

A Summary of Your Advisory Relationship with Transform Wealth and Weatherstone Capital Management

Introduction: Transform Wealth, LLC (“Transform Wealth”) is registered with the U.S. Securities and Exchange Commission (SEC) as an investment adviser. Fees for brokerage and investment advisory services differ and it is important for you to understand the differences. Transform Wealth is a fee-only firm. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisors and investing.

<p>What investment services and advice can you provide me?</p>	<p>We are a fee-only Registered Investment Advisory firm offering Investment Advisory Services, Financial Planning Services and Consultation Services. We provide ongoing and continuous monitoring of your portfolio. We are a Discretionary Advisor, meaning you authorize us to make decisions regarding the purchase and sale of investments in your portfolio when you sign an investment advisory agreement. In some instances, we are a Non-Discretionary Advisor where you retain the ultimate decision regarding the purchase or sale of investments. You may impose reasonable restrictions on your account or request us to exclude certain securities.</p> <p>We require a minimum initial account size, although exceptions may be granted with management approval. We also provide financial planning services which includes reviewing your current goals, assets and investment holdings on a periodic or one-time basis. Weatherstone also acts as a sub-advisor in wrap-fee programs through third-party sponsors. Please see our <u>ADV Part 2A Brochure, Item 4 and 7</u>, for more information.</p>	<p>You are encouraged to ask us questions, including the following, to help you better understand our services:</p> <ul style="list-style-type: none"> • <i>Given my financial situation, should I choose an investment advisory service? Why or why not?</i> • <i>How will you choose investments to recommend to me?</i> • <i>What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?</i> • <i>What is included in a financial plan?</i>
<p>What fees will I pay?</p>	<p>We offer investment and financial planning services on a fee only basis. Your quarterly investment advisory fee is based on the total assets we manage for you, as more fully described in <u>Item 5 of our ADV Part 2A Brochure</u>. You should be aware that the more assets in your account, the more you will pay in fees, therefore we have an incentive to grow your assets and encourage you to increase your assets in your account. In addition to our fees, you may incur additional fees and costs from 3rd parties related to the investments in your account, such as custodian fees, account maintenance fees, transaction costs, wire transfer fees, electronic fund fees, and internal management fees of open-end mutual funds and exchange-traded funds which are distinct and different from our advisory fees.</p> <p>You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.</p>	<p>Please ask us questions, including the following, to better understand the impact of fees and costs on your investments:</p> <ul style="list-style-type: none"> • <i>Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?”</i> • <i>How much does a financial plan cost? Is it a one time or ongoing fee?</i>

<p>What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?</p>	<p>When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means:</p> <ul style="list-style-type: none"> • Weatherstone receives client referrals from third parties to whom we pay referral fees. This is a conflict of interest because we have an incentive to pay referral fees so that the third parties will refer clients to us that they otherwise might not refer to us. • We are fiduciaries to you. This means we are required to act in your best interest throughout our entire advisory relationship. <p>For more information on conflicts of interest, please refer to our <u>ADV Part 2A, particularly items 10, 11, and 12.</u></p>	<p>Ask us questions to better understand our conflicts of interest:</p> <ul style="list-style-type: none"> • <i>How might your conflicts of interest affect me, and how will you address them?</i>
<p>How do your financial professionals make money?</p>	<p>Our financial professionals are compensated on a salary and discretionary bonus based on their individual performance and success of the firm. Financial professionals who were previous owners receive “earn out” compensation from our parent company, Focus Financial Partners, LLC (or one of its affiliates). Financial professionals sometimes receive compensation based on revenues generated. This compensation is considered a conflict of interest because it incentivizes the financial professional to encourage you to increase the size of your investment account with us. Please request a copy of your financial adviser’s Form ADV, Part 2B Brochure for more information on his or her compensation.</p>	<p>The following is a question you may wish to ask us to better understand compensation for financial professionals:</p> <ul style="list-style-type: none"> • <i>What other forms of compensation are common in the advisory business?</i>
<p>Do you or your financial professionals have legal or disciplinary history?</p>	<p>No, please visit Investor.gov/CRS for a free and simple search tool to research our firm and its financial professionals.</p>	<p>You are encouraged to ask us questions including the following to help you better understand our disciplinary history:</p> <ul style="list-style-type: none"> • <i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i>
<p>Additional information</p>	<p>Please refer to our <u>Form ADV, Part 2A Brochure</u> for more information about our services. You may request updated information and a copy of our Relationship Summary by contacting us at 303.741.2560 or by emailing markr@transformwealth.com.</p>	<p>You are encouraged to ask us questions including the following:</p> <ul style="list-style-type: none"> • <i>Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?</i> • <i>Who can I talk to if I have concerns about how this person is treating me?</i>

TRANSFORM WEALTH

CLIENT BROCHURE

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

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

Additional information about Transform Wealth, LLC is also available on the SEC's web site at www.adviserinfo.sec.gov.

The firm's CRD number is: 283403 and SEC number is: 801-107796

Web site: www.transformwealth.com

May 22, 2024

ITEM 2: Material Changes

Our most recent updated amendment was filed on September 29, 2023.

On August 31, 2023, investment vehicles affiliated with Clayton, Dubilier & Rice, LLC (“CD&R”) and Stone Point Capital LLC (“Stone Point”) indirectly acquired Focus Financial Partners Inc. (“Focus Inc.”). This transaction resulted in investment vehicles affiliated with CD&R collectively becoming majority owners of Focus Financial Partners, LLC (“Focus LLC”) and investment vehicles affiliated with Stone Point collectively becoming owners of Focus LLC. Because Transform Wealth is an indirect, wholly-owned subsidiary of Focus LLC, the CD&R and Stone Point investment vehicles are indirect owners of Transform Wealth. Items 4 and 10 have been revised to reflect this new ownership structure.

Our affiliate, Focus Treasury & Credit Solutions, LLC (“FTCS”) was acquired by UPTIQ, Inc. and has been renamed UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, “UPTIQ”). We have revised the information concerning FTCS to describe our new arrangement with UPTIQ. Further information on this conflict of interest is available in Items 4, 5, and 10 of this Brochure.

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ITEM 4: Advisory Business

A. Advisory Firm Description

Transform Wealth, LLC (“Transform Wealth”), is a fee-only investment advisory firm. Transform Wealth has been providing advisory services (through it and its predecessor) since 2011.

Transform Wealth is a fee only, fiduciary advisor meaning we are required to act in your best interest and not place our own interests ahead of yours. Our commitment is to:

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

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

Transform Wealth is managed by Nathan Kubik and David Kubik (“Transform Wealth Principals”), pursuant to a management agreement between C & K Management, LLC (“C&K”) and Transform Wealth. The Transform Wealth Principals serve as officers of Transform Wealth and are responsible for the management, supervision and oversight of Transform Wealth.

Focus Financial Partners

Transform Wealth is part of the Focus Financial Partners, LLC (“Focus LLC”) partnership. Specifically, Transform Wealth is a wholly-owned indirect subsidiary of Focus LLC. Focus Financial Partners Inc is the sole managing member of Focus LLC. Ultimate governance of Focus LLC is conducted through the board of directors at Ferdinand FFP Ultimate Holdings, LP. Focus LLC is majority-owned, indirectly and collectively, by investment vehicles affiliated with Clayton, Dubilier & Rice, LLC (“CD&R”). Investment vehicles affiliated with Stone Point Capital LLC (“Stone Point”) are indirect owners of Focus LLC. Because Transform Wealth is an indirect, wholly-owned subsidiary of Focus LLC, CD&R and Stone Point investment vehicles are indirect owners of Transform Wealth.

Focus LLC also owns other registered investment advisors, broker-dealers, pension consultants, insurance firms, business managers and other firms (the “Focus Partners”), most of which provide wealth management, benefit consulting and investment consulting services to individuals, families, employers, and institutions. Some Focus Partners also manage or advise limited partnerships, private funds, or investment companies as disclosed on their respective Form ADVs.

B. Types of Advisory Services

Transform Wealth is a fee-only Registered Investment Advisory firm that offers Wealth Management, Financial Planning Services and Consultation Services.

Transform Wealth offers a complimentary initial consultation to discuss services available, to give a prospective Client the opportunity to review services desired, and to determine the possibility of a potential relationship. Services begin only after the Client and Transform Wealth formalize the relationship with a properly executed Client agreement.

Transform Wealth implements investment advice on behalf of certain clients in held-away accounts that are maintained at independent third-party custodians. These held-away accounts include 401(k) accounts, 529 plans and other assets that are not held at our primary custodian(s).

Transform Wealth is a fiduciary under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) with respect to investment management services and investment advice provided to ERISA plans and ERISA plan participants. Transform Wealth is also a fiduciary under section 4975 of the Internal Revenue Code of 1986, as amended (the “IRC”) with respect to investment management services and investment advice provided to individual retirement accounts (“IRAs”), ERISA plans, and ERISA plan participants. As such, Transform Wealth is subject to specific duties and obligations under ERISA and the IRC, as applicable, that include, among other things, prohibited transaction rules which are intended to prohibit fiduciaries from acting on conflicts of interest. When a fiduciary gives advice, the fiduciary must either avoid certain conflicts of interest or rely upon an applicable prohibited transaction exemption (a “PTE”).

Wealth Management Services

Transform Wealth offers wealth management services that include ongoing and continuous portfolio management depending on the services desired, as outlined in the Investment Management Agreement.

Transform Wealth tailors its wealth management services and recommendations to meet the needs of its individual Clients by assessing Client stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the Client and the nature of services requested. Transform Wealth anticipates that each Client will actively participate in the review of information and the formulation of their investment plan.

Transform Wealth places a focus on liquidity, diversification, risk analysis and cash flow through the use of investments primarily available through nationally-recognized security exchanges.

The portfolio strategies considered for use by Transform Wealth include individual equity securities (foreign and domestic), bonds, ETFs, no-load mutual funds, corporate debt securities, commercial paper, Certificates of Deposit, municipal securities, government debt securities (foreign and domestic), real estate (private and public), partnership (using a Fund of Funds) investments, private equity and credit and other securities, or a combination thereof. Transform Wealth also offers advice on the following: warrants; certificates of deposit; option contracts on securities and commodities; and investments in variable life or annuity products. Transform Wealth also offers advice on partnerships (public and private).

For Clients with non-discretionary investment management agreements with us, implementation of any advice or recommendations pertaining to securities and/or non-securities matters – in whole or in part – is entirely at the Client’s discretion.

Where an existing portfolio has been designed by the Client or another party, Transform Wealth can provide recommendations for ongoing management, re-design, adjustments or rebalancing.

Certain Clients may desire to keep holdings within their account(s) that are selected by the Client and are not the subject of investment advice by Transform Wealth. These are self-directed assets. Transform Wealth will have no responsibility to manage any self-directed assets in Client accounts and Transform Wealth accepts no liability to those Clients in connection with any loss relating to self-directed assets.

Clients requiring assistance on issues relating to matters outside of investment advisory topics should consult their personal tax adviser, legal counsel, or other professionals for expert opinions.

When providing a review or advice on investments within ERISA retirement plans, the advice and any recommendations are limited to plan offerings and the service provider(s) selected by the plan providers.

If services desired go outside the scope of Wealth Management Services during the engagement, Transform Wealth is available to provide Consultation Services. In such cases, Transform Wealth will request a new or amended Client Agreement and additional fees will apply. Transform Wealth will not engage in additional services without the Client’s written direction.

C. Selection of Other Advisers

In limited instances, when Transform Wealth allocates Client assets to External Advisers, the Client-facing adviser, is responsible for assessing the Client’s needs, communicating with the client, allocating (or recommending the allocation of) the Client’s assets and conducting due diligence and monitoring of the Client’s investments. The External Adviser is responsible for managing certain of the Client’s assets that we allocate to them in a manner consistent with the manager’s stated investment strategies and in accordance with the guidelines we provide.

D. Financial Planning & Financial Assessment Services

Financial Planning & Financial Assessment Services are dependent upon the nature and scope of services to be provided. Transform Wealth’s services and the fee for those services are agreed to with the Client at the time of engagement.

Transform Wealth undertakes two general approaches for providing written Financial Planning and Financial Assessment Services:

1. A “Comprehensive Financial Plan,” which reviews all of the various aspects of a Client’s situation as presented by the Client, which may include, but are not limited to: individual needs, finances, goals and objectives, time horizons and risk tolerance, business activities, taxes, estate planning, insurance, educational funding, budgeting, retirement and more. This Comprehensive Financial Plan includes the data gathering process through a comprehensive Client Workbook, actual presentation of the written Plan, and ongoing consultation services regarding the implications and recommendations provided. Ongoing consultation services are typically provided in conjunction with regular investment portfolio reviews; however, if a Client experiences significant changes in their circumstances or requires more comprehensive updates, the Client may need to re-engage Transform Wealth under a new planning agreement.
2. A “Focused Financial Assessment” typically includes a simplified, limited scope analysis covering basic cash flow and net worth projections. Transform Wealth collects data using a brief Financial Assessment questionnaire. Because of time and project limitations, the Client’s overall financial situation will not be considered. The Focused Financial Assessment is typically provided for Clients utilizing Transform Wealth for their wealth management needs. If desired, Clients can secure Comprehensive Financial Planning services under a separate agreement.

When Clients utilize our combined Comprehensive Financial Planning and Wealth Management services, we will reach out to them quarterly to encourage a discussion about their investment portfolios. At the same time, we will also address their ongoing planning needs. We encourage our Clients to contact us immediately if they experience any significant life events that could alter the assumptions of their financial plan.

E. Consultation Services

Transform Wealth’s business consulting services are focused on individuals and families who manage their own business. We will work to understand the unique and complex aspects of your business operations with a holistic view of your financial situation. These services are offered outside of the Transform Wealth’s Financial Planning and Wealth Management Services for a fee.

F. Client Tailored Services and Client Imposed Restrictions

Transform Wealth recognizes that each Client is unique, and therefore, Transform Wealth focuses on providing individualized services. Transform Wealth can tailor services to each Client and their specific situation based on the nature of the engagement. Clients electing to receive limited services should understand that Transform Wealth will not have sufficient information to perform a comprehensive analysis of their long-term financial goals and objectives.

Clients can impose reasonable restrictions on the management of their portfolios if Transform Wealth determines in its sole discretion that the conditions can be accommodated. Clients are advised to promptly notify Transform Wealth in writing if there are changes in their personal or

financial situation, needs, goals, or objectives, and if they wish to place any limitations on the management of their portfolios.

G. UPTIQ Treasury & Credit Solutions

We offer Clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc and its affiliates, "UPTIQ"). Please see Items 5 and 10 for a fuller discussion of these services and other important information.

H. Wrap Fee Programs

Transform Wealth does not offer wrap fee programs; however, wrap fee programs are available through Weatherstone Capital Management.

I. Assets Under Management

As of December 31, 2023, Transform Wealth had discretionary assets under management of \$2,506,767,328 and non-discretionary assets of \$7,539,291 for a total of \$2,514,306,619.

ITEM 5: Fees and Compensation

A. Fees & Compensation

Transform Wealth offers services on a fee basis, which include fees based on assets under management, fixed fees, and/or hourly fees. Transform Wealth's fees are negotiable at its own discretion. Fees will vary for legacy Clients and in some instances are waived for family and friends of the firm.

For certain Clients, we charge an advisory fee for services provided to the held-away accounts mentioned above in Item 4, just as we do with Client accounts held at our primary custodians. The specific fee schedule charged by us is provided in the Client's investment advisory agreement with us.

B. Wealth Management Services and Selection of Other Services

Fees for Wealth Management Services are agreed upon at the time of engagement. The fee schedule that follows are annual fees which are billed in accordance with the written investment advisory agreement executed between the Client and Transform Wealth. Services can be combined on a household level, generally defined as Clients related on a familial basis, which will save Clients fees compared to purchasing the same services separately.

Fees for Wealth Management Services are billed in advance and are as follows:

<u>Annual Fee Structure</u> <u>for assets over \$500,000</u>	<u>Annual Fee</u>
Up to \$1,000,000	1.25%
The Second \$1,000,000	1.10%
Over \$2,000,000	1.00%

Clients with less than \$500,000 assets under management will be assessed a 1.50% annualized fee.

Fees and expenses for partnership offerings and private REITs are disclosed in applicable offering documents. In addition, specific fees and risks are disclosed below in Item 8.

C. Financial Planning Services

Fees for Financial Planning Services are determined at the time of engagement based upon the time and effort required and/or the nature and complexity of services and are negotiable at Transform Wealth's discretion.

Comprehensive Financial Planning services are available to Clients with a minimum of \$1,000,000 in assets with Transform Wealth. We do make some exceptions to the asset minimum. There is typically no charge for Financial Assessment services, as these costs are covered by the Client's wealth management fees.

For larger projects and when ongoing services are desired, Transform Wealth will propose a fixed fee, agreed upon at the time of engagement, and dependent upon the complexity of the desired services. Any modifications to the fee arrangement will be agreed upon in writing between Transform Wealth and the Client.

Financial Planning Services will be immediately terminated upon written notice by either party, and planning fees may be refunded at the discretion of Transform Wealth depending on the degree to which planning services have been utilized.

D. Payment of Fees

Wealth Management Services

Wealth Management fees are payable either in arrears or in advance, depending on the advisory agreement executed by the Client. For Clients who are billed quarterly in arrears, fees are typically prorated and paid quarterly, based upon the market value of the assets on the last business day of the current quarter. For Clients who are billed quarterly in advance, fees are typically paid quarterly, based upon the market value of the assets on the last business day of the previous quarter. The fees based on assets under management are calculated as a percentage based on the value of all assets in the account, including cash, accrued interest, accrued dividends and securities purchased on margin. Transform Wealth will generate quarterly advisory fee invoices upon Client request; however, all Clients will receive quarterly custodian statements with the deduction of advisory fees.

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

Clients should refer to their investment advisory agreement for the billing methodology applicable to their account(s).

Transform Wealth typically deducts advisory fees from Client accounts held at an independent custodian, as allowed under the safe harbor provisions of the SEC's Custody Rule.

Account statements are required to be produced and sent to you by the account custodian no less frequently than on a quarterly basis. Transform Wealth encourages you to compare your custodial account statements with your Transform Wealth quarterly reports. In the event of a valuation discrepancy, the custodial statement will serve as the official statement.

E. Financial Planning

Financial Planning fees are invoiced directly and paid by the Client.

F. Other Fees

Clients are responsible for the payment of all third-party fees associated with investing. Clients pay internal management fees and expenses of open-end mutual funds and exchange-traded funds, transaction and brokerage commissions for certain securities transactions to their broker/dealer or custodian as well as any fees associated with their particular accounts (e.g., wire transfer, margin fees, etc), all which are distinct and different from Transform Wealth's advisory fees. The commissions and/or transaction fees charged by broker/dealers or custodians available through Transform Wealth may be higher or lower than those charged by other broker/dealers. The commissions and/or transaction fees you pay are considered to be discounted from customary retail transaction charges and commission rates. Transform Wealth does believe these charges comply with its duty to seek best execution and they are reasonable in relation to the quality of brokerage services received. Transform Wealth does not receive any portion of these investment-related commissions and/or fees. Clients are encouraged to read each prospectus and securities offering document.

When transferring securities to Transform Wealth, Clients should understand they are responsible for any liquidation or transfer fees charged by the custodian.

G. Prepayment of Fees

Wealth Management Services can be terminated upon receipt of written notice by either party. If

the termination occurs prior to the end of a billing period, fees paid in advance for the final billing period are considered to be earned through the effective date of the termination date. Any unearned portion of the fee paid in advance will be refunded to the Client. Fees paid in arrears will be billed to the Client through termination date.

Consultation Services terminate upon the delivery of services, unless ongoing services are engaged pursuant to the Client Agreement. These services otherwise can be immediately terminated prior to the conclusion of services upon written notice from either party and the Client will only be responsible for time incurred by Transform Wealth up until the effective date of termination. Any unearned portion of fees will be promptly refunded.

H. Other Compensation

Neither Transform Wealth nor its employees accept any compensation and/or commission for the recommendation of securities or non-securities products, including asset-based sales charges or service fees from the sale of mutual funds or insurance products to advisory Clients.

I. UPTIQ Treasury & Credit Solutions

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, "UPTIQ"). Focus Financial Partners, LLC ("Focus") is a minority investor in UPTIQ, Inc. UPTIQ is compensated by sharing in the revenue earned by such third-party financial institutions for serving our clients. Although the revenue paid to UPTIQ benefits UPTIQ Inc.'s investors, including Focus, our parent company, no Focus affiliate, including Transform Wealth, will receive any compensation from UPTIQ that is attributable to our clients' transactions. Further information on this conflict of interest is available in Item 10 of this Brochure.

ITEM 6: Performance-Based Fees and Side-By-Side Management

Transform Wealth does not have any performance-based fee clients.

ITEM 7: Types of Clients

Transform Wealth provides advisory services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, corporations and business entities.

Transform Wealth requires a minimum portfolio size of \$500,000 for its Wealth Management Services although exceptions may be granted upon management approval. For Clients who do not meet the minimum portfolio size or who do not desire comprehensive Wealth Management Services, Transform Wealth also offers Consultation and Financial Planning Services.

Transform Wealth reserves the right to decline to provide Wealth Management Services to any

person or firm in its sole discretion and for any reason.

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

A. Methods of Analysis and Investment Strategies

Transform Wealth believes each Client presents a unique set of goals, values, objectives and challenges. Transform Wealth provides individualized attention to each type of investor who engages its services.

Transform Wealth provides advisory services for portfolios ranging from conservative to aggressive; each designed to meet the varying needs of Clients based upon their specific objectives, risk tolerance and time horizons.

During the process of financial planning or consultation, Transform Wealth may recommend its services, and/or the services of other professionals to implement its recommendations. Any professional referrals (i.e., insurance agents/firms, accounting professionals, legal professionals, etc.) are solely a courtesy and Transform Wealth receives no direct or indirect compensation as a result of these referrals. The Client is never under any obligation to act upon any of the recommendations made by Transform Wealth under a consulting engagement and/or engage the services of any such recommended professional.

Transform Wealth utilizes a combination of fundamental, technical and cyclical analysis while employing an asset allocation strategy that incorporates cash flow considerations, current and future financial obligations, risk perceptions, time horizon and investment objectives. Transform Wealth takes the position that no single strategy can be relied upon to outperform the market. Transform Wealth's goal in its analysis is not to make any attempt to time the market.

When appropriate and based on the individual needs of Clients, Transform Wealth may utilize covered puts and calls as a hedging strategy to help manage risk. Where Client accounts are of a smaller size, however, this strategy may not be available.

Transform Wealth utilizes a number of computer databases and research available to professional investment advisers. Additionally, outside consultants may be engaged to provide professional services, statistical reports, tax alerts and investment reviews. Any costs associated with these consultations is borne solely by Transform Wealth unless other arrangements have been made, in writing, with the Client in advance.

Typically, sales of investments in taxable accounts result in taxable gains or losses to the Client. Transform Wealth does not render tax advice and is not responsible for the tax consequences to the Client as a result of account transactions. Clients are encouraged to consult their tax advisor about tax consequences as a result of transactions in their account(s).

In providing Financial Planning Services, Transform Wealth takes a long-term perspective. After Transform Wealth evaluates the Clients' financial needs, the Advisor will design investment and risk-management strategies to help the Client achieve his or her financial goals.

B. Risk of Loss

Transform Wealth believes that investors with diverse portfolios are optimally positioned for better long-term performance, because it is difficult to accurately predict short-term movements of the markets. No single strategy can be relied upon to outperform the market.

Investing in securities involves risk of loss that Clients should be prepared to bear. It is important that Clients understand these risks and they proactively address any concerns with their Advisor.

Market Risks

Investment decisions can depend largely upon correctly assessing the future course of price movements of stocks, bonds and other asset classes. There can be no assurance that Transform Wealth will be able to predict those price movements accurately or capitalize on any such assumptions.

Certain investments utilized by Transform Wealth may contain securities from emerging markets and developing countries. Investing outside the United States involves additional risks, such as currency fluctuations, illiquidity and price volatility.

Mutual Funds and Exchange-Traded Funds (ETFs)

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

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

Use of Margin

Margin lending is a feature where a custodian will lend a Client money against the value of their portfolio securities. The borrowed money is called a margin loan and can be used to purchase additional securities or to meet short-term financial needs. Margin can be profitable when stocks prices increase although financial risk to the Client can be significant when stock prices decline. Clients should carefully read their custodian margin agreement to fully understand the risks associated with margin lending.

Cybersecurity

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

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches can cause disruptions and impact business operations, potentially resulting

in financial losses to a Client; impediments to trading; the inability by us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information.

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

Fixed Income Risk

There are certain risks involved in investing in all types of bonds: Government, Municipal, Mortgage-backed, Asset-backed securities (MBS/ABS) and Corporate. These risks can include interest rate risk, reinvestment risk, inflation risk, market risk, price risk, credit risk, default risk and duration risk.

Limited Partnership / Private Real Estate Investment Trust Risks

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

Real Estate Income Trust Risks

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

- Liquidity risk, as non-traded REITs generally cannot be sold until listed on an exchange or the trust's assets are liquidated. Early redemptions may be subject to limitations including notice requirements, termination of redemption provisions, and discounted redemption values.
- Non-traded REITs can include high upfront fees which are generally designed to cover offering and organizational costs. These early, high fees reduce the value of the principal invested and results in less return on investment. In addition, non-traded REITs can involve significant transaction costs including fees to acquire properties and asset management fees.
- Distributions from non-traded REITs, particularly initial distributions, may be derived from investment principal rather than operations. This practice reduces the value of the shares and reduces the cash available to the REIT to purchase real estate assets.

- Lack of available share price for non-traded REITs, which may limit or eliminate the ability to assess the value or performance of the investment for significant time periods.
- Conflicts of interest risks, including external managers that may receive significant transaction fees by the REIT for services that do not align with shareholder interests, such as fees based on the amount of property acquisitions and assets under management.

Credit Risk

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

Market Volatility

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

ITEM 9: Disciplinary Information

Transform Wealth and its employees have not been the subject of any investment-related legal or disciplinary events in the past ten years that would be material to a Client's evaluation of Transform Wealth.

ITEM 10: Other Financial Industry Activities and Affiliations

Focus Financial Partners

As noted above in response to Item 4, certain investment vehicles affiliated with CD&R collectively are indirect majority owners of Focus LLC, and certain investment vehicles affiliated with Stone Point are indirect owners of Focus LLC. Because Transform Wealth is an indirect, wholly-owned subsidiary of Focus LLC, CD&R and Stone Point investment vehicles are indirect owners of Transform Wealth.

UPTIQ Credit and Cash Management Solutions

We offer clients the option of obtaining certain financial solutions from unaffiliated third-party financial institutions through UPTIQ Treasury & Credit Solutions, LLC (together with UPTIQ, Inc. and its affiliates, "UPTIQ"). These third-party financial institutions are banks and non-banks that offer credit and cash management solutions to our clients, as well as certain other unaffiliated third parties that provide administrative and settlement services to facilitate UPTIQ's cash management solutions. UPTIQ acts as an intermediary to facilitate our clients' access to these credit and cash management solutions.

We are a wholly owned subsidiary of Focus Financial Partners, LLC ("Focus"). Focus is a minority investor in UPTIQ, Inc. UPTIQ is compensated by sharing in the revenue earned by such third-party financial institutions for serving our clients. Although the revenue paid to UPTIQ benefits UPTIQ Inc.'s investors, including Focus, no Focus affiliate, including Transform Wealth, will receive any compensation from UPTIQ that is attributable to our clients' transactions.

For services provided by UPTIQ to clients of other Focus firms and when legally permissible, UPTIQ shares a portion of this earned revenue with our affiliate, Focus Solutions Holdings, LLC ("FSH"). Such compensation to FSH is also revenue for FSH's and our common parent company, Focus. This compensation to FSH does not come from credit or cash management solutions provided to any of our clients. However, the volume generated by our clients' transactions allows Focus to negotiate better terms with UPTIQ, which benefits Focus. We mitigate this conflict by: (1) fully and fairly disclosing the material facts concerning the above arrangements to our clients, including in this Brochure; and (2) offering UPTIQ's solutions to clients on a strictly nondiscretionary and fully disclosed basis, and not as part of any discretionary investment services. Additionally, we note that clients who use UPTIQ's services will receive product-specific disclosure from the third-party financial institutions and other unaffiliated third-party intermediaries that provide services to our clients.

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

Credit Solutions

Clients retain the right to pledge assets in accounts generally, subject to any restrictions imposed by clients' custodians. While credit solution programs that we offer facilitate secured loans through third-party financial institutions, clients are free instead to work directly with institutions outside such programs. Because of the limited number of participating third-party financial institutions, clients may be limited in their ability to obtain as favorable loan terms as if the client were to work directly with other banks to negotiate loan terms or obtain other financial arrangements.

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

Cash Management Solutions

For cash management programs, certain third-party intermediaries provide administrative and settlement services to our clients. Engaging the third-party financial institutions and other intermediaries to provide cash management solutions does not alter the manner in which we treat cash for billing purposes. Clients should understand that in rare circumstances, depending on interest rates and other economic and market factors, the yields on cash management solutions could be lower than the aggregate fees and expenses charged by the third-party financial institutions, the intermediaries referenced above, and us. Consequently, in these rare circumstances, a client could experience a negative overall investment return with respect to those cash investments. Nonetheless, it might still be reasonable for a client to participate in a cash management program if the client prefers to hold cash at the third-party financial institutions rather than at other financial institutions (e.g., to take advantage of FDIC insurance). UPTIQ is available to Transform Wealth to facilitate credit and cash management solutions for our clients.

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

A. Selection of other Advisers or Managers

As discussed in the Advisory Services section of this Brochure, Transform Wealth does not directly recommend the services of third-party advisers or sub-advisers. However, Weatherstone Capital Management does provide these services which presents a conflict of interest when referring individuals to this affiliate.

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

A. Code of Ethics

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

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

Clients and prospective Clients can contact Transform Wealth to request a copy of its Code of Ethics.

ITEM 12: Brokerage Practices

A. Selecting Custodians and Broker/Dealers

Transform Wealth typically recommends the services of Charles Schwab & Co. (the "Custodian"), for its Wealth Management Clients.

Factors Transform Wealth considers in recommending Custodians or any other broker/dealer to Clients include their respective financial strength, reputation, execution, pricing, research (if any), and service. The Custodian may enable Transform Wealth to obtain many individual securities and mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Custodians may be higher or lower than those charged by other financial institutions.

Brokerage commissions and/or transaction fees charged by Custodians, or any other designated broker/dealer, are exclusive of and in addition to the Transform Wealth's Wealth Management fee.

B. Research and other Soft Dollar Benefits

Transform Wealth does not receive any research, products or services from broker/dealers or third parties, other than what is necessary for the execution of Client securities transactions. Transform Wealth does not receive any “formal soft dollar” benefits.

C. Client Referrals

Transform Wealth does not have formal referral agreements with any broker/dealer; however, it does have a referral agreement with one third party.

D. Directed Brokerage

Transform Wealth does not offer directed brokerage services.

E. Aggregation (Block) Trading

Transform Wealth allocates investment opportunities in a fair and equitable manner. Transform Wealth generally manages Client accounts with an aggregation method known as block trading. Block trading is the sale or purchase of a large number of securities in a single transaction. This is an efficient means of executing many Client transactions in the same security, generally at the same price. Block trading, also known as batch trading, is commonly used when executing equity transactions. In some instances, block trading may also be used for bond trades although due to the unique characteristics of fixed income securities, including limited inventory and inefficient markets, Transform Wealth will often manage these transactions based on individual Client directives. Transform Wealth is not obligated to batch trades although in its trading process it regularly considers opportunities to reduce commission costs to fulfill an important aspect of its best execution obligations to its Clients.

In limited instances, there may be situations where Transform Wealth executes transactions in thinly-traded securities. When this occurs, the process of selecting Clients will be done on a random basis, rather than a block trade, to avoid having small transactions across all Clients purchasing or selling the same security. Centralized Trading will complete the allocation over a period of time with the understanding that by executing transaction amounts in this manner, Clients will likely receive different prices for the same security.

If an aggregated order is not filled in its entirety, Centralized Trading will allocate trades on a rotational basis.

F. Trade Error Policy

On rare occasions, trade errors can occur. To resolve trade errors, Transform Wealth will place a correcting trade with the Client’s broker/dealer. At Schwab, Transform Wealth is responsible for any losses exceeding \$100 when it is determined it is responsible for the error. To minimize administrative costs, Schwab will absorb any losses less than \$100. When investment gains result from a trade error, the gain will be retained by the Client unless it is determined to be not permissible, or the Client elects not to accept the gain for tax purposes or other reasons. Any gains

not retained by Clients are donated by Schwab to a charity of its choice.

ITEM 13: Review of Accounts

Transform Wealth primarily manages Client accounts on a discretionary basis meaning we provide continuous and regular supervision of these accounts. Trading software is used to monitor accounts and when appropriate, and at its discretion, Transform Wealth will make portfolio changes to ensure Client assets are managed according to their agreed upon allocation models.

In limited instances, Transform Wealth will manage Client accounts on a non-discretionary basis. Transform Wealth will provide continuous and regular supervision of these accounts; however, they will first receive Client permission before effecting trades in the accounts.

Transform Wealth's investment committee meets on a periodic basis to discuss strategic and tactical decisions related to Client portfolios. The committee consists of highly experienced individuals with an understanding of global macro issues combined with significant experience evaluating equity and fixed income securities and markets.

All Wealth Management Clients are advised that it remains their responsibility to notify Transform Wealth of any changes in their investment objectives or financial situation. Clients are encouraged to review their financial planning issues, investment objectives and account performance with Transform Wealth at least on an annual basis.

Transform Wealth will provide Clients with an evaluation of Client's current financial situation and then design and implement an investment plan aimed at achieving a Client's financial objectives. Transform Wealth will conduct an initial interview and data gathering process to determine Client's individual needs, goals, time horizon and risk tolerance. Client's investments can include all manner of investment vehicles including short-term instruments, domestic or international stocks and bonds, options, mutual funds, ETFs, and/or investment vehicles such as real estate investment trusts, high dividend-paying stocks, and Master Limited Partnerships. The underlying assets of the Client's portfolio are reviewed regularly and/or based on need. Transform Wealth's recommendations can include planning for long-range goals or other segments of an investment plan that may be needed. This can include providing the Client with a current balance sheet and basic net worth, cash flow, and tax projections based on limited information provided by the Client.

Comprehensive financial planning is offered as a separate, standalone service, and provides the Client with in-depth, detailed analysis of the Client's cash flows, assets and liabilities, investments, tax circumstances, insurance needs, and estate planning considerations among other areas. This service involves identifying the Client's goals and objectives, analyzing the Client's current course of action and potential alternative future courses of action, developing financial planning recommendations, presenting those recommendations, implementing the recommendations, and monitoring the recommendations and updating the Client's progress. Comprehensive financial planning can benefit the Client by helping the Client secure their financial wellbeing and providing the Client with peace of mind.

Broker/dealers and custodians are obligated to provide Clients with transaction confirmations and statements at least quarterly. Clients are encouraged to compare these statements with any reports provided by Transform Wealth.

ITEM 14: Client Referrals and other Compensation

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

Charles Schwab & Co., Inc. provided conference sponsorship to Focus from January 1, 2023 to March 1, 2024. You can access a more recently updated list of conference sponsors on Focus' website through the following link: <https://focusfinancialpartners.com/conference-sponsors/>

Transform Wealth has arrangements in place with certain third parties, called promoters, under which such promoters refer clients to us in exchange for a percentage of the advisory fees we collect from such referred clients. Such compensation creates an incentive for the promoters to refer clients to us, which is a conflict of interest for the promoters. Rule 206(4)-1 under the Advisers Act addresses this conflict of interest by, among other things, requiring disclosure of whether the promoter is a client or a non-client and a description of the material conflicts of interest and material terms of the compensation arrangement with the promoter. Accordingly, we require promoters to disclose to referred clients, in writing: whether the promoter is a client or a non-client; that the promoter will be compensated for the referral; the material conflicts of interest arising from the relationship and/or compensation arrangement; and the material terms of the compensation arrangement, including a description of the compensation to be provided for the referral.

Transform Wealth uses the services of SmartAsset and Thumbtack to match prospective advisory clients with investment advisers in exchange for a non-success-based fee paid by Transform Wealth for engaging advisory services. As stated earlier in this Brochure, Transform Wealth is a wholly owned subsidiary of Focus LLC. Focus LLC is also one of several minority investors in SmartAsset, including one director on SmartAsset's board as well as a board observer. Transform Wealth's payment of a fee to SmartAsset benefits SmartAsset's investors, including Focus LLC, our parent company.

ITEM 15: Custody

Transform Wealth uses independent, third-party custodians not affiliated with Transform Wealth and does not take direct custody of Client funds or securities, with the exception of the SEC's safe harbor allowing it to deduct advisory fees directly from Client accounts.

Transform Wealth provides its Clients with a service called Standing Letters of Authorization (SLOA) allowing Clients to conveniently instruct their custodian to send their funds to another party. This is deemed by the SEC as custody even though Transform Wealth does not have the ability to change any routing or account number information provided by the Client to the custodian. The custodian is also responsible to review all SLOA instructions prior to initiating wire instructions. Transform Wealth takes the potential for wire fraud very seriously and has reasonable procedures and controls in place to manage this risk.

ITEM 16: Investment Discretion

As mentioned in ITEM 13 (Review of Accounts), Transform Wealth primarily manages Client investment portfolios on a discretionary basis. On a limited basis, it will offer investment management services on a non-discretionary basis. Clients may impose reasonable investment restrictions on their accounts.

In advance of providing services, all Clients must first execute an Agreement with Transform Wealth describing the obligations of both parties entering into such an agreement. Clients are also required to sign a separate agreement with their chosen custodian.

ITEM 17: Voting Client Securities

In limited instances, Transform Wealth votes proxies on behalf of its Clients. Transform Wealth has established proxy voting guidelines. Pursuant to these guidelines, Transform Wealth will generally vote in accordance with management's recommendations except in situations where Transform believes such a vote would be contrary to the best interests of its Clients. Transform Wealth maintains policies for evaluation of conflicts of interest in connection with proxy votes. Information regarding how Transform Wealth has voted proxies with respect to a Client's securities or to receive a copy of the proxy voting policies and procedures is available by written request to Transform Wealth at the contact information located on this brochure.

In instances where Transform Wealth does not accept proxy voting authority, Clients will receive proxies or other solicitations directly from their custodian and can contact the custodian with questions about any particular solicitation. Also, Transform Wealth does not participate in any class action lawsuits on behalf of its Clients.

ITEM 18: Financial Information

Transform Wealth does not require or solicit prepayment of Wealth Management fees of more than \$1,200, six months or more in advance. Transform Wealth is unaware of any financial condition that is likely to impair its ability to meet its contractual commitments to its Clients. Transform Wealth has not been the subject of a bankruptcy petition.

FACTS

WHAT DOES TRANSFORM WEALTH DO WITH YOUR PERSONAL INFORMATION?

Why?

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

What?

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

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

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

How?

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

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

Questions?

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

Who we are	
Who is providing this notice?	Transform Wealth
What we do	
How does Transform Wealth protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Transform Wealth collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> ■ Open an account or give us your income information ■ Tell us about your portfolio or deposit money ■ Enter into an investment advisory contract ■ Instruct us to send money <p>We also collect your personal information from others, such as affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ Sharing for affiliates' everyday business purposes—information about your creditworthiness ■ Affiliates from using your information to market to you ■ Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include Focus Operating, LLC.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Transform Wealth does not share with nonaffiliates so they can market to you.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ <i>Transform Wealth does not jointly market.</i>
Other important information	



Brochure Supplement

Part 2B of Form ADV

September 18, 2024

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Chief Executive Officer
Employment Dates: August 2011 to Present

Firm Name: **Northland Securities**
Job Title: VP Investment Executive
Employment Dates: January 2012 to December 31, 2014

Firm Name: **PSI**
Job Title: Director
Employment Dates: July 2008 to August 2011

Firm Name: **Claymore Securities, Inc.**
Job Title: Regional Vice President
Employment Dates: July 2005 to December 2005



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

www.AdviserInfo.sec.gov CRD # 3081407

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: President
Employment Dates: August 2011 to Present

Firm Name: **Northland Securities**
Job Title: Vice President Investment Executive
Employment Dates: January 2012 to December 2014

Firm Name: **BOSC, Incorporated**
Job Title: VP-Institutional Wealth Management
Employment Dates: March 2009 to September 2011

Firm Name: **Colorado State Bank and Trust**
Job Title: VP-Institutional Wealth Management
Employment Dates: March 2009 to September 2011

Firm Name: **Alliance Bernstein Investments**
Job Title: VP-Regional Manager
Employment Dates: July 2007 to November 2008



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Executive Vice President
& Senior Financial Advisor
Employment Dates: October 2011 to Present

Firm Name: **Carnick & Company, Inc.**
Job Title: Advisory Representative
Employment Dates: September 2002 to October 2011



Item 2: Disciplinary Information

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

Item 3: Other Business Interests

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

www.AdviserInfo.sec.gov CRD # 4611622

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Managing Director
Employment Dates: April 2019 to Present

Firm Name: **Weatherstone Capital Management**
Job Title: Portfolio Manager
Employment Dates: December 1990 to March 2019

Firm Name: **Centaurus Financial, Inc.**
Job Title: Financial Advisor
Employment Dates: November 2001 to August 2009

Firm Name: **United Pacific Securities/Sentra Securities**
Job Title: Financial Advisor
Employment Dates: July 1996 to November 2001

Firm Name: **Investment Centers of America**
Job Title: Financial Advisor
Dates: April 1992 to July 1996



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Senior Financial Advisor
Employment Dates: July 2015 to Present

Firm Name: **Valued Investment Partners, LLC**
Job Title: Co-Founder & Representative
Employment Dates: January 2006 to June 2015

Firm Name: **Campbell Financial Group**
Job Title: President
Employment Dates: January 1992 to January 2006

Firm Name: **Windsor Financial Group**
Job Title: Sr. Vice President
Employment Dates: January 1988 to December 1991



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

www.AdviserInfo.sec.gov

CRD # 1133176

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Chairman Emeritus and
Managing Director
Employment Dates: October 2011 to Present

Firm Name: **Carnick & Company, Incorporated**
Job Title: President
Employment Dates: January 1984 to October, 2011



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

www.AdviserInfo.sec.gov CRD # 702111

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Senior Financial Advisor
Employment Dates: November 2019 to Present

Firm Name: **CoBiz Wealth/BOK Financial Private Wealth, Inc.**
Job Title: SVP, Senior Portfolio Manager
Employment Dates: March 2016 to November 2019

Firm Name: **Charles Schwab**
Job Title: Portfolio Consultant
Employment Dates: January 2013 to March 2016

Firm Name: **Self Employed**
Job Title: Option Trader
Employment Dates: January 2004 to January 2013

Firm Name: **Charles Schwab**
Job Title: Portfolio Consultant
Employment Dates: February 1996 to January 2004

Firm Name: **Oppenheimer & Co. Inc**
Job Title: Dealer Services/Top Producers
Employment Dates: May 1994 to February 1996



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Director of Financial Planning
Employment Dates: October 2011 to Present

Firm Name: **Carnick & Company, Inc.**
Job Title: Advisory Representative
Employment Dates: January 2010 to October 2011

Firm Name: **Princor Financial Services, Corp.**
Job Title: Financial Advisor
Employment Dates: March 2006 to December 2009



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

www.AdviserInfo.sec.gov CRD # 5121067

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Managing Director
Employment Dates: September 2017 to Present

Firm Name: **First Houston Capital**
Job Title: President, Chief Investment Officer,
& Chief Compliance Officer
Employment Dates: June 2006 to August 2017

Firm Name: **Burnham Securities, Inc.**
Job Title: Managing Director Employment
Employment Dates: April 1999 to June 2006

Firm Name: **Oppenheimer & Company**
Job Title: Managing Director Employment
Employment Dates: January 1991 to April 1999



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

Amy M. Zamikovsky, CFP®, CPWA® was born in 1978. She holds a Bachelor of Science from Southeastern Louisiana University, and a Doctor of Law (J.D.) from the University of Houston. Amy's business experience is as follows:

Firm Name: **Transform Wealth, LLC**
Job Title: Senior Financial Advisor
Employment Dates: March 2024 to Present

Firm Name: **Zamikovsky Law, PLLC**
Job Title: Attorney and Counselor at Law
Employment Dates: November 2021 to March 2024

Firm Name: **Merrill Lynch**
Job Title: Financial Advisor
Employment Dates: October 2017 to November 2021

Firm Name: **Oak Harvest Financial Group**
Job Title: Financial Planner
Employment Dates: February 2022 to September 2022

Firm Name: **Woodson Wealth Management**
Job Title: Wealth Manager
Employment Dates: February 2023 to March 2024

Firm Name: **The Law Office of Amy M. Glasscock, PLLC**
Job Title: Attorney at Law
Employment Dates: May 2015 to October 2017



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

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

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



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

John H. Hancock was born in 1960. He holds a B.S. in Psychology from the University of Central Missouri and a B.S. in Business from the University of Missouri. John also has a M.S. in Personal Financial Planning and he holds the CFP® designation. John's business experience is as follows:

Firm Name: **Transform Wealth, LLC**
Job Title: Managing Director
Employment Dates: October 2022 to Present

Firm Name: **Strategic Capital Advisers, Inc**
Job Title: President & Chief Compliance Officer
Employment Dates: February 2000 to September 2022



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

As a result of Transform Wealth's acquisition of Strategic Capital Advisers Inc, John receives earn out compensation from our parent company, Focus Financial Partners, LLC, based on Strategic Capital Adviser's revenues for a specified period of time.

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

Jonathan D. Ahalt was born in 1964. He holds a B.A. in Political Science from Miami University and a M.S. in Finance from the University of Denver. Jonathan's business experience is as follows:

Firm Name: **Transform Wealth, LLC**
Job Title: Managing Director
Employment Dates: October 2022 to Present

Firm Name: **Strategic Capital Advisers, Inc** Senior
Job Title: Financial Advisor and Secretary
Employment Dates: April 2000 to September 2022



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

As a result of Transform Wealth's acquisition of Strategic Capital Advisers Inc, Jonathan receives earn out compensation from our parent company, Focus Financial Partners, LLC, based on Strategic Capital Adviser's revenues for a specified period of time.

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Senior Financial Advisor
Employment Dates: November 2019 to Present

Firm Name: **BOK Financial Private Wealth, Inc.**
Job Title: SVP, Senior Wealth Advisor
Employment Dates: July 2019 to November 2019

Firm Name: **CoBiz Wealth**
Job Title: SVP, Senior Portfolio Manager
Employment Dates: July 2011 to June 2019

Firm Name: **Colorado Business Bank**
Job Title: SVP, Sr. Trust Portfolio Manager
Employment Dates: January 2007 to June 2011

Firm Name: **ANB Bank**
Job Title: SVP, Trust Investments
Employment Dates: March 1998 to January 2007



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

Thomas J. Maxfield was born in 1975. He holds a Bachelor of Arts from Northwestern University, a Juris Doctorate from the University of Denver College of Law and a Master of Business Administration from the University of Colorado. Thomas's business experience is as follows:

Firm Name: **Transform Wealth, LLC**
Job Title: Senior Financial Advisor
Employment Dates: November 2023 to Present

Firm Name: **Northern Trust Wealth Management** Job
Title: Wealth Strategist
Employment Dates: November 2017 to October 2023

Firm Name: **TMG, LLC**
Job Title: Managing Partner
Employment Dates: January 2015 to November 2018

Firm Name: **Fortis Private Bank**
Job Title: Senior Vice President
Employment Dates: June 2012 to May 2016



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

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

Firm Name: **Transform Wealth, LLC**
Job Title: Financial Advisor
Employment Dates: July 2015 to Present

Firm Name: **Valued Investment Partners, LLC**
Job Title: Client Services Manager
Employment Dates: January 2008 to June 2015

Firm Name: **Cherry Hills Investment Advisors**
Job Title: Associate
Employment Dates: January 2007 to December 2007



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

www.AdviserInfo.sec.gov

CRD # 6192684

Item 1: Educational Background and Business Experience

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

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

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



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

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

Item 1: Educational Background and Business Experience

Phillip E. Woodford was born in 1974. He holds a B.S. in Economics from the University of Tennessee. Phillip's business experience is as follows:

Firm Name: **Transform Wealth, LLC**
Job Title: Senior Client Service Representative
Employment Dates: October 2022 to Present

Firm Name: **Strategic Capital Advisers, Inc**
Job Title: Operations Manager
Employment Dates: September 2009 to September 2022



Item 2: Disciplinary Information

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

Item 3: Other Business Activities

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

Item 4: Additional Compensation

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

Item 5: Supervision

Phillip is directly supervised by Luis Perez, Director of Operations of the Firm. He may be reached at (720) 509-3559. This Brochure Supplement provides information about Phillip that supplements the Transform Wealth, LLC Brochure. You should have received a copy of that Brochure. Please contact Transform Wealth, LLC if you did not receive the Firm's Brochure or if you have any questions about the contents of this supplement. Additional information about Phillip Woodford is available on the SEC's website at:

Professional Designation Disclosures

CFA – Chartered Financial Analyst

Issued by: CFA Institute

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

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

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

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

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

CAIA – CHARTERED ALTERNATIVE INVESTMENT ANALYST

Issued by: CAIA Association

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

- 1 year of professional experience
- 2 professional references

Educational Requirements: N/A

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

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

Continuing Education Requirements: N/A

CFP® - CERTIFIED FINANCIAL PLANNER™

Issued by: Certified Financial Planner Board of Standards, Inc.

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

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

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

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

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

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

Continuing Education Requirements: 30 hours every 2 years.

CIMA® - Certified Investment Management Analyst®

Issued by: Investments & Wealth Institute

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

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

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

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

CPWA® -Certified Private Wealth Advisor®

Issued by: Investments & Wealth Institute

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

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

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

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

CPA – Certified Public Account

Issued by: AICPA

Prerequisites/Experience Required:

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

Examination Type: Certified Public Account (CPA) Examination

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

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

PFS - Personal Financial Specialist

Issued by: Investments & Wealth Institute

Prerequisites/Experience Required:

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

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

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

Examination Type: CPA/PFS Certification Examination

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

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

CRPC – Chartered Retirement Planning Counselor®

Issued by: College for Financial Planning

Prerequisites/Experience Required: N/A

Examination Type: CRPC Certification Examination

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

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