

Item 1: Cover Page

Alta Strada Wealth Partners, LLC

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Alta Strada Wealth Management

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Form ADV Part 2A – Firm Brochure

Dated: November 14, 2025

This Brochure provides information about the qualifications and business practices of Alta Strada Wealth Partners, LLC doing business as Alta Strada Wealth Management. If you have any questions about the contents of this Brochure, please contact us at (531) 229-1993. 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.

Alta Strada Wealth Partners, LLC is a registered investment adviser. Registration does not imply a certain level of skill or training.

Additional information about Alta Strada Wealth Partners, LLC also is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 337545.

Item 2: Material Changes

Since this is the first filing of the Form ADV Part 2A for Alta Strada Wealth Partners, LLC, there are no material changes to report. In the future, any material changes made during the year will be reported here.

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Item 4: Advisory Business

Description of Advisory Firm

Alta Strada Wealth Partners, LLC doing business as Alta Strada Wealth Management is an Investment Adviser principally located in the state of Nebraska. We are a limited liability company founded in June 2025. Alta Strada Wealth Partners, LLC became registered in 2025. Tyler D. Woods, Managing Partner and Chief Compliance Officer ("CCO"), and Norman Auger, Managing Partner, are the principal owners of the firm.

As used in this brochure, the words "ASWP", "we", "our firm", "Advisor" and "us" refer to Alta Strada Wealth Partners, LLC and the words "you", "your" and "Client" refer to you as either a client or prospective client of our firm.

Types of Advisory Services

Investment Management Services

Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as risk tolerance and tax considerations.

We primarily advise our Clients regarding investments in stocks, bonds, mutual funds, ETFs, U.S. government and municipal securities, and cash and cash equivalents. We may also provide advice regarding investments held in Client's portfolio at the inception of our advisory relationship and/or other investment types not listed above, at the Client's request.

When we provide investment management services, Clients grant us limited authority to buy and sell securities on a discretionary basis or non-discretionary basis. More information on our trading authority is explained in Item 16 of this Brochure. Clients may impose reasonable restrictions in writing on investing in certain securities, types of securities, or industry sectors.

When appropriate, we utilize the services of one or more independent investment managers or independent investment management programs ("Outside Managers") to assist with the management of Client accounts. The Outside Managers we recommend may engage our firm directly to provide sub-advisory services to client account(s) and/or may be accessible to our firm through an investment platform offered through your Custodian. We will continue to serve as Client's primary advisor for the ongoing monitoring of the account(s) and the determination of the suitability of the Outside Manager's overall investment program and/or strategies. We will recommend adjustments to your account(s) when we believe such changes are in your best interests. Our review process and analysis of Outside Managers is further discussed in Item 8 of this Brochure.

Altruist Model Marketplace

ASWP participates in the Model Marketplace of Altruist LLC, an SEC registered investment adviser and affiliate of Altruist Financial LLC, CRD No. 299398. ASWP may subscribe client accounts to model portfolios available through Altruist LLC's Model Marketplace, including Altruist LLC-generated portfolios and Third-Party Portfolios, for use by ASWP to assist it in managing or advising of client

accounts.

Management of Held Away Accounts

As part of our investment management services, we provide asset allocation review, rebalancing, and management services for accounts that are not held in custody by the qualified custodian(s) recommended by our firm. These services are provided through the account aggregation services of Absolute Capital Management and Future Capital. The service primarily applies to ERISA and non-ERISA plan assets such as 401(k)s and 403(b)s, and other assets that must be held in custody by the plan custodian(s). We regularly review the available investment options in these accounts, monitor them, and periodically rebalance and implement our strategies using different tools as necessary. If you elect to allow our firm to manage your assets through Absolute Capital Management or Future Capital, you will be notified via email when ASWP places trades in your held away account.

Financial Planning Services

Financial planning involves an evaluation of a Client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written report, providing the Client with a detailed financial plan designed to help achieve the Client's stated financial goals and objectives.

In general, the financial plan will address some or all of the following areas of concern. The Client and ASWP will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to children and grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes

by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Financial Planning Services are offered via an Ongoing and/or on a Project-Based engagement.

Ongoing Financial Planning. This service involves working one-on-one with a financial planner ("planner") over an extended period. Through this ongoing arrangement, Clients collaborate with the planner to develop and assist the Client in coordinating the implementation of their financial plan (the "plan") throughout the relationship.

Upon engaging the firm for financial planning, ASWP is responsible for obtaining and analyzing all necessary qualitative and quantitative information from the Client that is essential to understanding the Client's personal and financial circumstances; helping the Client identify, select, and prioritize certain financial goals while understanding the effect that pursuing one goal may have on other potential goals; assessing the Client's current course of action and alternative courses of action to identify required changes that provide the best opportunity for the Client to achieve their financial goals; developing and presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and periodic monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. The frequency and scope of plan reviews are determined by the Client's needs and the terms of the advisory agreement.

For our ongoing financial planning engagements, we will use client-provided information to identify the key facts and objectives, allowing us to prioritize next steps and applicable action items. Upon receipt of sufficient information, ASWP will prepare a written financial plan summarizing the client's objectives, goals, recommended action items, suggested next steps, and the basis for any material recommendations. This evolving financial plan may address some or all facets of the financial planning process. ASWP may update the plan as material information becomes available or as client circumstances change. The level of information and depth included at any time depend on the agreed-upon scope of the engagement and the material information provided by the client at the time of delivery.

ASWP seeks to obtain sufficient information to address goals, action items, and suggested Client actions in a timely manner. This may occur via our onboarding process, scheduled meetings, or other interactions with the Client. Clients are expected to update their advisor on any material changes that may impact their plan. ASWP processes are in place during Client onboarding to aid in the understanding of the Client facts and their priorities. ASWP requires one annual strategy meeting and generally offers an additional optional meeting, often focused on the topic jointly determined by the client and advisor to be that client's highest-priority planning area for the year. Clients will receive correspondence regarding financial topics, firm updates, commentary, financial education, and applicable deliverables that derive from meetings throughout the engagement.

These components require meaningful, ongoing communication between the Client and the planner to maintain a financial plan and implementation strategy that best support the Client's goals and objectives

Project-Based Financial Planning. We provide project-based financial planning services as a limited scope, one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues, and the engagement ends upon the delivery of the suggested actions the client could take to resolve their question or issue. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by ASWP. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

Estate Planning Services

Through our partnership with an independent third-party technology company, Wealth, Inc. ("Wealth"), we can facilitate the preparation of various estate planning documents for clients. Such services are generally separate from any investment management and/or financial planning services that we may render to a Client, and the exact scope of such estate planning services will depend on the nature of a Client's specific estate planning needs. As a condition of utilizing Wealth, you must agree to the terms and conditions, available at wealth.com. ASWP may pay for your access to Wealth. For the avoidance of doubt, neither

ASWP or Wealth renders legal advice or services. Wealth offers the ability to consult with licensed attorneys in various jurisdictions at an additional charge, and subject to additional terms and conditions. The fees associated with estate planning related services are separate and in addition to your financial planning or advisory fees and are disclosed in Item 5.

Recommendation of Fee-Based Annuities

We offer fee-based annuities to our clients to help meet their income, preservation and liquidity needs. Fee-based annuities are an integral part of our analysis when building long-term investment strategies. Through this service, we are able to provide clients access to income streams on a fee-only basis without paying commissions. We assist clients in the selection of appropriate annuity carriers, completing the carrier's applications, and requests for medical records and exams.

For insurance products, ASWP provides access to a platform of insurance products provided by DPL Financial Partners, LLC ("DPL"). The investor is under no obligation to use DPL's service, and may seek insurance advice from any licensed agent. The insurance products and fee structures available from DPL may differ from those available from other third-party insurance agents. The company recommends that the investor fully evaluate products and fee structures to determine which arrangements are most favorable to the investor prior to making an investment decision. The company does not receive compensation for insurance products selected by the investor, whether secured through DPL or any other agent.

Retirement Plan Consulting

Our firm provides retirement plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors or plan named fiduciaries in establishing, monitoring, and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: design of investment policy statement, investment review and recommendations, fee analysis, participant education, and vendor searches & analysis.

In providing retirement plan services, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly-traded REITs), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets").

Certain plans and/or clients that we may provide services to are regulated under the Employee Retirement Income Securities Act of 1974 ("ERISA"). We will provide employee benefit plan services to the plan sponsor and/or fiduciaries as described above for the fees set forth in Item 5 of this brochure. The services we provide are advisory in nature. We are not subject to any disqualifications under Section 411 of ERISA. In performing fiduciary services, we are acting as a fiduciary of the plan as defined in Section 3(21)(A)(ii) under ERISA.

Educational Seminars / Speaking Engagements

We may provide seminars for groups seeking general advice on investments and other areas of personal finance. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's need, nor does ASWP provide individualized investment advice to attendees during these seminars. Topics covered during educational seminars will be determined by the Client and ASWP.

Client Tailored Services and Client Imposed Restrictions

We tailor the delivery of our services to meet the individual needs of our Clients. We consult with Clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the Clients' investment and/or planning needs.

Clients are able to specify, within reason, any restrictions they would like to place as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to ASWP in writing. ASWP will notify Clients if they are unable to accommodate any requests.

From time to time, ASWP recommends third-party professionals such as attorneys, accountants, tax advisors, insurance agents, or other financial professionals. Clients are never obligated to utilize any third-party professional we recommend. ASWP is not affiliated with nor does ASWP receive any compensation from third-party professionals we may recommend.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

As of July 2025, ASWP has \$0 in discretionary and \$0 in non-discretionary assets under management.

Item 5: Fees and Compensation

Please note, unless a Client has received this brochure at least 48 hours prior to signing an Advisory Contract, the Advisory Contract may be terminated by the Client within five (5) business days of signing the Advisory Contract without penalty or incurring any fees. At no time do we require prepayment of \$1,200 or more six months or more in advance of rendering the services.

How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed Advisory Contract for more detailed information regarding the exact fees you will be paying. Fees are negotiable and some fees may vary by Client for similar services. No increase to the agreed-upon advisory fees outlined in the Advisory Contract shall occur without prior Client consent.

Investment Management Services

The fee is based on a percentage of assets under management and is negotiable. The annualized fees for investment management services are based on the following fee schedule:

Assets Under Management	Annual Advisory Fee
\$0 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.80%
\$3,000,001 - \$15,000,000	0.65%
\$15,000,000 and Above	0.45%

The annual advisory fee is paid quarterly in advance or arrears based on the value of Client's account(s) as of the last day of the prior or first day of the current billing period. The advisory fee is a blended tier. For example, for assets under management of \$1,000,000, a Client would pay 1.50% on the first \$500,000 and

1.00% on the remaining balance. The formula for the quarterly fee is determined by the following calculation: $((\$500,000 \times 1.50\%) + (\$500,000 \times 1.00\%)) \div 4$.

For Clients who have worked with an Associated Person of our firm previously, the Client will be referred to as a "legacy Client". The fee for a legacy client is a fixed percentage of assets under management not to exceed 1.50% and is negotiable based upon the Advisor's discretion. The exact advisory fee will be listed within the Advisory Agreement.

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. ASWP relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

If ASWP utilizes an Outside Manager, the above fee schedule includes the Outside Manager's fee. The Outside Manager will debit the Client's account for both the Outside Manager's fee, and ASWP's advisory fee, and will remit ASWP's fee to ASWP.

Ongoing Financial Planning

ASWP collects an initial fee, no greater than \$50,000. The initial fee covers the initial construction of the comprehensive financial plan. This work will commence immediately after the fee is paid, and the length of time required to complete and deliver the plan is dependent on several factors including the needs of the Client, the Client's ability to provide any necessary information and documentation, as well as the complexity of their financial situation. Advisor may reduce or waive the initial fee at the Advisor's discretion.

In addition, we charge a recurring fixed fee for Ongoing Financial Planning. Fees are paid quarterly in advance, ranging from \$5,000 to \$50,000. The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract.

Project-Based Financial Planning

ASWP charges either a fixed or hourly fee for Project-Based Financial Planning. Fixed fee rates range between \$5,000 to \$50,000. Our hourly rate is \$400.

The fee range is dependent upon variables including the specific needs of the Client, complexity, estimated time, research, and resources required to provide services to you, among other factors we deem relevant. Fees are negotiable and the final agreed upon fee will be outlined in your Advisory Contract. ASWP may request a portion of the fee be collected in advance with the remainder due upon completion of the services.

Estate Planning Services

The fees for estate planning through Wealth.com will be determined based on the complexity of the planning services needed. Fees will range from \$1,000 to \$30,000. The fees may be negotiable in certain cases, will be agreed to at the start of the engagement, and are due at the start of the engagement. If outside referral services other than Wealth.com are utilized in estate planning, the client will pay those service providers directly. Clients are not required to utilize any third-party products or services that we may recommend, and they may receive similar services from other professionals at a similar or lower cost.

Recommendation of Fee-Based Annuities Fees

The fee for fee-based insurance products is based on a percentage of the account value and correspond to the following fee schedule:

Assets Under Advisement	Annual Advisory Fee
\$0 - \$500,000	1.50%
\$500,001 - \$1,000,000	1.00%
\$1,000,001 - \$3,000,000	0.80%
\$3,000,001 - \$15,000,000	0.65%
\$15,000,000 and Above	0.45%

The annual advisory fee is paid quarterly in advance or arrears the value of Client's account(s) as of the last day of the billing period based on the average daily balance of the Client's account(s). The advisory fee is a blended tier. For example, for assets under advisement of \$1,000,000, a Client would pay 1.50% on the first \$500,000 and 1.00% on the remaining balance. The formula for the quarterly fee is determined by the following calculation: $((\$500,000 \times 1.50\%) + (\$500,000 \times 1.00\%)) \div 4$.

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. ASWP relies on the valuation as provided by Client's custodian in determining assets under management.

Retirement Plan Consulting

We charge a flat 0.75% of assets under management for Retirement Plan Consulting. The annual advisory fee is paid quarterly in advance based on the average daily balance of the Client's account(s). The fee is negotiable.

This does not include fees to other parties, such as record keepers, custodians, or third-party administrators. ASWP relies on the valuation as provided by Client's custodian in determining assets under management. Our advisory fee is prorated for any partial billing periods occurring during the engagement, including the initial and terminating billing periods.

Educational Seminars / Speaking Engagements

Seminars and speaking engagements are offered to organizations and the public on a variety of financial topics. Fees range from \$500 to \$50,000 per seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. ASWP collects half of the fee in advance with the remainder due at the conclusion of the Seminar. Advisor offers its services in a virtual or in-person setting. Should the event require travel arrangements, both parties must agree to the terms of travel (i.e., cost, distance, hotel arrangements) at the start of the engagement.

Fee Payment

For Investment Management services, we deduct our advisory fee from one or more account(s) held at an unaffiliated third-party custodian, as directed by the Client. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their payment information to pay their fee. We do not have access to the Client's banking or credit information at any time. The Client will be provided with their own secure portal in order to make payments.

For held-away assets managed through Absolute Capital Management or Future Capital, ASWP does not have the ability to deduct fees from the account. As such, fees for the management of held-away assets will either be paid directly by the client or deducted from another eligible account that we manage for the Client at the qualified custodian(s).

For Financial Planning services and Educational Seminars / Speaking Engagements, fees are paid by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their banking information and pay their fee. We do not have access to the Client's banking information at any time. The Client will be provided with their own secure portal in order to make payments.

For Retirement Plan services, fees are either paid directly by the plan sponsor or deducted directly from the plan assets by the custodian. Please refer to Item 15 of this Brochure regarding our policy on direct fee deduction. Clients may also pay by electronic funds transfer (EFT) or check. We use an independent third party payment processor in which the Client can securely input their payment information to pay their fee. We do not have access to the Client's banking or credit information at any time. The Client will be provided with their own secure portal in order to make payments.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending custodians for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

When we utilize Separately Managed Account "SMA" portfolios offered by various Sub-Advisors, their management fees and any fees for trading in securities held within those SMAs are separate and in addition to any advisory fees we charge for our services. These fees are disclosed to clients at the start of an engagement if/when selecting an appropriate sub-advisor and SMA program.

For Clients engaged in an Altruist One subscription, fees will be debited from the Adviser's house account or passed on to the Client for payment from the Client's account. If an Adviser chooses to pass the Altruist One Fee for payment from a Client's account and the Client or RIA closes, liquidates, or archives the Client's account prior to paying any accrued Subscription Fee, Altruist will debit the unpaid Subscription Fee from the Adviser's house account. Advisers and/or Clients should refer to the Altruist Financial LLC Fee Schedule for complete details on fees that apply to Altruist brokerage accounts and services.

Clients may incur fees from third-party professionals such as accountants and attorneys that ASWP may recommend, upon Client's request. If Client wishes for ASWP to manage held-away accounts, Clients may be subject to platform fees or other third-party fees. Such fees are separate and distinct from ASWP's advisory fees.

Terminations and Refunds

For Investment Management services and Retirement Plan Services, the Advisory Contract may be terminated with written notice 30 calendar days in advance. Upon termination of the Advisory Contract, a prorated refund will be provided to the Client.

For Ongoing Financial Planning services, the Advisory Contract may be terminated with written notice 30 calendar days in advance. In the event of early termination prior to the initial plan being delivered, fees will be prorated based upon the percentage of the work done up to the date of termination and any unearned fees will be refunded to the Client. Upon termination, the fee will be prorated based upon the number of days in the billing period and refunded to the Client.

For Project-Based Financial Planning services, this service is not an ongoing engagement, thus upon receipt of the final fees, the Advisory Contract will automatically be terminated. Clients may terminate at any time provided written notice. If fees are paid in advance, a prorated refund will be given, if applicable, upon termination of the Advisory Contract for any unearned fee. For fees paid in arrears, Client shall be charged a pro-rata fee based upon the percentage of the work done up to the date of termination.

For Educational Seminars and Speaking Engagements, Advisor or Clients may cancel the event with 30 days' advance written notice. Should the Client cancel the event within 30 days of the event (with the exception of weather or similar unforeseen causes), the Client will be responsible for reimbursement of any non-refundable travel expenses already incurred and a prorated fee for any work conducted in preparation of the event, based on the percentage of work done and the flat fee agreed upon by both parties. Should any fees collected in advance exceed the amount of work conducted, Advisor will provide a prorated refund within 30 days from the notice of termination.

Sale of Securities or Other Investment Products

Advisor and its supervised persons do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning and investment management services to individuals, high net-worth individuals, pension and profit sharing plans, charitable organizations, and corporations or other businesses.

We do not have a minimum account size requirement to open or maintain an account.

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

Below is a brief description of our methods of analysis and primary investment strategies.

Methods of Analysis

Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that the information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Technical analysis involves using chart patterns, momentum, volume, and relative strength in an effort to pick sectors that may outperform market indices. However, there is no assurance of accurate forecasts or that trends will develop in the markets we follow. In the past, there have been periods without discernible trends and similar periods will presumably occur in the future. Even where major trends develop, outside factors like government intervention could potentially shorten them.

Furthermore, one limitation of technical analysis is that it requires price movement data, which can translate into price trends sufficient to dictate a market entry or exit decision. In a trendless or erratic market, a technical method may fail to identify trends requiring action. In addition, technical methods may overreact to minor price movements, establishing positions contrary to overall price trends, which may result in losses. Finally, a technical trading method may underperform other trading methods when fundamental factors dominate price moves within a given market.

Cyclical analysis is a type of technical analysis that involves evaluating recurring price patterns and trends based upon business cycles. Economic/business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. The lengths of economic cycles may be difficult to predict with accuracy and therefore the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

Charting analysis involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends. Charts may not accurately predict future price movements. Current prices of securities may not reflect all information about the security and day-to-day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

Modern Portfolio Theory (MPT)

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Risks Associated with Modern Portfolio Theory: Market risk is that part of a security's risk that is common to all securities of the same general class (stocks and bonds) and thus cannot be eliminated by diversification.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the Client's portfolio. In addition, we monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less suitable for the Client's portfolio.

Use of Outside Managers: We may refer clients to independent investment managers or independent investment management programs ("Outside Managers") offered by various sub-advisors to manage portions of a client's portfolio. The decision to use an Outside Manager is based on our assessment of the client's needs and objectives, and whether these solutions may be more appropriate than mutual funds or ETFs for certain portfolio allocations. Our due diligence and ongoing monitoring of Outside Managers involves evaluating their experience, expertise, investment philosophies, and historical performance to assess their ability to manage investments over various market cycles. We also review and monitor their underlying holdings, strategies, concentrations, and leverage as part of our periodic risk assessments. As part of our diligence process, we assess compliance infrastructure and enterprise-level business risks to help identify any operational concerns. Clients should be aware that past success by an Outside Manager or sub-advisor does not guarantee future performance. There is also a risk that these managers may deviate from their stated investment mandates, potentially making the strategy less suitable for our clients. Furthermore, because we do not oversee the daily business or compliance operations of these third parties, we may be unaware of deficiencies in internal controls that could lead to business, regulatory, or reputational risks.

Investment Strategies

Asset Allocation

In implementing our Clients' investment strategy, we begin by attempting to identify an appropriate ratio of equities, fixed income, and cash (i.e. "asset allocation") suitable to the Client's investment goals and risk tolerance.

A risk of asset allocation is that the Client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of equities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the Client's goals. We attempt to closely monitor our asset allocation models and make changes periodically to keep in line with the target risk tolerance model.

Passive and Active Investment Management

We may choose investment vehicles that are considered passive, active, or a combination of both styles.

Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio.

Active investing involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark. Actively managed funds are also designed to reduce volatility and risk.

We may engage in both passive and active investing in Client's portfolio. However, we strive to construct portfolios of funds and individual securities that we believe will have the greatest probability for achieving our Clients' personal financial goals with the least amount of volatility and risk rather than attempt to outperform an arbitrary index or benchmark.

Specific investment selections are based on a number of factors that we evaluate in order to select, what we believe to be, the highest quality funds or individual securities for our Clients. These factors include but are not limited to underlying holdings of funds, percentage weighting of holdings within funds, liquidity, tax efficiency, bid/ask spreads, and other smart/strategic beta factors. These factors may or may not result in the lowest cost ETFs and mutual funds available when utilizing funds in a Client's portfolio, but we strive to keep internal fund expenses as low as possible.

Socially Responsible Investing

We may utilize various socially conscious investment approaches if a Client desires. ASWP may construct portfolios that utilize mutual funds, ETFs, or individual securities with the purpose of incorporating socially conscious principles into a Client's portfolio. These portfolios may sometimes also be customized to reflect the personal values of each individual, family, or organization. This allows our Clients to invest in a way that aligns with their values. ASWP may rely on mutual funds and ETFs that incorporate Environmental, Social and Governance ("ESG") research as well as positive and negative screens related to specific business practices to determine the quality of an investment on values-based merits. Additionally, ASWP may construct portfolios of individual securities in order to provide Clients with a greater degree of control over the socially conscious strategies they are utilizing. ASWP relies on third-party research when constructing portfolios of individual securities with socially conscious considerations.

If you request your portfolio to be invested according to socially conscious principles, you should note that returns on investments of this type may be limited and because of this limitation you may not be able to be as well diversified among various asset classes. The number of publicly traded companies that meet socially conscious investment parameters is also limited, and due to this limitation, there is a probability of similarity or overlap of holdings, especially among socially conscious mutual funds or ETFs. Therefore, there could be a more pronounced positive or negative impact on a socially conscious portfolio, which could be more volatile than a fully diversified portfolio.

Long-term/Short-term purchases

We purchase securities and generally hold them in the Client's account for a year or longer. Short-term purchases may be employed as appropriate when:

- We believe the securities to be currently undervalued, and/or
- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and

medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: Actively managed mutual funds tend to have a higher turnover rate than passive funds. A high portfolio turnover would result in higher transaction costs and in higher taxes when shares are held in a taxable account. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower-quality debt securities are more susceptible to these problems and their value may be more volatile.

Cryptocurrency and Other Digital Assets: Often referred to as "virtual currency", "digital currency," or "digital assets," is designed to act as a medium of exchange. Cryptocurrency is an emerging asset class. There are thousands of cryptocurrencies, including tokens, coins, and other crypto assets. Certain of the firm's clients may have exposure to cryptocurrency, directly or indirectly through an investment such as an ETF or other investment vehicles. Cryptocurrency operates without central authority or banks and is not backed by any government. Cryptocurrencies may experience very high volatility and related investment vehicles may be affected by such volatility. As a result of holding cryptocurrency, certain of the firm's clients may also trade at a significant premium or discount to NAV. Cryptocurrency is also not legal tender. Federal, state or foreign governments may restrict the use and exchange of cryptocurrency, and regulation in the U.S. is still developing. The market price of many cryptocurrencies has been subject to extreme fluctuations. If cryptocurrency markets continue to be subject to sharp fluctuations, investors may experience losses if the value of the client's investments decline.

Similar to fiat currencies (i.e., a currency that is backed by a central bank or a national, supra-national or quasi national organization), cryptocurrencies are susceptible to theft, loss and destruction. Cryptocurrency wallets can be lost, stolen, damaged, or destroyed, or users can become permanently locked out of their

digital wallets. In such a case, recovery of the cryptocurrency is impossible. Cryptocurrency exchanges and other trading venues on which cryptocurrencies trade are relatively new and, in most cases, largely unregulated and may therefore be more exposed to fraud and failure than established, regulated exchanges for securities, derivatives and other currencies. Cryptocurrency exchanges may stop operating or permanently shut down due to fraud, technical glitches, hackers or malware. Cryptocurrency held in custody are not guaranteed and may not be subject to the insurance protections of the Federal Deposit Insurance Corporation (FDIC) or the Securities Investor Protection Corporation (SIPC). Exchanges often charge fees as a percentage of each transaction and/or spreads for matching buyers with sellers. Due to relatively recent launches, most cryptocurrencies have a limited trading history, making it difficult for investors to evaluate investments. Generally, cryptocurrency transactions are irreversible such that an improper transfer can only be undone by the receiver of the cryptocurrency agreeing to return the cryptocurrency to the original sender. Cryptocurrencies are highly dependent on their developers and there is no guarantee that development will continue or that developers will not abandon a project with little or no notice. Third parties may assert intellectual property claims relating to the holding and transfer of digital assets, including cryptocurrencies, and their source code. Any threatened action that reduces confidence in a network's long-term ability to hold and transfer cryptocurrency may affect investments in cryptocurrencies. Many significant aspects of the U.S. federal income tax treatment of investments in cryptocurrency are uncertain and an investment in cryptocurrency may produce income that is not treated as qualifying income for purposes of the income test applicable to regulated investment companies. Certain cryptocurrency investments may be treated as a grantor trust for U.S. federal income tax purposes, and an investment by the firm's clients in such a vehicle will generally be treated as a direct investment in cryptocurrency for tax purposes and "flow-through" to the underlying investors.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above (premium) or below (discount) their net asset value and an ETF purchased at a premium may ultimately be sold at a discount; (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to

large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Fee-Based Annuities Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet a requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Mutual Funds When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Item 9: Disciplinary Information

Criminal or Civil Actions

ASWP and its management persons have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

ASWP and its management persons have not been involved in any administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

ASWP and its management persons have not been involved in any self-regulatory organization (SRO) proceedings.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer Affiliation

Neither ASWP or its management persons is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Other Affiliations

Neither ASWP or its management persons is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

Related Persons

Neither ASWP or its management persons have any relationship or arrangement with any outside financial industry related parties.

Tyler D. Woods and Norman Auger are currently licensed insurance agents, however, neither sells any insurance products, and is not affiliated with any insurance companies. Neither Mr. Woods nor Mr. Auger will sell any insurance products to clients or prospective clients of ASWP.

Recommendations or Selections of Other Investment Advisers

ASWP recommends Clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, Clients pay one single fee (as noted in Item 5), however our fee is separate to the Outside Managers compensation and the Outside Manager will deduct the single fee from client account(s) and remit our advisory fee to us. In addition, Clients will receive a copy of the Outside Manager's Form ADV 2A, Firm Brochure, which also describes the Outside Manager's fee. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Moreover, ASWP will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm has a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This Code of Ethics does not attempt to identify all possible conflicts of interest, and compliance with each of its specific provisions will not shield our firm or its access persons from liability for misconduct that violates a fiduciary duty to our Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Access persons shall offer and provide professional services with integrity.
- Objectivity - Access persons shall be objective in providing professional services to Clients.
- Competence - Access persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Access persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Access persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Access persons conduct in all matters shall reflect the credit of the profession.
- Diligence - Access persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its access persons, or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, principal transaction, among others.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm, its access persons, and its related persons may buy or sell securities similar to, or different from, those we recommend to Clients. In an effort to reduce or eliminate certain conflicts of interest, our Code of Ethics may require that we restrict or prohibit access persons' transactions in specific reportable securities. Any exceptions or trading pre-clearance must be approved by ASWP's Chief Compliance Officer in advance of the transaction in an account. ASWP maintains a copy of access persons' personal securities transactions as required.

Trading Securities At/Around the Same Time as Client's Securities

From time to time our firm, its access persons, or its related persons may buy or sell securities for themselves at or around the same time as they buy or sell securities for Clients' account(s). To address this conflict, it is our policy that neither our firm or access persons shall have priority over Clients' accounts in the purchase or sale of securities.

Item 12: Brokerage Practices

Factors Used to Select Custodians

In recommending custodians, we have an obligation to seek the "best execution" of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the custodian's services. The factors we consider when evaluating a custodian for best execution include, without limitation, the custodian's:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody);
- Capability to execute, clear, and settle trades (buy and sell securities for your account);
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices;
- Reputation, financial strength, security and stability;
- Prior service to us and our clients.

With this in consideration, our firm recommends Altruist Financial LLC ("Altruist"), an independent and unaffiliated SEC registered broker-dealer firm and member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC").

Research and Other Soft-Dollar Benefits

We do not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, Altruist may provide us with certain services that may benefit us.

ASWP offers investment advisory services through the custodial platform offered by Altruist Financial LLC, an unaffiliated SEC-registered broker-dealer and FINRA/SIPC member ("Altruist"). Custody, clearing, and execution services are provided by Altruist as a self-clearing broker-dealer. ASWP's clients establish brokerage accounts through Altruist. ASWP maintains an institutional relationship with Altruist whereby Altruist provides certain benefits to ASWP, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit ASWP and its clients. ASWP is not affiliated with Altruist.

Brokerage for Client Referrals

We receive no referrals from a custodian, broker-dealer or third party in exchange for using that custodian, broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

Our firm recommends Clients establish account(s) at Altruist to execute transactions through. We will assist with establishing your account(s) at Altruist, however, we will not have the authority to open accounts on the Client's behalf. Not all investment advisers require their Clients to use their recommended custodian. By recommending that Clients use Altruist, we may be unable to achieve most favorable execution of Client transactions, and this practice may cost Clients more money. We base our recommendations on the factors disclosed in Item 12 herein and will only recommend custodians if we believe it's in the best interest of the Client.

If Clients do not wish to utilize our recommended custodian, we permit Clients to direct brokerage. We will be added to your account through a limited trading authority. However, due to restraints from not having access to an institutional platform, we are unable to achieve most favorable execution of Client transactions. Clients directing brokerage may cost Clients more money. For example, in a directed brokerage account, the Client may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or the Client may receive a higher transaction price at their selected custodian versus our recommended custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, we combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or access persons may participate in block trading with your accounts; however, they will not be given preferential treatment.

Outside Managers used by ASWP may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Periodic Reviews

A representative of ASWP, such as Norman Auger or Tyler D. Woods, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. ASWP does not provide specific reports to Clients, other than financial plans. Clients who engage us for investment management services will have their account(s) reviewed regularly on a quarterly basis by Mr. Auger or Mr. Woods. The account(s) are reviewed with regards to the Client's investment objectives and risk tolerance levels.

Triggers of Reviews

Events that may trigger a special review would be unusual performance, addition or deletions of Client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Review Reports

Clients will receive trade confirmations from the custodian(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

ASWP does not provide written performance or holdings reports to Investment Management Clients outside of what is provided directly by their custodian.

Item 14: Client Referrals and Other Compensation

Compensation Received by Alta Strada Wealth Partners, LLC

ASWP may recommend the use of independent investment managers or independent investment management programs ("Outside Managers") as part of our asset allocation and investment strategy. In these cases, ASWP will share in the compensation received by the Outside Manager. The compensation arrangement presents a conflict of interest as our compensation will differ depending upon our individual agreement with each Outside Manager, giving us an incentive to recommend Outside Managers with whom we have more favorable compensation arrangements. Clients are under no obligation to use the services of a recommended Outside Manager.

We have entered into and are currently a party to promoter's agreements whereby we receive payment for referring clients to another business or related party, in accordance with the requirements of Rule 206(4)-1 of the Advisers Act and any corresponding state securities law requirements.

Client Referrals from Solicitors

ASWP does not, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

All accounts are held by an independent Custodian selected by the Client. With the exception of ASWP's ability to debit fees, and the ability to disburse or transfer certain funds to third parties pursuant to Standing Letters of Authorization executed by Clients, ASWP does not otherwise have custody of the assets in the account.

We urge you to carefully review custodial statements and compare them to the account invoices or reports that we may provide to you and notify us of any discrepancies. Clients are responsible for verifying the accuracy of these fees as listed on the custodian's brokerage statement as the custodian does not assume

this responsibility. Our invoices or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

ASWP can establish a standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client. With a SLOA a client can typically authorize first-party and/or third-party transfers. If transfers are third-party, ASWP complies with each of the requirements and conditions enumerated below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes ASWP, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
5. ASWP has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. ASWP maintains records showing that the third party is not a related party of ASWP or located at the same address as ASWP.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, ASWP has discretionary authority and limited power of attorney to determine the securities and the amount of securities to be bought or sold for a Client's account without having to obtain prior Client approval for each transaction. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account(s). Additionally, the discretionary relationship will be outlined in the Advisory Contract and signed by the Client. Clients may limit our discretion by requesting certain restrictions on investments. However, approval of such requests are at the firm's sole discretion.

If ASWP has engaged an Outside Manager to assist with the management of Client's portfolio, ASWP has the discretion to direct the Outside Manager to buy or sell securities for Client's portfolio without obtaining prior Client approval for each transaction.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications

relating to the Client's investment assets. If the Client has any questions on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our Clients, nor have we been the subject of any bankruptcy proceeding. We do not have custody of Client funds or securities, except as disclosed in Item 15 above, or require or solicit prepayment of more than \$1,200 in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Tyler D. Woods and Norman Auger serve as ASWP's principals. Information about Mr. Wood's or Mr. Auger's education, business background, and outside business activities can be found in his ADV Part 2B, Brochure Supplement attached to this Brochure.

Outside Business

All outside business information, if applicable, of ASWP is disclosed in Item 10 of this Brochure.

Performance-Based Fees

Neither ASWP nor management persons are compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at ASWP has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have with Issuers of Securities

Neither ASWP nor management persons have any relationship or arrangement with issuers of securities.

Item 1: Cover Page

Alta Strada Wealth Management

1601 Pawnee St., Unit 2
Lincoln, NE 68520
(531) 229-1993

Form ADV Part 2B – Brochure Supplement

Dated: November 14, 2025

For

Tyler D. Woods

Managing Partner, Wealth Advisor and Chief Compliance Officer

This brochure supplement provides information about Tyler D. Woods that supplements the Alta Strada Wealth Partners, LLC doing business as Alta Strada Wealth Management (“ASWP”) brochure. You should have received a copy of that brochure. Please contact Tyler D. Woods if you did not receive ASWP’s brochure or if you have any questions about the contents of this supplement.

Additional information about Tyler D. Woods is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 6633341.

Item 2: Educational Background and Business Experience

Tyler D. Woods

Born: 1993

Educational Background

- 2015 – B.B.A Finance, University of Iowa

Business Experience

- 06/2025 – Present, Alta Strada Wealth Partners, LLC, Managing Partner, Wealth Advisor and CCO
- 01/2023 – 08/2025, LPL Financial LLC, Registered Representative
- 09/2022 – 12/2022, Securities America Advisors, IAR
- 09/2022 – 12/2022, Securities America, Inc., Registered Employee
- 11/2021 – 09/2022, Brinker Capital Securities LLC, Senior Trader
- 11/2019 – 09/2022, Orion Portfolio Solutions, LLC, Senior Trader
- 08/2018 – 11/2019, Securities America Advisors, IAR
- 06/2016 – 08/2018, Securities America, Inc., Registered Employee
- 10/2015 – 05/2016, Student
- 05/2015 – 10/2015, Edwards Auto Group, Finance Trainee

Professional Designation(s)

Certified Plan Fiduciary Advisor (CPFA): Federal law regulates standards of conduct for those who manage qualified retirement plans. Plan advisers who sell and service these plans must act in accordance with these basic fiduciary principles.

The Certified Plan Fiduciary Adviser (CPFA) credential demonstrates an adviser's knowledge of, expertise in, and commitment to working with retirement plans. Plan advisers who earn their CPFA demonstrate the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities.

To attain designation of CPFA, an individual must:

- Education – The CPFA Coursework covers four key areas:
 1. ERISA Fiduciary Roles and Responsibilities
 2. ERISA Fiduciary Oversight
 3. ERISA Plan Investment Management
 4. ERISA Plan Management
- The CPFA exam includes 75 multiple choice questions for which a candidate will have 3 hours to complete.
- Continuing Education – In order to maintain credential(s), the candidate must earn 20 CE credits every two-year cycle. Two (2) of the 20 CE credits must be on ethics/professionalism topics.

Behavioral Financial Advisor™ (BFA): The Behavioral Financial Advisor™ and BFA™ are professional certification marks granted in the United States by Kaplan Professional Academy. The BFA™ certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold BFA™ certification. To attain the right to use the BFA™ marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete a course of study addressing the psychological, physiological, and behavioral characteristics that affect financial planning, both as the advisor and for the clients. Kaplan

Professional Academy subject areas for the BFA™ include: psychology of behavior, the certainty of uncertainty, behavioral financial advice, aligning values, and financial planning as it correlates with these subjects.

- Examination – Pass the comprehensive BFA™ Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose behavioral financial advising issues and apply one's knowledge of behavioral finance to real-world and client-specific circumstances.

Individuals who become certified must complete the following ongoing education requirements in order to maintain the right to continue to use the BFA™ marks:

- Continuing Education – Complete 20 hours of continuing education hours every two years to maintain competence and keep up with developments in the financial planning and behavioral financial advising fields.

Item 3: Disciplinary Information

Tyler D. Woods has never been involved in any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, or other hearings or formal adjudications.

Item 4: Other Business Activities

Tyler D. Woods is not engaged in other business activities.

Item 5: Additional Compensation

Tyler D. Woods does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through ASWP.

Item 6: Supervision

Tyler D. Woods is Co-Owner and the Chief Compliance Officer of ASWP. In this role, Mr. Woods supervises the advisory activities of ASWP and implementation of the firm's compliance program. Mr. Woods is bound by and will adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Mr. Woods by calling the phone number listed on the cover page of this brochure supplement.

Norman R. Auger III, Managing Partner of ASWP, supervises Mr. Woods' advisory activities. Mr. Auger can be reached by calling the phone number listed on the cover page of this brochure supplement.

Item 7: Requirements for State Registered Advisers

Tyler D. Woods has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Item 1: Cover Page

Alta Strada Wealth Management

1601 Pawnee St., Unit 2
Lincoln, NE 68520
(531) 229-1993

Form ADV Part 2B – Brochure Supplement

Dated: November 14, 2025

For

Norman R. Auger III

Managing Partner and Wealth Advisor

This brochure supplement provides information about Norman R. Auger III that supplements the Alta Strada Wealth Partners, LLC doing business as Alta Strada Wealth Management (“ASWP”) brochure. You should have received a copy of that brochure. Please contact Norman R. Auger III if you did not receive ASWP’s brochure or if you have any questions about the contents of this supplement.

Additional information about Norman R. Auger III is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 2434378.

Item 2: Educational Background and Business Experience

Norman R. Auger III

Born: 1967

Educational Background

- 1993 - BS, Aeronautical Studies, University of North Dakota

Business Experience

- 11/2025 – Present, Alta Strada Wealth Partners, LLC, Managing Partner/Wealth Advisor
- 02/2020 – 11/2025, LPL Financial LLC, Registered Representative
- 05/2009 - 02/2020, North Capital, Financial Advisor
- 05/2009 - 02/2020, Wells Fargo Advisors Financial Network LLC, Registered Representative

Professional Designation(s)

Certified Plan Fiduciary Advisor (CPFA): Federal law regulates standards of conduct for those who manage qualified retirement plans. Plan advisers who sell and service these plans must act in accordance with these basic fiduciary principles.

The Certified Plan Fiduciary Adviser (CPFA) credential demonstrates an adviser's knowledge of, expertise in, and commitment to working with retirement plans. Plan advisers who earn their CPFA demonstrate the expertise required to act as a plan fiduciary or help plan fiduciaries manage their roles and responsibilities.

To attain designation of CPFA, an individual must:

- Education – The CPFA Coursework covers four key areas:
 1. ERISA Fiduciary Roles and Responsibilities
 2. ERISA Fiduciary Oversight
 3. ERISA Plan Investment Management
 4. ERISA Plan Management
- The CPFA exam includes 75 multiple choice questions for which a candidate will have 3 hours to complete.
- Continuing Education – In order to maintain credential(s), the candidate must earn 20 CE credits every two-year cycle. Two (2) of the 20 CE credits must be on ethics/professionalism topics.

Item 3: Disciplinary Information

Norman R. Auger III has never been involved in any criminal or civil actions, administrative proceedings, self-regulatory organization (SRO) proceedings, or other hearings or formal adjudications.

Item 4: Other Business Activities

Norman R. Auger III is not engaged in other business activities.

Item 5: Additional Compensation

Norman R. Auger III does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through ASWP.

Item 6: Supervision

Norman R. Auger III is a Managing Partner of ASWP. In this role, Mr. Auger is responsible for monitoring Client portfolios for investment objectives and other supervisory reviews. Mr. Auger is bound by and will

adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Mr. Auger by calling the phone number listed on the cover page of this brochure supplement.

Tyler D. Woods, Managing Partner and Chief Compliance Officer of ASWP, supervises Mr. Auger's advisory activities. Mr. Woods can be reached by calling the phone number listed on the cover page of this brochure supplement.

Item 7: Requirements for State Registered Advisers

Norman R. Auger III has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.