing in non-investment grade bonds can be speculative.

Non-Traded Business Development Companies: Non-traded business development companies ("non-traded BDC(s)") are a closed-end investment company that invests in small- and medium-sized businesses. Non-traded BDCs are not traded on an exchange. Therefore, they are subject to other types of risk, such as high-net-worth requirements, higher initial investments, higher sales commissions and fee structures, limited liquidity, longer-term investment horizons, and redemption limits and suspensions. Non-traded BDCs are limited to accredited investors, and they generally invest in companies that are still developing and/or may be in financial distress. As a result, the companies that a BDC invests in are more likely to go out of business or default on their debts. Additionally, BDCs often use leverage or debt to increase the potential for higher returns. However, leverage can also potentially increase losses. And finally, in addition to charging management fees, the fund manager may also charge a performance fee.

Options Trading Risks: Options strategies are subjectively categorized from low to high risk and can result in significant losses in complex trades if misjudged. Risks include subjectivity in risk assessment, potential for total loss of premium.

Publicly Traded Business Development Companies: Business Development Companies ("BDC(s)") are a type of closed-ended fund that provide retail investors a way to invest in small and medium-sized private companies and, to a lesser extent, other investments, including public companies. BDCs are complex and are associated with unique risks. Publicly traded BDCs can be bought and sold on national securities exchanges. BDCs are not limited to qualified investors. However, BDCs generally invest in companies that are developing and/or financially distressed. As a result, the companies that a BDC invests in are more likely to go out of business or default on their debts. Additionally, BDCs often use leverage or debt to increase the potential for higher returns. However, leverage can also potentially increase losses.

Reinvestment Risk: Reinvestment risk is the risk that future interest and principal payments may be reinvested at lower yields due to declining interest rates.

Sector Risk: When a substantial portion of assets are devoted to a particular market sector or industry, there is potentially greater volatility compared to broadly diversified strategies. A market sector or industry may underperform the market as a whole for a variety of reasons.

Small- and Medium-Capitalization Companies: Publicly traded companies are often segmented by their market capitalization—the total value of their shares in the market. Small-cap investing is often used when an investor is focused on growth opportunities. Though they historically outperform large-cap stocks, small-cap stocks are riskier. Prices of small-cap stocks are often more volatile than prices of large-cap stocks. The same can be said for some medium-cap stocks. Additionally, the risk of bankruptcy or insolvency for smaller companies is higher than for larger companies.

Past performance is not indicative of future results. Investing in securities involves a risk that you, as a client, should be prepared to bear.

Past performance is not indicative of future results. Investing in securities involves a risk that you, as a client, should be prepared to bear.

Item 9 - Disciplinary Information

Firms are required to report any legal or disciplinary events that are material to a client's evaluation of our advisory business and the integrity of our management. There are no required disclosures in relation to C1W and its management team.

Disclosure information specific to your investment adviser representative (if applicable) can be found on their supplemental ADV 2B or at www.adviserinfo.sec.gov.

Item 10 - Other Financial Industry Activities and Affiliations

IARs of C1W may also be registered representatives and/or agents of an affiliated or non-affiliated firm such as a broker/dealer or insurance agency, engaging in the business of selling life, health, long-term care, disability, and annuity insurance products as well as securities. In their role as registered representatives and/or insurance agents, IARs may receive separate compensation in the form of commissions for the purchase of securities through their affiliated broker/dealer as well as for the sale of insurance products.

IARs may have other business affiliations, such as accountants, tax advice and preparation, law practices, or pension consulting as more fully described in their respective Form ADV Part 2B. These practices are independent of and not affiliated with C1W. C1W does not provide accounting, tax, or legal advice.

A. Providing Financial Services on Behalf of a Broker-Dealer

The Firm is not registered as, nor does have a pending application to become a broker-dealer.

Affiliation with CreativeOne Securities, LLC.

C1W is under common ownership and control with a registered broker-dealer, CreativeOne Securities (hereinafter, "C1S," formerly known as "Client One Securities, LLC"). C1W and C1S are both owned in part by CM2 Holdings Company, Inc. C1W's and C1S' home offices are also located within the same building.

Certain IARs of C1W are separately licensed to sell securities as registered representatives of C1S or other registered broker-dealers unaffiliated with C1W. IARs, acting in their separate capacities as registered representatives, may sell, for commissions, general securities products such as stocks, bonds, mutual funds, exchange-traded funds, alternative investments, and variable annuity and variable life products to advisory clients. Should an investment advisory client purchase these products through a broker-dealer with whom the IAR is separately registered, whether C1S or another, the IAR will receive the normal and customary commission-based compensation in connection with the transaction. Such commissions are separate and distinct from any advisory fee charged to the client by C1W for investment advice or financial planning. In addition, to the extent that a client implements a securities transaction through our affiliated broker-dealer, C1S, compensation attributable to such transaction will also accrue to the benefit of our common ownership. Clients should be aware that the potential for the IAR, and in some cases, the owners of C1W, to receive additional compensation creates a conflict of interest that can impair the objectivity of the IAR when making advisory recommendations. This is because this potential creates incentive for the IAR to recommend that the client purchase securities or other investment products (and, in some cases, that such recommendations be implemented through C1W's affiliated broker-dealer) in order that the IAR may receive additional compensation rather than because it is in a client's best interest. C1W does not charge advisory fees on the C1S security transactions.

C1W does not require its IARs to solicit clients to implement securities or other recommendations through C1S. Clients of the Firm are free to implement investment advice through any broker-dealer or product sponsor they may select. However, clients should understand that, due to certain regulatory constraints, an IAR, when operating in his or her capacity as a registered representative of a broker-dealer, must place all purchases and sales of securities products in commission-based brokerage accounts through their affiliated broker-dealer or broker-dealer approved institutions. Refer to Subsection C below for details regarding how C1W seeks to address these and other conflicts of interest.

B. Registration Relationships Material to this Advisory Business and Resulting Conflicts of Interests

Affiliation with Creative One Marketing, LLC and Insurance Activities
C1W is under common ownership and control with CreativeOne Marketing, LLC, an insurance marketing organization. C1W and CreativeOne Marketing, LLC are owned in part by CM2 Holding Company, Inc. C1W and CreativeOne Marketing are located within the same building.

Certain IARs of C1W are separately licensed as life insurance agents with CreativeOne Marketing, LLC or other insurance agencies unaffiliated with C1W. In their separate capacities as licensed insurance agents, IARs are able to implement insurance and/or annuity recommendations for advisory clients for which they will receive commission-based compensation that is separate from and in addition to advisory fees charged to the client by C1W. Moreover, to the extent that a client implements a transaction through our affiliated insurance broker, CreativeOne Marketing, LLC, compensation attributable to such a transaction will also accrue to the benefit of our common owner. The determination of whether to recommend an insurance product to be included within a client's financial portfolio is at the discretion of the IAR. Clients should be aware that the potential for the IAR (or the common owners of C1W and CreativeOne Marketing, LLC) to receive additional compensation creates a conflict of interest that can impair the IAR's objectivity when making advisory recommendations. This is because it creates incentive to recommend that the client purchase annuities or other insurance products (and, in some cases, that such recommendations be implemented through C1W's affiliated insurance broker) in order that the IAR may receive additional compensation rather than because it is in a client's best interest. In addition, certain annuity products pay an upfront, lump sum commission. The immediacy of this compensation structure can create further incentive for the IAR to recommend certain annuity products over other products, or to recommend such products rather than recommending that these assets be included in and managed as part of the client's Asset Management Services portfolio. Clients of C1W are not obligated to utilize the insurance services provided by CreativeOne Marketing, LLC nor the IAR in his or her separate capacity as an insurance agent. The Firm does not require its IARs to solicit clients to purchase insurance products through CreativeOne Marketing Corporation or any other insurance broker.

C. Addressing Conflicts of Interest Related to Brokerage and Insurance Activities of IARs

C1W endeavors at all times to put the interest of clients first as part of its fiduciary duty. As such, the Firm takes the following steps to address these conflicts:

- C1W seeks to provide full and fair disclosure regarding the material conflicts of interest, including the potential for IARs and our affiliated companies to earn compensation from advisory clients in addition to C1W's advisory fees;
- C1W discloses to clients that they are not obligated to purchase recommended investment or insurance products from C1W's IARs or our affiliated companies;
- C1W seeks to collect, maintains and documents accurate and relevant client background information, including the client's financial goals, objectives and risk tolerance upon which recommendations are based;
- C1W requires that employees seek prior approval of any outside employment activity so that C1W may ensure that any conflicts of interests arising as a result of such activities are properly addressed and, as applicable, disclosed; and
- C1W periodically monitors these outside employment activities to verify that any conflicts of interest continue to be properly addressed by C1W;

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

The Firm has the discretion to choose third-party investment advisers to manage all or a portion of the C1W client's assets. We will be compensated via a fee share from the advisers to which we direct those clients. This relationship will be memorialized in each contract between C1W and each third-party adviser. This creates a conflict of interest in that we have an incentive to direct clients to the third-party investment advisers that provide us with a larger fee share. The Firm will act in the best interests of our clients, including when determining which third-party investment adviser to recommend. We will ensure that all recommended advisers are registered, notice filed, or exempt from registration in the state(s) in which the clients reside.

We refer clients to several custodians including Fidelity, Schwab and Betterment. See *Item 12 – Brokerage Practices* of this Brochure for further detail.

Other Sub-Advisers can also be utilized at the discretion of our IARs for accounts invested in the Adviser Select Program. A conflict of interest exists as the IAR may be selecting a Sub-Adviser based on the level of compensation. To mitigate this conflict, Sub-Advisers must be pre-approved by the Firm to ensure they meet our firm requirements. The Firm also conducts periodic reviews to ensure the Sub-Adviser's program is suitable for the client.

The Firm serves as an investment Sub-Adviser to the STAR™ Global Buy Write ETF (VEGA) managed by AdvisorShares Investments, LLC (ASI). In consideration of its services, the Firm receives a sub-advisory fee, for managing assets of the ETF, from ASI who receives the fees from the fund. In some situations, if the client portfolio includes the ETF, we also receive an investment management fee on the same assets directly from the client. This, along with the fact that client assets in the ETF help to reduce the cost in maintaining the ETF, constitutes a conflict of interest with the client in advising the client to invest in the ETF or using discretion to invest the clients' assets in the ETF.

The Firm will invest client assets in funds (including ETFs noted above) deemed appropriate. See *Item 5 – Fees and Compensation* and *Item 8 Methods of Analysis, Investment Strategies and Risk of Loss* of this Brochure for more details on the fees for holding these funds.

The Firm refers some clients to other programs, for which we are paid a portion of the investment management fee. Although each of these arrangements is disclosed to the client and we conduct reasonable due diligence on such third parties, there is a risk that the third party does not manage the clients' assets as expected, as we do not control the third party. See *Item 8 Methods of Analysis, Investment Strategies and Risk of Loss* of this Brochure for more details.

Item 11 - Code of Ethics, Participation/Interest in Client Transactions, Personal Trading

In accordance with SEC Rule 204a-1 of the Investment Advisers Act of 1940, the Firm maintains and enforces a Code of Ethics ("Code") that includes but is not limited to oversight of Gifts and Entertainment, Anti-Bribery Policy and Procedures, Political Contributions, Reporting of Employee Holdings and Transactions, Preclearance of Trades, Outside Business Activities and Insider Trading. The Code contains requirements regarding compliance with all Laws, Rules and Regulations, and it contains provisions for reporting violations of the Code to the Firm's CCO. All C1W employees and IARs are expected to be honest and ethical, make full and accurate disclosures, remain in compliance with all applicable rules and regulations, and be accountable for what they do.

The Firm and our IARs act as fiduciaries for our clients. We have a fundamental obligation to act in the best interests of our clients and to provide investment advice in the clients' best interest. We owe our clients a duty of undivided loyalty and utmost good faith. The Firm should not engage in any activity in conflict with the interest of any client, and we should take steps reasonably necessary to fulfill these obligations. The Firm and its IARs employ reasonable care to avoid misleading our clients and provide full and fair disclosure of all material facts to our current, former and prospective clients. Generally, facts are “material” if a reasonable investor would consider them to be important. They must disclose and mitigate all conflicts of interest that might incline them – consciously or unconsciously – to render advice that is not disinterested. If they do not avoid a conflict of interest that could impact the impartiality of their advice, they must make full and frank disclosure of the conflict. The Firm and its IARs cannot use our clients’ assets for our own benefit or the benefit of other clients. Departure from this fiduciary standard may constitute “fraud” under the Investment Advisers Act.

Recommendations Involving Material Financial Interests
The Firm can and does invest client assets in funds in which we and/or our IARs have material financial interests. We are a Sub-Adviser to an ETF (Ticker: VEGA). The fund pays AdvisorShares Investments, LLC (ASI) and then ASI pays C1WT

Investing Personal Money in the Same Securities as Clients
From time to time, an IAR may buy or sell securities for themselves that they also recommend to C1W clients. This may provide an opportunity for the IAR to buy or sell the securities before or after recommending the same securities to clients. This results in an IARs profiting from the recommendations they provide to clients. Such transactions create a conflict of interest. The Firm conducts best execution, trade allocation and trade confirmation audits to ensure IARs do not engage in trading that operates to the client’s disadvantage when similar securities are being bought or sold. The Firm utilizes block trading, when possible, to mitigate this conflict.

Trading Securities At/Around the Same Time as Clients’ Securities
From time to time, an IAR may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for the IAR to buy or sell securities before or after recommending securities to clients. This results in the IARs profiting from the recommendations they provide to clients. Such transactions create a conflict of interest; however, the Firm will never engage in trading that operates to the client’s disadvantage. If an IAR buys or sells securities at or around the same time as clients, the Firm utilizes block trading, when possible, to mitigate this conflict.

To review a copy of the Firm’s Code of Ethics, please make a written request to Firm’s CCO at compliance@creativeonewealth.com.

Item 12 - Brokerage Practices

A. Factors Used to Select Custodians and/or Broker-Dealers
Custodians/broker-dealers will be recommended based on the Firm’s duty to seek “best execution,” which is the obligation to seek execution of securities transactions for a client on the most favorable terms under the circumstances. This means the clients will not necessarily pay the lowest commission or commission equivalent, and we may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in our research efforts. We will never charge a premium or commission on transactions beyond the actual cost imposed by the broker-dealer/custodian.

The Firm recommends clients use any of the following custodians/broker-dealers:
- Schwab Institutional, a division of Charles Schwab & Co., Inc.
- Fidelity Brokerage Services, LLC (“Fidelity”)
- Betterment Securities

The Firm has no affiliation with any of the broker-dealers listed above.

The client is not obligated to effect transactions through any broker-dealer/custodian recommended by the Firm. However, if a recommended broker-dealer/custodian is not used, then we may not be able to assist the client in implementing its investment advice and may not be able to monitor the portfolio. This is mainly because our back-office systems receive electronic data from the recommended broker-dealer/custodians. Without this access it may not be practical or efficient to adequately manage the client's assets.

The Firm utilizes the services of Interactive Brokers for trades made on behalf of the STAR™ Global Buy-Right ETF (Ticker: VEGA). Market Makers are utilized, at times, when custom "baskets" are created or redeemed.

Services that generally benefit only us

Schwab or Fidelity also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology and business needs
- Consulting on legal and compliance related needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab and Fidelity provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab and Fidelity also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. [Schwab and Fidelity also provides us with other benefits, such as occasional business entertainment of our personnel.] If you did not maintain your account with Schwab or Fidelity, we would be required to pay for those services from our own resources.

Additional services we receive from Schwab

Schwab has also agreed to pay for certain technology, research, marketing, and compliance consulting products and services on our behalf. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions. The availability of these services from Schwab benefits us because we do not have to produce or purchase them and we do not have to pay for these additional services. The fact that we receive these services from Schwab is an incentive for us to recommend the use of Schwab rather than making such a decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate our recommendation of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "A.Factors Used to Select Custodians and/or Broker-Dealers") and not Schwab's services that benefit only us.

Research and Other Soft-Dollar Benefits

The Firm does not currently have any formal soft-dollar arrangements. The Firm may receive select consulting services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Said consulting services have included benchmarked studies of our firm's growth, cybersecurity assessments and consultations, and advice on firm acquisitions and mergers. Additionally, employees of the Firm and/or our IARs may be invited to conferences, summits, and other events (whether in-person or virtual) hosted by or underwritten by the broker-dealers/custodians. Reasonable travel, meal, and accommodation expenses may be offered by the broker-dealer/clearing firm to encourage attendance at these events. C1W will review in advance all expenses or reimbursements furnished by the broker-dealer/custodian to verify that there is not an impermissible conflict of interest that would otherwise unduly influence the attendee or prospective attendee to use the services of the broker-dealer/custodian to detriment of clients' best interest. There can be no assurance that any client will benefit from soft dollar benefits and whether or not the client's transactions paid for it. The Firm does not seek to allocate benefits to client accounts proportionate to any soft dollars generated by the accounts. The Firm benefits by not having to produce or pay for the services, and we have an incentive to recommend a broker-dealer based on receiving such services.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer in exchange for using that broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If the Firm buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. It should be noted that there can be multiple blocks for the same securities in a day. The average and allocation may not be among all blocks in a day. Each client that participates in the aggregated block order will participate at the average share price for all Firm transactions in that security with the particular custodian on a given business day, with transaction costs shared pro rata based on each client's participation in the transaction subject to rounding for odd lots that would be deemed too small for an account ("de minimis allocations"), and other objective criteria. We would determine the appropriate number of shares and select the appropriate brokers consistent with our duty to seek best execution, except for those accounts with specific brokerage direction (if any). When the total final execution amount of a trade is materially less than an amount of the requested order, certain accounts may be removed entirely from the list of participants and the amount of the allocation can be adjusted to avoid inefficient results. Accounts that do not receive an allocation with respect to a particular security will be considered first when the next partial fill occurs. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified if all client accounts receive fair and equitable treatment. We consider a client's choice to custody its account at a specific broker-dealer as being instruction to direct transactions in that client's account through that broker-dealer, unless the client notifies us otherwise.

IAR Managed (Adviser Select Program):

The IAR may aggregate the sale and purchase of orders for Adviser Select managed accounts with other client accounts that have similar orders being placed for execution at the same time. However, because Adviser Select accounts are managed per the client's investment needs, those accounts are typically not blocked and are instead executed in the order in which they are entered. As a result, there may be instances in which a trade for one account is placed in an account prior to another account transacting in the same security. As such, there may be a disparity in pricing between these accounts.

Potential Trading Conflicts

Smaller accounts are difficult to properly diversify and thus they may not get the same benefit as larger accounts or have greater divergence of their results from the intended portfolio allocation. Due to their smaller size, they may also incur a higher percentage of pro rata transaction costs as a percentage of assets under management.

Item 13 - Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts managed by the Firm are reviewed by the IAR servicing the account on a periodic and ongoing basis (no less than annually) with regard to the client's respective investment policies and risk tolerance levels.

The Firm's Compliance Team periodically reviews a sample of client accounts to ensure that selected investments are consistent with the client's investment objectives, time horizon, risk tolerance, investment experience, and other determinants of client suitability. When reviewing a client account where a conflict of interest exists (e.g., accounts where the "Total Rate Method" is employed as described in Item 5), special emphasis will be placed on assessing whether the IAR has invested the client's assets in the most appropriate portfolio(s). In the event the Firm determines that the IAR has placed his or her interests ahead of the client's (e.g., investing the client in a portfolio that impermissibly results in higher compensation for the IAR), we will, at a minimum, instruct the IAR to reinvest the client's assets in an allocation that eliminates the conflict of interest.

The Firm's Compliance Team also conducts annual risk-based exams, in-person or remotely, on a portion of our IARs and their branch offices. The Compliance Team uses a combination of risk factors, which may include an IAR's number of client households, their investment methodology and any industry-related disciplinary history.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Non-periodic reviews performed by the IAR may be triggered by, but is not limited to, material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, liquidation of a significant portion of the portfolio, physical move, or inheritance). The client should notify the Firm or their IAR if changes occur in their personal financial situation that might adversely affect the investment plan. Routine conversations between the Firm and the IAR may also trigger a non-periodic review of a client accounts.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of the Firm's advisory services will receive a quarterly report detailing the client's account, including assets held, asset value, and fees. This written report will come from the custodian. Additionally, IARs will engage in meetings with the clients, either by phone or in-person to review the account and client's financial goals. Financial planning clients may receive a written financial plan at the time of service. No ongoing reviews are conducted, or reports prepared for Financial Planning-only clients unless specifically noted within the Financial Planning Agreement signed by the client.

Item 14 - Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties

The Firm accepts compensation for providing client referrals. We will fully disclose to clients the details of any referral relationships.

Additionally, as described in *Item 10 – Other Financial Industry Activities and Affiliations* above, Principals and IARs of the Firm may receive compensation from other affiliates or non-affiliates. Such compensation shall only be received in conjunction with those services provided to such affiliates or non-affiliates.

The Firm refers some clients to certain employer-sponsored plan design and administrative firms. These independently provided programs generally provide for the design, implementation, compliance and annual review of defined contribution and/or defined benefit plans for individuals and groups. We may provide investment advice and/or financial planning to the plan sponsor and/or plan participants. The Firm does not receive any payment for these referrals.

C1W IARs are eligible to receive bonus payments from an insurance company for selling a targeted number of annuities during a specified period of time which creates a conflict of interest. These bonuses could include cash payments and/or qualification for networking and business trips. These benefits are not a result of achieving sales quotas related to specific product lines. However, these incentives present a conflict of interest which C1W addresses by providing disclosures and applying the firm’s fiduciary obligation to each client.

C1W IARs, acting in their separate capacities as insurance agents, receive commissions and other incentive awards for the recommendation/sale of annuities and other insurance products. The receipt of commissions and additional compensation itself creates a conflict of interest. Due to the non-fiduciary capacity the IARs are acting in as insurance agents outside of an advisory recommendation, this can impact the insurance products they select when making recommendations. Again, as stated above, because insurance agents are not subject to the same rules and regulations that apply to IARs, C1W does not supervise or conduct oversight of the insurance agent activity.

At times, IARs receive expense reimbursement for travel and/or marketing expenses from product sponsors. Travel expense reimbursements are a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are the result of informal expense sharing arrangements in which product sponsors will underwrite costs incurred for marketing, such as client appreciation events, advertising, publishing, and seminar expenses. Although receipt of these travel and marketing expense reimbursements are not predicated upon specific sales quotas, the product sponsor reimbursements are made by those sponsors for which sales have been made or for which it is anticipated sales will be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of clients. C1W attempts to mitigate conflicts by basing investment decisions on the individual needs of clients.

Certain IARs may charge prospective clients fees to attend educational seminars or workshops covering topics such as investment strategies or retirement planning. These fees, which vary by IAR, are assessed to cover event costs and are separate from the Asset Management Services fees outlined in the DIMA, applicable only to clients.

B. Strategic Sponsors

C1W receives compensation from certain third-party product providers or sponsors (“Strategic Sponsors”) for providing marketing support services relating to the sponsor’s product(s). Our Strategic Sponsors include a variety of investment-related companies who provide products available through C1W, including mutual funds, exchange-traded funds, and model portfolios. C1W’s marketing support may include providing access to certain information about our business and the opportunity to have more frequent interactions with our IARs through training, marketing support, and educational presentations for the purpose of relationship building and increasing familiarity with their product. Those product sponsors not given this designation may receive similar treatment. These payments are typically calculated as a fixed fee or as an annual percentage of the amount of assets invested in the product and will vary with each Sponsor based upon the agreement between the Sponsor and C1W. This revenue helps fund the cost of providing services, maintaining accounts, and offering an investment platform for our clients. Strategic Sponsors pay C1W out of their own assets, revenues, or earnings, and there is no additional charge to you. We want you to understand that C1W’s receipt of payments on assets within specific investment advisory programs or products creates an inherent conflict of interest for C1W. These payments provide an incentive for C1W to favor products from Sponsors that pay over other products. None of the revenue-sharing payments are paid to the IAR who recommends these products to you. As a result, your IAR does not have any financial incentive to recommend a product to you based on C1W's receipt of revenue-sharing and is required by regulation and C1W policy to make recommendations solely in your best interest. However, the marketing and educational activities paid for by the Sponsor could lead the IAR to focus more on those products offered by the Sponsor. Regardless, product recommendations to any customer are required to meet the firm's fiduciary obligation to each client. For additional information on a particular Strategic Sponsor, please review the Sponsor's statement of additional information or ADV 2A Firm Brochure. A full list of our Strategic Sponsors may be found at our website.

C. Client Referrals

We may compensate promoters or other third parties for promoting our advisory services. Any such compensation creates a conflict of interest because the promoter has a financial incentive to recommend our firm. When we use a promoter, we enter into written agreements with compensated promoters and provide the disclosures required by the Marketing Rule, including whether the promoter is a client, the nature of any compensation provided, and material conflicts of interest.

D. Compensation to Non – Advisory Personnel for Client Referrals

The Firm enters into written arrangements with third parties to act as promoters for our investment management services. Promoter relationships will be fully disclosed to each client to the extent required by applicable law. In the instance where the Firm receives a client referral from a promoter, we will pay a cash referral fee to the promoter . T

Under these circumstances, the Firm will enter into a promoter's agreement with the other party. All such agreements will be in writing and follow the applicable state and federal regulations. While the specific terms of each agreement may differ, the compensation agreed upon, as disclosed in the promoter acknowledgement, shall be paid by the adviser until the account is closed by written authorization from the client. Any such fee shall not result in any additional charge to the client.

E. Forgivable Loans

From time to time, C1W provides certain Investment Adviser Representatives with forgivable loans. These loans are typically offered in connection with the IAR joining C1W and are intended to help transition client accounts and support the growth of the IAR's advisory practice. The terms of these loans generally provide that some or all of the outstanding balance may be forgiven over a specified period, subject to the IAR's continued affiliation with the Firm and compliance with applicable agreements.

These arrangements create a potential conflict of interest because they provide a financial incentive for the IAR to remain affiliated with C1W and to recommend that clients maintain accounts with C1W in order to continue receiving loan forgiveness. Clients should carefully consider this potential conflict when evaluating the advisory services provided by their IAR.

Item 15 – Custody

It is not the Firm's intent to take physical possession of or custody clients' assets. However, we are deemed to have custody by virtue of two situations:

1. The Firm's ability to deduct asset management fees directly from clients' accounts.

2. The Firm's authority to transfer client assets based on agreements established between some clients and the custodian.

We instruct clients to maintain their assets with qualified custodians which send statements directly to clients at a minimum of a quarterly basis. We urge clients to compare the account statements from the qualified custodian to any report provided by C1W and notify us and the custodian if you believe there is any error.

The Firm does manage assets for some variable annuity accounts that are custodied with insurance companies.

Item 16 - Investment Discretion

The Firm and its IARs have discretion over the selection and number of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client (although some clients elect a non-discretionary basis whereby the client either approves each trade prior to the IAR placing the trade, or the client executes trades on their own behalf).

The granting of discretionary authority will be evidenced by the client's execution of a Discretionary Investment Management Agreement (DIMA), containing all applicable limitations to such authority. Discretionary trades executed by the Firm will be in accordance with each client's investment objectives and goals.

A client may request restrictions, limitations, or other requirements with respect to their investment accounts. The Firm can accept or deny the request, as it may impede our ability to efficiently manage the assets and provide services to the client. Any restrictions requested by the client and accepted by the Firm are documented in the DIMA which is signed by the client. The Firm may also use discretion in the methods used to effectuate trades for clients. See *Item 12 – Brokerage Practices* of this Brochure for more detail.

A client may also elect to not have all their personal brokerage accounts, held at a Custodian, be managed by C1W but recognizes the value of the C1W Platform's centralized reporting abilities for Account Information. These reporting only accounts may be identified in C1W's non-managed account agreement or removed from billing. C1W does not manage or provide investment recommendations and is not responsible for the investments in accounts identified as reporting only or non-managed assets.

If a client elects financial planning, investment consultative retainer services and/or retirement consulting services. C1W may provide recommendations related to the assets that you identified but will not be responsible for the management and discretion of assets unless directed by the client to do so.

The Firm does not advise or take any action on behalf of clients in any legal proceedings, including bankruptcies or class actions, involving securities held or formerly held in client accounts or the issuers of those securities.

Item 17 - Voting Client Securities

It is The Firm's policy is that we do not vote proxies for clients. However, there are some situations when we will vote proxies on behalf of a client:

1. With some ERISA accounts, the Firm may vote proxies if the trustee provides written permission or if the Investment Advisory Agreement states that the advisor will vote proxies.
2. Under C1W's Sub-Advisory Agreement(s), the Firm may be responsible for reviewing proxy solicitation materials or voting and handling proxies in relation to the securities

held as assets.

3. The Firm will vote proxies for assets maintained in funds sub-advised by us (e.g., VEGA) in accordance with the requirements of the Sub-advisory Agreement between the Firm and the fund's investment advisor.

If the Firm does vote proxies, we will use reasonable discretion to vote in the best interests of our clients. For more information on the Firm's proxy voting policies and procedures, or on how a proxy was voted, you may contact Compliance at compliance@creativeonewealth.com or 913-402-7897.

Item 18 - Financial Information

The Firm does not require or solicit pre-payment of more than $1,200 in fees per client, six months or more in advance. The Firm has no financial condition that impairs our ability to meet contractual commitments to clients. The Firm has not been the subject of a bankruptcy petition.