WEALTHEQ

PRIVATE WEALTH MANAGEMENT

FORM ADV PART 2A BROCHURE

August 15, 2026

WealthEQ LLC

CRD# 324498

1804 Alpine Dr.

Erie, CO 80516

P: (720) 636-1998

W: www.wealth-eq.com

This brochure provides information about the qualifications and business practices of WealthEQ LLC ("WealthEQ" or "we"). If you have any questions about this brochure, please contact us at (720) 636-1998 or mike@wealth-eq.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

WealthEQ is registered as an investment adviser with the State of Colorado. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about WealthEQ is also available on the SEC's website at www.adviserinfo.sec.gov.

2)MATERIAL CHANGES

WealthEQ has made the following material changes to this

Brochure since the last update dated August 15, 2026:

- Item 4: Increased discretionary AUM
- Item 4, 5, 7: Increased OCIO minimum relationship to $25 million
- Item 5: Removed annual inflation adjustment from captive fees
- Item 5: Explanation of when fees can be recalculated

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4) ADVISORY BUSINESS

WealthEQ is a single member LLC started in 2022 by Michael Corbett who is the founder and chief compliance officer. Prior to founding WealthEQ, Mike served as a wealth advisor for a multi-family office and investment consultant for an independent registered investment advisor, working with high-net-worth, ultra-high net-worth, family office, and captive insurance clients. He is a CFA, CFP®, and CTFA.

WealthEQ provides wealth management and investment advisory services to high-net-worth individuals, families, family offices, and captive insurance companies. We offer three separate service offerings and fee structures to provide solutions that are more tailored to the specific situation and needs of our clients. The three service offerings are: 1) Personal Chief Financial Officer (CFO); 2) Outsourced Chief Investment Officer (OCIO); and 3) Captive Investment Management.

The following is a breakdown of the three services.

Personal Chief Financial Officer (CFO)

WealthEQ designs, builds, and implements tax efficient wealth structures, plans, and portfolios to provide the necessary capital to meet goals and objectives. We require discretionary investment management for this service.

Client Situation and Needs: High Net-Worth individuals or families with assets greater than $1 million that want integrated wealth planning and investment management.

- Integrated Wealth Planning
    - Development of goals and objectives; goals based and cash flow planning; total income modeling; retirement, lifestyle, estate, tax, and insurance planning; social security optimization; stress testing and scenario analysis.
- Tax Planning
    - Prior year tax summary, current year tax projections, tax preparation letters.
- Personal Financial Statements
    - Holistic balance sheet, income statement, statement of net worth.
- Detailed Portfolio Analysis
    - Complete analysis of risk, return, diversification, fees, and taxes.
- Goals Based Investing
    - Bucket approach to portfolio construction; tracking of progress toward goal.
- Tax and Fee Efficient Investing
    - Develop portfolios with the primary goal of clients keeping more of their money after taxes and fees.
- Model and Custom Portfolios
    - Numerous models that incorporate different investment strategies, styles, and allocations. Custom portfolios that are designed to reduce tax transition costs, meet certain goals, and/or

match specific liabilities.

- Private Market Access
  - Options to invest in private equity and debt, venture capital, real estate, and other private investment vehicles. These investments are limited to accredited investors.
- Real Time Reporting
  - Client portal with access to portfolios values that update in real time.
- Integrated Technology Platform
  - Electronic integration of financial planning and investments to provide a more complete picture of a client's financial situation and progress.
- Investment Management
  - Our model portfolio options include several passive, active, tax managed, and style-based solutions. Our custom portfolios consider existing security holdings to develop a portfolio that targets a specific allocation based on the client's goals and objectives. Every investment recommendation considers taxes and fees. We will educate our clients on the pros and cons of each recommendation. Our investment recommendations may consist of public equities, fixed income, private equity, venture capital, real estate, and other public and private securities. The investment vehicles may include individual securities, mutual funds, exchange-traded funds, separately managed accounts, and private investment structures. We utilize private investment vehicles to give our clients exposure to specialized strategies within their portfolio.
  - We take a goals-based approach to investing, but also offer liability driven solutions. Once goals and objectives are identified, we begin the portfolio selection process where the client and WealthEQ will determine whether a model or custom portfolio is best suited to meet each of the specific goals. We believe that many clients will come into the relationship with certain investing biases, so we offer clients portfolio options that span numerous investment styles and strategies. The portfolio selection process involves educating the client on the pros and cons of each style approach and strategy. The client then makes the decision on the specific portfolio that is best suited for their situation.
  - Upon completion of the portfolio selection process, we create a customized IPS based on the client's investment preferences and objectives, behavioral biases, spending needs, risk ability and willingness, and time horizon. The IPS sets investment parameters that guide us when we make decisions about each client's portfolio. The client determines the level of discretion they grant us over specific accounts which is captured and memorialized in the IPS. The client and WealthEQ will select asset classes and determine the correct allocations within those classes. The process of determining a suitable allocation will involve an analysis of both the client's ability and willingness to take risk. The ability is objective, while willingness is subjective.
  - Once we establish account parameters, we will have the authority to direct the investment of account assets (including rebalancing and tax loss harvesting) and to manage the client's account(s)

within the agreed-upon investment parameters, and to determine pricing and timing of transactions, without the prior approval of the client. However, changes in asset classes, allocations within asset classes, and any other investment guidelines and limitations will be made only with the client's prior approval.

- The client is not permitted to place reasonable restrictions on investments (i.e., ESG) due to the nature of the securities that WealthEQ invests in.

WealthEQ does not offer tax or legal advice. We will, at a client's direction and approval, work with the client's existing tax or legal professionals to assist in those services. We may refer professionals; however, there is no compensation to WealthEQ for these referrals, and clients always have the right to decide whether to use the referred services.

Outsourced Chief Investment Officer (OCIO)

WealthEQ provides non-discretionary investment advisory and/or discretionary investment management services. We develop and manage custom portfolio solutions and/or work with your existing asset managers and advisors to enhance portfolio outcomes after taxes and fees.

Client Situation and Needs: Ultra-high-net-worth individuals or families with assets typically greater than $25 million who want fiduciary oversight and guidance regarding existing manager relationships and/or portfolio management and investment advisory.

- Holistic View of Wealth
  - Investment reporting at the account, manager, and household level.
- Personal Financial Statements
  - Holistic balance sheet, income statement, statement of net worth.
- Comprehensive Relationship and Portfolio Analysis
  - Complete analysis of risk, return, diversification, fees, and taxes for each of the wealth managers currently employed by the client.
- Model and Custom Portfolios
  - Numerous models that incorporate different investment strategies, styles, and allocations. Custom portfolios are designed to reduce tax transition costs, meet certain goals, and/or match specific liabilities.
- Tax and Fee Efficient Investing
  - Develop portfolios with the primary goal of clients keeping more of their money after taxes and fees.
- Family Office Reporting and Analytics
  - Detailed reporting on every asset the client owns.
- Private Market Access
  - Options to invest in private equity and debt, venture capital, real estate, and other private investment vehicles. These investments are limited to accredited investors.
- Real Time Reporting
  - Client portal with access to portfolios data that updates in real time.

- Digital Document Vault
    - Secure document storage.
- Investment Advisory
    - Our investment advisory "advice only" is designed for clients that do not want or need WealthEQ to have discretion over some or all of their investment accounts. An investment advisory relationship is assumed to be non-discretionary. This means that WealthEQ will not be directing or executing trades, rebalancing, or tax loss harvesting in client accounts, but will provide instructions to brokers or managers upon the client's request. The client will provide WealthEQ with limited power of attorney to direct managers to make changes to the portfolio(s) that the client and advisor agree is in the best interest of the client.
    - The specific advisory services include portfolio selection and design, asset allocation development and/or enhancement, asset location optimization, manager and product due diligence, monte carlo, stress testing and scenario analysis, and assistance with identifying and sourcing private investment opportunities in pooled investment vehicles such as limited partnerships and limited liability companies, special purpose vehicles, or direct investments in businesses or real estate.
- Investment Management
    - Our model portfolio options include several passive, active, tax managed, and style-based solutions. Our custom portfolios consider existing security holdings to develop a portfolio that targets a specific allocation based on the client's goals and objectives. Every investment recommendation considers taxes and fees. We will educate our clients on the pros and cons of each recommendation. Our investment recommendations may consist of public equities, fixed income, private equity, venture capital, real estate, and other public and private securities. The investment vehicles may include individual securities, mutual funds, exchange-traded funds, separately managed accounts, and private investment structures. We utilize private investment vehicles to give our clients exposure to specialized strategies within their portfolio.
    - We primarily take a goals-based approach to investing, but also offer liability driven solutions. Once goals and objectives are identified, we begin the portfolio selection process where the client and WealthEQ will determine whether a model or custom portfolio is best suited to meet each of the specific goals. We believe that many clients will come into the relationship with certain investing biases, so we offer clients portfolio options that span numerous investment styles and strategies. The portfolio selection process involves educating the client on the pros and cons of each style approach and strategy. The client then makes the decision on the specific portfolio that is best suited for their situation.
    - Upon completion of the portfolio selection process, we create a customized IPS based on the client's investment preferences and objectives, behavioral biases, spending needs, risk ability and willingness, and time horizon. The IPS sets investment parameters that guide us when we make decisions about each

client's portfolio. The client determines the level of discretion they grant us over specific accounts which is captured and

memorialized in the IPS. The client and WealthEQ will select asset classes and determine the correct allocations within those classes. The process of determining a suitable allocation will involve an analysis of both the client's ability and willingness to take risk. The ability is objective, while willingness is subjective.

- Once we establish account parameters, we will have the authority to direct the investment of account assets (including rebalancing and tax loss harvesting) and to manage the client's account(s) within the agreed-upon investment parameters, and to determine pricing and timing of transactions, without the prior approval of the client. However, changes in asset classes, allocations within asset classes, and any other investment guidelines and limitations will be made only with the client's prior approval.
- The client is not permitted to place reasonable restrictions on investments (i.e., ESG) due to the nature of the securities that WealthEQ invests in.

WealthEQ does not offer tax or legal advice. We will, at a client's direction and approval, work with the client's existing tax or legal professionals to assist in those services. We may refer professionals; however, there is no compensation to WealthEQ for these referrals, and clients always have the right to decide whether to use the referred services.

Captive Investment Management

WealthEQ provides discretionary investment management services to captive insurance companies.

Client Situation and Needs: captive insurance company with an investment portfolio greater than $1 million in need of investment management services.

- Custom Portfolios
  - Custom portfolios that are designed to meet the unique liabilities of the captive while adhering to investment policy mandates.
- Tax and Fee Efficient Investing
  - Develop portfolios that are designed to enhance returns after fees and taxes.
- Real Time Reporting
  - Client portal with access to portfolio data that updates in real time.
- Digital Document Vault
  - Secure document storage.
- Collaboration with captive administrators/advisors
  - We work with your existing captive services providers to

ensure there is available liquidity to meet future and current liabilities and ensure investments are compliant with industry approved investment policies.

- Investment Management
    - We take a liability driven approach to captive portfolios. Captives have different liabilities that require a structure that is consistent with the way portfolios are managed within the insurance industry.

      Our portfolio construction process considers existing security holdings (if applicable) to develop a portfolio that more closely matches investment assets with the insurance risks of the business. Every investment recommendation considers taxes and fees. Our investment recommendations may consist of public equities, fixed income, liquid private investment vehicles (i.e. evergreen structures), real estate, and other public and private securities. The investment vehicles may include individual securities, mutual funds, exchange-traded funds, separately managed accounts, and private investment structures. We utilize private investment vehicles to give our clients exposure to specialized strategies within their portfolio.

    - Upon completion of the portfolio selection process, we will develop an Investment Policy Statement (IPS) that is consistent with industry standards for captive insurance companies. The IPS sets investment parameters that guide us when we make decisions about each client's portfolio. The client determines the level of discretion they grant us over specific accounts which is captured and memorialized in the IPS. The client and WealthEQ will select asset classes and determine the correct allocations within those classes.
    - Once we establish account parameters, we will have the authority to direct the investment of account assets (including rebalancing and tax loss harvesting) and to manage the client's account(s) within the agreed-upon investment parameters, and to determine pricing and timing of transactions, without the prior approval of the client. However, changes in asset classes, allocations within asset classes, and any other investment guidelines and limitations will be made only with the client's prior approval.
    - The client is not permitted to place reasonable restrictions on investments (i.e., ESG) due to the nature of the securities that WealthEQ invests.

WealthEQ does not offer tax or legal advice. We will, at a client's direction and approval, work with the client's existing tax or legal professionals to assist in those services. We may refer professionals; however, there is no compensation to WealthEQ for these referrals, and clients always have the right to decide whether to use the referred services.

As of August 15, 2026 WealthEQ managed $32million in client assets on a discretionary basis and $0 million on a non-discretionary basis.

5)FEES AND COMPENSATION

As described in the Advisory Business section above, we offer Personal Chief Financial Officer, Outsourced Chief Investment Officer (OCIO), and Captive Investment Management. There are no additional services provided by WealthEQ. We do not participate in wrap fee programs or engage in referral fees or soft dollar arrangements. Our only form of compensation is from the fees that clients pay us.

We have three separate fee schedules for each of the services we offer. For all services, we charge clients a fixed fee that is calculated by multiplying the applicable fee percentage by the value of the assets that WealthEQ manages or advises on at the inception of the relationship. The applicable percentage is determined by asset-based breakpoints and is lower at higher breakpoints. That single percentage is applied to the entire fee base rather than to incremental portions of it. Once established, the fixed fee does not increase or decrease because of investment gains or losses in the portfolio. It is recalculated only when the assets we manage or advise on change materially for reasons other than investment performance, as described under "Note on fee adjustments" below. For Personal Chief Financial Officer and OCIO, the fixed fee adjusts with inflation after the periods described below. Captive Investment Management fees do not adjust with inflation.

- For Personal Chief Financial Officer, we charge a fixed fee and incorporate discounts that have the potential of reducing the fee amount over time. We believe that incentives drive behavior, so these discounts are designed to encourage clients to take advantage of the benefits of planning and reinforce disciplined investing. The discount opportunities begin in year one of the relationship and end in year five, at which point the fee starts being adjusted with inflation.
  - For example, a client that invests $1 million with WealthEQ would be charged $8000 in year 1 (.0080 * $1 million). This fee would not adjust in year 2 or subsequent years from investment growth resulting from income or appreciation in the portfolio. If the client completes a wealth plan within the first five years, the client receives a .10% discount (reduction of .0010*$1 million) on their fee starting in January of the following year. Additionally, if the client stays invested in the markets (i.e., doesn't move to cash during a correction or other market event) for 5 years, the client will receive an additional discount of .20% (reduction of .0020*$1 million). Should the client take advantage of both discount opportunities, the client's fee would be reduced to $5000 at the beginning of year 6. The fee adjusts for inflation starting at the beginning of year 6.
  - There is no additional cost/fee for completing a wealth plan or receiving other services.
- For OCIO, we charge a fixed fee that steps down (is reduced each year)

over three years. The purpose of the step down is to compensate WealthEQ for the greater amount of work and cost in the early years of the relationship. The fixed fee adjusts with inflation at the end of year three.

- For Captive Investment Management, we charge a fixed fee determined by asset-based breakpoints applied to the starting portfolio value. The applicable fee percentage is set at the inception of the relationship and does not change. The fee is recalculated for premium additions to the portfolio but not for investment return growth, and it does not adjust with inflation. Premium additions increase the fee in dollar terms over time, which is why no separate inflation adjustment is applied.

WealthEQ reserves the right to customize the fee upon client request or to better suit the client's situation. The fee will remain fixed but may not adhere to the break points and/or incentive structure set forth in the schedules above.

WealthEQ provides portfolio analysis and some financial planning services free of charge to prospective clients. However, if a prospective client requests extensive planning and/or has a very complex situation that requires significant time and resources, WealthEQ may request a one-time fee agreed upon in advance.

The client should be aware that investment products such as Exchange Traded Funds and Private Investment Vehicles charge additional fees for management and administration. These fees will be disclosed to the client. Additionally, the client may incur costs from their custodian. WealthEQ makes every effort to provide a total fee breakdown so the client is aware of any additional fees that may impact their portfolio's performance. We say "every effort" because there may be implicit or explicit costs that are not fully disclosed or easily discernible by the custodian(s) or specific managers. Part of the reason that WealthEQ offers clients different portfolio strategies is because certain strategies (generally speaking) charge higher fees than others. We realize that each client has a different level of fee sensitivity, so we provide options and educate our clients on the pros and cons of each option. We seek to provide our clients with the greatest degree of cost transparency.

<u>Note on fee base used for fee calculations</u>: For cash or investments that the client has transferred to WealthEQ for management or advisement, the dollar fee is calculated by taking the fee rate and multiplying it by the fee base. The fee can be based on just assets under management (discretionary assets), assets under advisement (non-discretionary assets), or a combination of the two. The fee base value is calculated by summing the market value of the investments at the time they are transferred to WealthEQ for management (completion of transfer to managed account) or advisement (link established to external investment account).

Note on fee adjustments: The fixed fee is calculated on the fee base established at the inception of the relationship. It does not increase or decrease as a result of investment gains or losses in the portfolio. The fee base is recalculated, however, when the assets WealthEQ manages or advises on change materially for reasons other than investment performance.

A material change means additions to, or permanent withdrawals from, the fee base that in the aggregate over any rolling twelve-month period exceed 10% of the then-current fee base. Contributions and withdrawals below that threshold — including periodic savings, dollar-cost averaging, and routine distributions — do not trigger a recalculation. Changes that typically do meet the threshold include the transfer of a portfolio previously held with another manager, proceeds from the sale of a business or real property, an inheritance or other windfall, and the addition of accounts not previously under our management or advisement. This applies whether or not the assets were disclosed to us before the relationship began.

When the threshold is met, the fee base is reset to the market value of the assets we manage or advise on at that time, and the applicable fee percentage is re-determined using the breakpoints in the schedules above. Any reductions the client has already earned are then subtracted from that re-determined percentage. Earned reductions are never forfeited and their measurement periods do not restart. The revised fee takes effect at the beginning of the next billing period. Because a single percentage applies to the entire fee base, and because the schedules are lower at higher breakpoints, a large addition is charged at a lower percentage than if the added assets were billed at the client's original rate.

Example of a recalculation: A Personal Chief Financial Officer client begins the relationship with $1,000,000. The applicable breakpoint percentage is 0.80%, so the annual fee is $8,000. The client completes a wealth plan, reducing the percentage by 0.10%, and stays invested in the plan for five years, reducing it by a further 0.20%. At the beginning of year six the percentage is 0.50% and the annual fee is $5,000. In year six the client transfers in an additional $10,000,000. Because that addition exceeds 10% of the then-current fee base, the fee base is recalculated to $11,000,000. A fee base of $11,000,000 falls within the "greater than $10 Million but less than or equal to $20 Million" breakpoint, so the re-determined percentage is 0.70%. The client's two earned reductions, totaling 0.30%, are subtracted from that percentage. The resulting fee percentage is 0.40% and the annual fee is $44,000.

A recalculation does not restart the relationship for purposes of the wealth plan reduction, the tenure reduction, or the inflation adjustment. Those continue to run from the original inception date. For captive clients, the fee base is also recalculated for premium additions as described in the captive fee schedule above.

WealthEQ
Personal Chief Financial Officer – Annual Fixed Fee Schedule

Asset Based Breakpoints	Fee Percentage of Starting Value
Less than or equal to $5 Million	0.80%
Greater than $5 Million but less than or equal to $10 Million	0.75%
Greater than $10 Million but less than or equal to $20 Million	0.70%
Greater than $20 Million	Custom

Note: Minimum starting annual fee is $8,000. The fee adjusts for inflation after year 5.

Having a plan and staying invested are critical toward meeting long term goals.

The fee is reduced for the following:

1. Complete a wealth plan within the first 5 years (Reduction of 0.10% (one time))
2. Stick to the investment plan for 5 years (Reduction of 0.20% (one time))

The fee will be calculated by multiplying the above percentage by the value of the account at the inception of the relationship. The applicable percentage is determined by the breakpoint into which the starting value falls and is applied to the entire account, not to incremental portions of it. The client has the option to be billed monthly (1/12th of fee amount) or quarterly (1/4th of fee amount) at the end of each period.

WealthEQ
Outsourced Chief Investment Officer (OCIO) – Annual Fixed Fee Schedule

Asset Based Breakpoints	Year 1	Year 2	Year 3
Less than or equal to $50 Million	0.500%	0.450%	0.400%
Greater than $50 Million but less than or equal to $75 Million	0.400%	0.350%	0.300%
Greater than $75 Million but less than or equal to $150 Million	0.300%	0.250%	0.200%
Greater than $150 Million but less than or equal to $500 Million	0.250%	0.200%	0.175%
Greater than $500 Million but less than or equal to $1 Billion	0.200%	0.175%	0.150%
Greater than $1 Billion	Custom	Custom	Custom

Note: Minimum annual starting fee is $125,000. The fee adjusts for inflation after year 3.

The fee will be calculated by multiplying the above percentages in years 1, 2, & 3 by the value of the account at the inception of the relationship. The applicable percentage is determined by the breakpoint into which the starting value falls and is applied to the entire account, not to incremental portions of it. The client has the option to be billed monthly (1/12th of fee amount) or quarterly (1/4th of fee amount) at the end of each period.

WealthEQ
Captive Investment Management – Annual Fixed Fee Schedule

Asset Based Breakpoints	Fee Percentage of Starting Value
Less than or equal to $5 Million	0.70%
Greater than $5 Million but less than or equal to $10 Million	0.55%
Greater than $10 Million but less than or equal to $20 Million	0.40%
Greater than $20 Million	Custom

Note: Minimum starting annual fee is $7,000. Captive fees do not adjust with inflation.

The fee will be calculated initially by multiplying the above percentage by the value of the account at the inception of the relationship. The applicable fee percentage is set at the inception of the relationship and does not change. The fee amount does not adjust with investment returns but does adjust with premium additions.

For example, the 0.40% fee on a $15 million portfolio with 10% annual growth ($1.5 million) and a $1 million premium increase will be recalculated based on the original $15 million and $1 million premium addition. Therefore, the new fee will be 0.40% x $16 million in year 2. Fees that increase with investment growth incentivize risk taking behavior and increase the fee drag on the portfolio, which is why we don't include investment returns in our fee calculations.

The client has the option to be billed monthly (1/12th of fee amount) or quarterly (1/4th of fee amount) at the end of each period.

Billing

We compute client fees based on the beginning value (assets identified at the beginning of the relationship) of either assets under management or assets under advisement using the fee schedules set forth above for each calendar month or quarter (client chooses frequency) and invoice such fees in arrears. The fees are directly deducted from investment accounts or through a third party that deducts fees directly; WealthEQ does not have access to bank account information. See item 15 for more details.

Either WealthEQ or a client may terminate the client agreement at any time. In the event of termination, WealthEQ will be entitled to receive its earned and unpaid advisory fee for the portion of the month or quarter, whether fees are paid monthly or quarterly, elapsed prior to termination. The client has 5 days after signing the client agreement to terminate the relationship without fear of penalty.

6) PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

WealthEQ does not receive performance-based fees from clients.

WealthEQ may invest clients in manager funds that charge performance-based fees in lieu of or in addition to asset-based fees. Performance-based fee arrangements are typical amongst alternative investment managers (i.e., private equity, venture capital, hedge funds, etc.). WealthEQ does not share in any performance-based fees with any of the managers that are recommended to clients. WealthEQ will fully disclose to clients the specifics of the performance-based fees charged by each manager and/or any specific investments recommended by WealthEQ.

7) TYPES OF CLIENTS

As described above, WealthEQ provides wealth management and advisory services to high net-worth individuals, families, family offices, and captive insurance companies.

- For Personal Chief Financial Officer (CFO), we feel that high-net-worth individuals or families with at least $1 million in investable assets that want integrated wealth planning and investment management are best suited for this service.
- For Outsourced Chief Investment Officer (OCIO), we feel that ultra-high net-worth individuals or families with investable assets typically greater than$25million who want investment management and/or fiduciary oversight and guidance of existing investment portfolios being managed but external wealth managers and advisors are best suited for this service.
- For Captive Investment Management, we feel that captive insurance companies with at least $1 million in investable assets are best suited for this service.

8) METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OFLOSS

Both fundamental and behavioral principles make up the foundation of our approach to wealth management. The below business, planning, and investing principles guide our decisions and actions.

Business Principles

- Lean organizations can be more innovative
- Wealth management is a team sport
- Technology is transformative
- A good process should yield good results

- Fees are only an issue in the absence of value

Planning Principles

- The right goals start with 'Why'
- Plans rarely go as planned
- Hope is not a course of action
- Perfection is the enemy of good enough
- Sometimes the simplest solution is the most effective

Investment Principles

- Temperament is more important than intellect
- Mathematically elegant doesn't necessarily mean optimal
- Time in the markets beats timing the markets
- Forecasting is inherently inaccurate
- Fees and taxes matter a lot

Philosophy and Approach

We believe that effective wealth management requires the proper balance of strategic thinking, statistical reasoning, behavioral psychology, and process automation.

We incorporate behavioral finance, automation, and artificial intelligence to enhance the client experience and reinforce disciplined investing. We leverage technology for greater insights, enhanced planning capabilities, and real time analysis and reporting.

Our investment approach is research based, simple, and considers fundamental and behavioral factors. We do not incorporate technical factors or engage in market timing behavior. We take a goals-based or liability driven approach to portfolio construction and seek to systematize and automate client plans and investments to the greatest degree possible with current technology. We do not try to predict economic and market outcomes; we are evidence based and expect markets to revert to the mean over the long term. We back test model portfolios to understand how the portfolios have performed over different time horizons and in different market environments. We have developed capital market expectations to provide clients with forward-looking expected returns in addition to the historical returns provided from portfolio back testing. We encourage clients to buy and hold investments and incorporate annual and tolerance band rebalancing.

We believe that people have the greatest impact on the client's experience.

We do our best to integrate outside advisors to develop a core advisor team that has the necessary expertise to develop better solutions for our clients.

We are laser focused on delivering value. Several studies have shown that best practices such as behavioral coaching, cost effective investing, tax management, and utilizing a total wealth framework add significant value. We incorporate all the above best practices into our approach.

Process

We have adapted the military decision-making process that our founder learned during his 10 years in the Navy SEAL teams. This approach treats the client as the ultimate decision maker; it's WealthEQ's job to educate, advise, and execute for the client.

We make every attempt to make the processes associated with onboarding, implementation, and client service as efficiently as possible. Below is an example of the onboarding process for our Personal Chief Financial Officer service:

1. Gather & Organize
   - We go over process and expectations. We gather and organize financial documentation. Document upload is handled through secure online systems to avoid inefficient email exchange and potential security risks associated with email systems.
2. Analyze & Design
   - Review documentation, identify goals & objectives, formulate balance sheet and net worth statement, conduct behavioral assessment, and portfolio analysis.
3. Evaluate & Approve
   - Identify portfolio structure, strategy, and asset allocation. Review wealth strategy and plans. Develop and present course of action to the client for approval.
4. Automate & Digitize
   - Automate contributions, loss harvesting, rebalancing, and trading. Ensure all documentation, plans, and investments are accessible by the client for review at any time.
5. Monitor & Serve
   - Review plans & strategies, track goals, and monitor portfolio performance. Provide continuing education and be a proactive advisor to the client.

Risks

We look at risk from both a planning and investment perspective. For clients that choose our Personal CFO service, we incorporate both planning and investment risk metrics. For clients that choose OCIO or Captive Investment Management, we only incorporate investment risk metrics.

We define planning risk as the probability of not meeting your goals and objectives. We evaluate planning risk on a per goal basis and calculate goal probabilities and then aggregate those probabilities. A big part of why we incorporate behavioral finance is because we believe one of the biggest risks is not sticking to your plan. We help mitigate behavioral risk factors through assessments, education, engaging outside expertise, automation, providing alternatives, building optionality and room for error, and aligning discounts. We believe that when it comes to planning, progress toward goal is the proper performance metric.

We don't believe there is a standard definition of investment risk. The proper risk metric depends on situational and behavioral factors. The situational factors are primarily used to assess a client's ability to take risk while behavioral factors are used to assess their willingness to take risk. The situational factors include available assets, liquidity needs, and time horizon. The behavioral factors that influence a client's willingness to take risk include goal importance, behavioral biases, and the client's perception of risk.

We believe that clients' generally think of investment risk in one of three ways: risk of loss/default, market/fluctuation risk (volatility), and downside risk. The specific metric(s) used for a client depends on the client's situation and

behavioral factors described above. It's important to point out that there are other risk metrics that we look at to evaluate investment opportunities to include the following:

- Liquidity risk: Risk that a security cannot be traded quickly enough at a certain time to provide the cash needed to meet a specific obligation.
- Geographic risk: Economic, political, environmental, or other localized risks that affect markets in certain countries or regions.
- Behavioral risk: Behaviors that lead investors to make poor decisions involving money or investing.
- Interest rate risk: A decline in prices from rising interest rates.
- Inflation risk: The erosion of purchasing power or decline in prices of certain investments from an increase in inflation.
- Concentration risk: A significant loss in value in a specific security such that recovery is unlikely.
- Valuation risk: Risk that a specific security is highly overvalued.
- Illiquidity risk: Risk of not being able to sell an investment. For example, private investment vehicles have redemption periods,

restrictions on withdrawals, and often have lock up periods.

- Risk Necessity: The amount of risk needed to achieve a specific goal.
- Risk Capacity: The ability to assume investment risk relative to their financial resources.
- Risk Willingness: The client's willingness to assume investment risk.

While we strive to reduce risk and maximize returns for clients, we cannot guarantee that this will occur. Investing involves a risk of loss that clients should be prepared to bear, including the loss of original principal. Clients should never presume that future performance of any specific investment or investment strategy will be profitable. There is no guarantee a portfolio will meet a target return or an investment objective.

Investment Risks by Security Type

All investments involve risk, including the potential loss of principal. No investment strategy or security can guarantee a profit or protect against loss in all market conditions. The following is a summary of material risks associated with the types of securities and investment vehicles we may recommend or manage.

- Exchange-Traded Funds (ETFs)
  - ETFs are subject to market risk, meaning their value may fluctuate based on changes in market conditions, economic factors, or issuer-specific events. ETFs also involve tracking risk, as they may not perfectly replicate the performance of the underlying index. Some ETFs may use leverage or derivatives, which can magnify gains and losses. In addition, ETFs may trade at prices above or below their net asset value (NAV).
- Mutual Funds
  - Mutual funds are subject to market risk, manager risk, and investment strategy risk depending on the fund's objectives. Actively managed funds may underperform their benchmarks due to management decisions. Mutual funds may also involve liquidity risk, interest rate risk, credit risk, or sector concentration risk, depending on the underlying holdings.
- Closed-End Funds (CEFs)
  - Closed-end funds carry many of the same risks as mutual funds and ETFs but also involve additional risks, including premium/discount risk, as CEFs often trade at prices significantly above or below NAV. Many closed-end funds use leverage, which can increase volatility and amplify losses. Liquidity may be more limited than with ETFs or open-end mutual funds.
- Individual Equity Securities (Stocks)
  - Investments in individual stocks are subject to company-specific risk, market risk, and volatility risk. Factors such as earnings results, management changes, competitive pressures, or regulatory developments may negatively impact a company's stock price. Concentrated positions in individual securities may increase overall portfolio risk.
- Individual Fixed Income Securities (Bonds)
  - Bond investments are subject to interest rate risk, credit risk, inflation risk, and liquidity risk. Rising interest rates generally result in declining bond prices. Bonds issued by lower-quality or non-investment-grade issuers involve higher risk of default. The value of fixed income securities may also be adversely affected by changes in economic conditions or issuer financial health.
- Limited Partnerships and Private Investments
  - Limited partnerships and other private investments involve significant risks,

including illiquidity, lack of transparency, limited regulatory oversight, and long investment horizons. These investments may not be readily marketable, may involve capital calls, and may result in a total loss of invested capital. Valuations may be subjective and infrequent. Such investments are typically suitable only for investors who can bear substantial risk and limited liquidity.

- Separately Managed Accounts (SMAs)
    - Separately managed accounts are subject to market risk and strategy-specific risk based on the investment approach employed by the portfolio manager. Performance may vary materially from benchmarks or other accounts due to security selection, timing, or tax-management decisions. SMAs may also involve concentration risk, as portfolios may hold fewer securities than pooled investment vehicles.

General Risk Disclosure

Past performance is not indicative of future results. Economic conditions, market volatility, interest rate changes, inflation, geopolitical events, and other factors may adversely affect investment performance. Clients should consider their financial situation, investment objectives, time horizon, and risk tolerance before investing.

9) DISCIPLINARY INFORMATION

We do not have any legal or disciplinary events to disclose, including any criminal or civil actions, administrative proceedings with any regulatory agencies, or proceedings before any self-regulatory organization.

10) OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Our founder, Michael Corbett, is a CFA, CFP®, and CTFA. His outside business activities include: ambassador for the Navy SEAL Foundation and spends 3-4 hours per year during non-business hours on his foundation duties for which he is not-compensated; advisor to Biofire, a smart gun company in Colorado, and

spends 1-2 days a year providing advisory services at Biofire events for which he is compensated; and teaches 3-4 tactical and long-range shooting events per year for which he is compensated.

11) CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING

WealthEQ is a fiduciary which means we always act in our clients' best interests. We have adopted a Code of Ethics that governs our professional conduct. Our Code of Ethics is designed to ensure our actions are complying with applicable securities laws and provides general ethical guidelines and specific instructions regarding our duties. It covers a range of topics including fiduciary duty standards and our obligation to show undivided loyalty to clients, business conduct, confidentiality, gifts and entertainment, and personal securities trading.

A copy of our Code of Ethics is available to clients and prospective clients upon request. Requests should be directed to:

WealthEQ
1804 AlpineDr

Erie, Colorado 80516
Telephone:

(720)636-1998

Mike@wealth-eq.com

WealthEQ and related persons may purchase or sell securities that WealthEQ may also purchase and/or sell on behalf of some or all its advisory clients. We do not allow securities transaction in anticipation of a transaction on behalf of a client in such securities.

We do not engage in any personal trading practices that disadvantage the client, including front running trades.

12) BROKERAGE PRACTICES

We do receive research and other products or services from Charles Schwab in connection with client securities transactions ("soft dollar benefits").

We do not consider, in selecting or recommending broker-dealers, whether we or a related person receives client referrals from a broker-dealer or third party.

WealthEQ requires that its clients use Charles Schwab as custodian when engaged in a discretionary investment management relationship with WealthEQ. This requirement is for clients that utilize our Personal Chief Financial Officer or Captive Investment Management services. For Outsourced Chief Investment Officer (OCIO), clients can use existing custodians for non-discretionary investment advisory accounts but must use Charles Schwab for investment management accounts where WealthEQ has discretionary authority over the investments.

13) REVIEW OF ACCOUNTS

We review wealth plans and investment accounts internally on at least a quarterly basis for consistency with client investment strategy, asset allocation, risk tolerance, and performance. More frequent reviews may be triggered by changes in market or economic conditions, changes in specific investments in client accounts, and/or changes in a client's financial condition or investment objectives.

We default to at least one in-person or web-based meetings per year with the client. The agenda is different for our Personal CFO, OCIO, and Captive clients. In all cases, there is a mid-year investment review focused on investment performance which also serves as a general update to see if there are any changes in the client's situation. Our end of year is as follows:

- For Personal CFO, we review progress toward goals, financial statements, wealth plans, and annual investment performance vs. benchmarks.
- For OCIO, we host a comprehensive review with all family office advisors and stakeholders. The agenda covers portfolio performance at the manager and overall portfolio level, updates to individual/family situation that may affect current/future plans, and we conduct a post-mortem and/or pre-mortem of planning by WealthEQ and/or outside advisors.
- For Captive Investment Management, we conduct an annual review of portfolio performance, captive claims, and discuss current and/or future liabilities to ensure the portfolio is properly positioned and ample liquidity is available.

14) CLIENT REFERRALS AND OTHER COMPENSATION

Other than the soft dollar benefits disclosed in item 12 above, we do not receive any compensation for referrals, fee sharing, commissions, or any other compensation arrangements outside of the fee agreements we have with clients. We don't pay any third parties for referrals.

15) CUSTODY

WealthEQ does not accept or maintain direct custody of any client securities or funds. For Personal CFO, OCIO, and Captive Investment Management, WealthEQ has constructive custody. An RIA with constructive custody is required to have written authorization from the client to deduct fees form the account held with a qualified custodian, provide notice of fee deduction via an invoice to the qualified custodian and client, and the qualified custodian must send statements to the client showing all disbursements. Schwab, a qualified custodian, has custody of our clients' assets held in brokerage accounts. Schwab will send quarterly or monthly account statements directly to clients. Clients should carefully review those statements. Additionally, WealthEQ provides clients with various portfolio valuation, performance, and activity reports on a quarterly basis or more frequently, if desired. Clients have the option to receive these reports in hard copy, over a secure client portal, or both.

We urge clients to compare the account statements the receive from their qualified custodians with those they receive from us. There may be discrepancies between the reports due to various factors, such as (most commonly) timing of reporting (*e.g.*, trade-date reporting versus settlement-date reporting). If clients have any questions about their reports, they should contact Mike Corbett via phone or email.

16) INVESTMENT DISCRETION

We work with each client to create a customized IPS that sets investment parameters for us to follow when investing each client's portfolios.

Once we establish account parameters, we will have the authority to direct the investment and reinvestment of account assets (including rebalancing) and manage the client's account(s) within the agreed-upon investment parameters, and to determine pricing and timing of transactions, without the prior approval of the client. However, changes in asset classes, allocations within asset classes, and other investment guidelines and limitations will be made only with the client's prior approval.

For clients that choose discretionary investment management, WealthEQ will have the authority to execute trades, rebalance, change portfolio allocation, or buy/sell securities. For clients that choose non-discretionary investment advisory, such as offered with OCIO, WealthEQ will have the authority to instruct the external managers to conduct trades, change portfolio allocation, or buy/sell certain securities on the client's behalf via a limited power of attorney.

17) VOTING CLIENT SECURITIES

We do not have the authority to vote, as proxy, on our clients' securities, and clients will receive proxies or other solicitations directly from their custodian or transfer agent. However, if clients have any questions about a particular solicitation, they should contact Mike Corbett via phone or email.

18) FINANCIAL INFORMATION

We maintain accurate accounting records in compliance with U.S. GAAP under the accrual method.

We do not require or solicit prepayment of fees six months or more in advance and, as a result, are not required to include with this brochure a balance sheet for our most recent fiscal year.

We have never been the subject of a bankruptcy petition, nor do we have any financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

19) REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Neither WealthEQ nor Michael Corbett have ever been involved in an award

or been found liable in arbitration claim alleging damages in excess of $2500, involving any of the following:

- an investment or an investment-related business or activity;
- Fraud, false statement(s), or omissions;
- Theft, embezzlement, or other wrongful taking of property;
- Bribery, forgery, counterfeiting, or extortion; or
- Dishonest, unfair, or unethical practices.

Neither WealthEQ or Michael Corbett have ever been involved in an award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

- an investment or an investment-related business or activity;
- fraud, false statements), or omissions;
- theft, embezzlement, or other wrongful taking of property;
- bribery, forgery, counterfeiting, or extortion; or
- dishonest, unfair, or unethical practices.

Neither WealthEQ or Michael Corbett are involved in any relationship or arrangement with any issuer of securities that is not listed in Item 10 of Part 2A.