Item 1: Cover Page

Toft

Toft Wealth, LLC
718 Osage St
Normal, IL 61761

Additional Location:
216 E Grove St, Suite 1902
Bloomington, IL 61701

(309) 718-8884
https://toftwealth.com

Form ADV Part 2A – Firm Brochure

Dated: September 18, 2026

This Brochure provides information about the qualifications and business practices of Toft Wealth, LLC. If you have any questions about the contents of this Brochure, please contact us at (309) 718-8884 and/or clark@toftwealth.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.

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

Additional information about Toft Wealth, LLC also is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, 343372.

Item 2: Material Changes

This Brochure, dated September 18, 2026, amends our Brochure dated August 31, 2026. Toft Wealth, LLC's registration was approved on August 24, 2026, and we have not yet filed an annual updating amendment. The following material changes have been made since our Brochure dated August 31, 2026:

- Item 1: The address of the Advisor's branch office has been updated to include the suite number: 216 E Grove St, Suite 1902, Bloomington, IL 61701.
- Item 4: Pro Bono Financial Planning has been added as a limited, no-cost, project-based service, with corresponding fee disclosure in Item 5.
- Item 4: The description of Standalone Financial Planning has been clarified regarding the form and scope of written planning deliverables provided to Clients.
- Item 5: The Wealth Management fee schedule has been revised. The stated percentage rates remain unchanged, but the asset breakpoints at which certain reduced rates apply have been increased. Under the revised schedule, 0.75% applies above $1,000,000, 0.55% above $5,000,000, 0.40% above $10,000,000, and 0.30% above $25,000,000. A Client with more than $3,000,000 of assets under management will generally pay a higher annual fee than under the prior schedule.
- Item 5: The annual fee range for Ongoing Financial Planning has been revised from $3,000–$25,000 to $3,000–$40,000.
- Item 5: The fixed-fee range for Project-Based Financial Planning has been revised from $0–$10,000 to $3,000–$12,000.

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Toft Wealth, LLC.

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Item 4: Advisory Business

Description of Advisory Firm

Toft Wealth, LLC is an investment adviser principally located in the state of Illinois. We are a limited liability company. Toft Wealth, LLC was founded in June 2026. Toft Wealth, LLC became registered in 2026. Clark Purdy is the principal owner and Chief Compliance Officer (“CCO”).

As used in this brochure, the words “Toft”, "we", "our firm", “Advisor” and "us" refer to Toft Wealth, 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

Toft is a fee-only firm, meaning the only compensation we receive is from our Clients for our services. From time to time, Toft 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. Toft is not affiliated with nor does Toft receive any compensation from third-party professionals we may recommend.

Wealth Management Services

Wealth Management encompasses investment management services and financial planning 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. 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. We may engage an Outside Manager we recommend to

provide sub-advisory services to client account(s), and/or the Outside Manager 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.

Dimensional Fund Advisors LP: Toft may utilize model portfolios made available by Dimensional Fund Advisors LP ("Dimensional"), including Dimensional Wealth Models. Dimensional Wealth Models provide model asset allocations utilizing Dimensional investment funds and are designed to address a range of investment goals, risk profiles, and investor preferences. Toft may use a Dimensional Wealth Model as a framework for constructing a Client's portfolio and may customize the model based on the Client's individual investment objectives, risk tolerance, financial circumstances, preferences, and/or reasonable investment restrictions. Toft retains responsibility for determining whether a Dimensional Wealth Model is appropriate for a Client and maintains control over the implementation of the model, including whether and when to rebalance the Client's portfolio and whether to implement changes to the model. Clients are not required to invest using Dimensional Wealth Models.

Separately Managed Accounts (SMAs): When appropriate to the management of a client's portfolio we will engage with sub-advisers through the use of Separately Managed Accounts "SMAs" where a portion of the client's account(s) are allocated to one or more professionally managed fixed income and/or equity strategy models. We will work with the client to select and determine the appropriate allocation for any SMAs used as part of their portfolio and will assist the client with completing any of the sub-advisor's account paperwork and/or agreements. Our review process and analysis of sub-advisers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to the use of SMAs are outlined in Item 5 of this brochure under "Other Types of Fees and Expenses".

Model Portfolios: As part of our portfolio management services, we may invest your assets according to one or more model portfolios developed by our firm ("Model Portfolios"). These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment strategy to a more conservative investment approach. Clients whose assets are invested in model portfolios may not be able to set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the model. Investment selection, individual security performance, and overall market dynamics and economic cycles may drive unforeseeable shifts in the performance of any model portfolio which may result in loss of principal.

As part of this service, we also provide comprehensive financial planning at no additional fee. Financial planning is described in more detail below. Fees for Wealth Management Services are outlined in Item 5 of this brochure.

Standalone Financial Planning

This service is available for clients who do not require investment management, in limited circumstances. 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 engaging Toft for these services will receive written planning deliverables addressing the areas covered by the engagement and 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 Toft will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **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 on a Project-Based and/or via an Ongoing engagement.

Ongoing Financial Planning. This service involves working one-on-one with a financial planner ("planner") over an extended period of time. Through this ongoing arrangement, Clients are expected to collaborate with the planner to develop and assist in the implementation of their financial plan (the "plan"). The planner will monitor the plan, recommend any appropriate changes and ensure the plan is up-to-date as the Client's situation, goals, and objectives evolve.

Upon engaging the firm for financial planning, Toft 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 meet their financial goals; developing & presenting financial planning recommendations based on the aforementioned actions while including all information that was required to be considered in preparing the recommendations; and ongoing monitoring of the Client's progress toward the goals and objectives that the recommendations are based around. These components all require in-depth communication with the Client in order for the planner to establish a financial plan and implementation strategy that provides the Client with the most appropriate options in pursuing their established goals and objectives.

Project-Based Financial Planning. We provide project-based financial planning services on a limited scope one-time engagement. Project-Based Financial Planning is available for Clients looking to address specific questions or issues. The Client may choose from one or more of the above topics to cover or other areas as requested and agreed to by Toft. For Project-Based Financial Planning, the Client will be ultimately responsible for the implementation of the financial plan.

Pro Bono Financial Planning. Toft makes a limited number of Project-Based Financial Planning engagements available at no cost to households that would not otherwise have access to financial advice. Pro Bono Financial Planning is provided on the project basis described above, with a scope and a completion point agreed in advance, and is not offered as an ongoing engagement. Availability is limited and is determined at Toft's discretion based on the Firm's capacity and the circumstances of the household. Clients receiving Pro Bono Financial Planning are advisory Clients of the Firm and are owed the same duty of care and loyalty as all other Clients.

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 Toft in writing. Toft will notify Clients if they are unable to accommodate any requests.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets Under Management

As of September 18, 2026 Toft 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 or solicit prepayment of more than $500 in fees per Client, 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; 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.

Wealth Management Services

The fee for Wealth Management Services is based on a percentage of assets under management and includes investment management services and ongoing financial planning services, as described in this brochure. The annualized fees for Wealth Management Services are based on the following fee schedule:

Assets Under Management	Annual Advisory Fee
$0 – $1,000,000	1.00%
Over $1,000,000 – $5,000,000	0.75%
Over $5,000,000 – $10,000,000	0.55%
Over $10,000,000 – $25,000,000	0.40%
Over $25,000,000	0.30%

Toft has established a minimum annual advisory fee of $3,000 for ongoing Wealth Management Services. The minimum annual advisory fee reflects the minimum level of professional services required to establish and maintain an ongoing wealth management relationship, including investment management, ongoing financial planning, periodic meetings, monitoring, and other advisory services provided throughout the engagement.

Depending on the scope and complexity of the engagement, the minimum annual advisory fee may be increased to an amount not to exceed $10,000. Any increase above the $3,000 minimum will be determined based on objective factors, including the scope of services to be provided, the complexity of the Client's financial circumstances, the anticipated time and resources required, the frequency of ongoing meetings and reviews, and whether the Client requires a greater level of ongoing financial planning and advisory services than is typically provided under the Firm's minimum annual Wealth Management engagement. The applicable annual advisory fee will be agreed upon with the Client prior to the commencement of services and documented in the Client Agreement.

The annual advisory fee is paid monthly in arrears based on the last day of the billing period of the Client's account(s). The advisory fee is calculated using marginal tiers: each rate applies only to the portion of assets under management within that tier. For example, for assets under management of $2,000,000, a Client would pay 1.00% on the first $1,000,000 and 0.75% on the remaining balance. The formula for the monthly fee is determined by the following calculation: (($1,000,000 x 1.00%) + ($1,000,000 x 0.75%)) ÷ 12 = $1,458.33.

In determining the advisory fee, we may allow accounts of members of the same household to be aggregated. Toft 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. Adjustments will be made for deposits and withdrawals during the billing period.

If Toft utilizes an Outside Manager, the above fee schedule does not include the Outside Manager's fee. The Outside Manager's advisory fees, billing schedule, and payment procedures are set forth in their separate written disclosure documents, advisory agreements, and/or the account opening documents of your account Custodian.

Ongoing Financial Planning

We charge an annual fee of $3,000 to $40,000 for Ongoing Financial Planning. Fees are paid monthly in arrears. 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. Ongoing Financial Planning does not include investment management services.

Project-Based Financial Planning

We charge a fixed fee for Project-Based Financial Planning Services. Fixed fee rates range from $3,000 to $12,000. 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. Toft collects a portion of the fee in advance with the remainder due upon completion of the services.

Pro Bono Financial Planning

Toft charges no fee for Pro Bono Financial Planning, which is offered on a project basis only, at Toft's discretion and subject to availability. Clients receiving Pro Bono Financial Planning are under no obligation to engage Toft for any other service.

Fee Payment

For Wealth 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 full banking or credit card credentials. The Client will be provided with their own secure portal in order to make payments.

For Financial Planning Services, 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 full banking credentials. 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).

Clients may incur fees from third-party professionals such as accountants and attorneys that Toft may recommend, upon Client request. Such fees are separate and distinct from Toft's advisory fees.

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.

Terminations and Refunds

For Wealth Management Services, the Advisory Contract may be terminated with written notice 15 calendar days in advance. Since fees are paid in arrears, no refund will be needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination.

For Ongoing Financial Planning services, the Advisory Contract may be terminated with written notice 15 calendar days in advance. Since fees are paid in arrears, no refund will be

needed upon termination of the Advisory Contract. Clients will be responsible for payment of fees up to the date of termination.

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.

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 and high net-worth individuals.

We do not have a minimum account size requirement to open or maintain an account. Clients engaging Toft Wealth, LLC for Wealth Management Services are subject to a minimum annual advisory fee of $3,000, which may be increased to an amount not to exceed $10,000 depending on the scope and complexity of the engagement, as described in Item 5.

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

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.

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.

Use of Separately Managed Accounts (SMAs)

We may utilize certain SMA programs offered by various sub-advisors to manage a portion of a client's portfolio. When we determine it would be more appropriate to use an SMA program over mutual funds or ETFs for a portion of the client's portfolio we will choose from various sub-advisors based on the available SMA programs that meet the needs and objectives established for the management of a client's portfolio. We will review and monitor the sub-adviser's holdings, strategies, concentrations, and leverage as part of our overall periodic risk

assessment. Additionally, as part of our due diligence process, we survey the sub-adviser's compliance and business enterprise risks. Through management of the SMA program the sub-advisor is responsible for the security selection(s) that make up a specific SMA with a given strategy. We do not control the individual security selection but do maintain the ability to increase, decrease, or remove the client's allocation to any SMA that we use. While we perform extensive research on the sub-advisors and specific SMAs that we use, we may be unable to predict changes to the sub-advisors strategy for security selection and overall management style of the SMA. Moreover, as we do not control the sub-adviser's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Quantitative Analysis

We use a quantitative investment approach that relies on analysis of market data, statistical methods, and long-term capital market principles. This analysis may include review of asset class risk and return characteristics, diversification, market pricing, valuation metrics, profitability, company size, fixed income term and credit characteristics, fund expenses, tax efficiency, trading costs, and other factors that may affect expected risk and return.

Our use of quantitative analysis does not generally involve proprietary stock-selection models developed by us. Rather, we may rely on research, portfolio analytics, model allocations, mutual funds, ETFs, separately managed accounts, and other investment solutions developed or managed by third-party investment managers, including managers that use systematic or factor-based investment processes. We evaluate whether those approaches are appropriate for a client's objectives, risk tolerance, time horizon, tax circumstances, liquidity needs, and overall financial plan.

A risk of quantitative analysis is that historical relationships, market data, or statistical patterns may not persist in the future or may not appear over a client's investment time horizon. Strategies designed to emphasize certain factors, asset classes, or sources of expected return may underperform the broader market or other investment approaches for extended periods. Quantitative data may also be incomplete, inaccurate, or misinterpreted. No investment method, model, or research process can eliminate the risk of loss.

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.

In contrast, active management 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.

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.

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.

Factor-Based Portfolio Construction

We may construct portions of Clients' portfolios using a factor-based investment approach. Factor-based portfolio construction involves emphasizing certain characteristics of securities or asset classes that academic research and historical market data have associated with differences in expected risk and return over time. These characteristics may include, but are not limited to, company size, relative price or value, profitability, investment characteristics, fixed income term, credit quality, and other systematic sources of expected return.

We may implement factor-based portfolio construction through mutual funds, ETFs, separately managed accounts, model portfolios, or other investment strategies managed by unaffiliated third-party investment managers or sub-advisers. In these cases, we generally do not select each underlying security directly. Rather, we evaluate the investment strategy, determine whether it is appropriate for the Client's objectives and risk tolerance, and monitor the allocation as part of the Client's overall portfolio.

A risk of factor-based portfolio construction is that the factors emphasized may underperform the broader market or other investment strategies for extended periods of time. Historical relationships between certain factors and expected returns may not persist in the future. Factor-based strategies may also result in periods of higher volatility, tracking differences from broad market indexes, sector or security concentration, tax consequences, or other risks. There is no guarantee that factor-based portfolio construction will improve performance or reduce risk,

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.

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.

Risks Associated with Securities

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

Cash and cash equivalents carry several risks despite being low-risk assets. Holding cash exposes investors to purchasing power risk due to inflation, where the value of cash decreases over time. Cash equivalents are also sensitive to interest rate changes, which can affect their value. Additionally, there is a slight credit risk associated with the issuers of cash equivalent instruments. Liquidity risk may arise from restrictions on accessing certain cash equivalents, while reinvestment risk pertains to the possibility of lower rates upon reinvestment. Lastly, holding excessive cash can result in missed investment opportunities, representing an opportunity cost in terms of potential higher returns from other asset classes. Investors typically manage these risks by strategically allocating cash within diversified portfolios.

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.

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

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

Toft 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 Toft nor 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 Toft nor 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 Toft nor its management persons have any relationship or arrangement with any outside financial industry related parties.

Recommendations or Selections of Other Investment Advisers

Toft recommends Clients to Outside Managers to manage their accounts. In the event that we recommend an Outside Manager, we do not share in their advisory fee. Our fee is separate and in addition to their compensation (as noted in Item 5 of this brochure). 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, Toft 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 adheres to the Code of Ethics and Standards of Conduct adopted by the CFP® Board of Standards Inc., and 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 Toft's Chief Compliance Officer in advance of the transaction in an account. Toft 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 nor 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 requires Clients to establish brokerage accounts with Charles Schwab & Co., Inc. ("Schwab"), 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, Schwab may provide us with certain services that may benefit us.

Toft offers investment advisory services through the custodial platform offered by Charles Schwab & Co., Inc., an unaffiliated SEC-registered broker-dealer and FINRA/SIPC member ("Schwab"). Custody, clearing, and execution services are provided by Schwab as a self-clearing broker-dealer. Toft's clients establish brokerage accounts through Schwab. Toft

maintains an institutional relationship with Schwab whereby Schwab provides certain benefits to Toft, including a fully digital account opening process, a variety of available investments, and integration with software tools that can benefit Toft and its clients. Toft is not affiliated with Schwab.

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our Clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our Clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. The benefits received by Advisor or its personnel do not depend on the number of brokerage transactions directed to Schwab. As part of its fiduciary duties to Clients, Advisor at all times must put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Schwab for custody and brokerage services. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate. Following is a more detailed description of Schwab's support services:

1. **Services that benefit you.** Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our Clients. Schwab's services described in this paragraph generally benefit you and your account.
2. **Services that may not directly benefit you.** Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our Clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our Clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:
    - provide access to Client account data (such as duplicate trade confirmations and account statements)
    - facilitate trade execution and allocate aggregated trade orders for multiple Client accounts
    - provide pricing and other market data
    - facilitate payment of our fees from our Clients' accounts
    - assist with back-office functions, recordkeeping, and Client reporting

3. **Services that generally benefit only us.** Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:
   - Educational conferences and events
   - Consulting on technology, compliance, legal, and business needs
   - Publications and conferences on practice management and business succession
4. **Your brokerage and custody costs.** For our Clients' accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees.

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 requires Clients establish account(s) at Schwab to execute transactions through. We will assist with establishing your account(s) at Schwab, 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 requiring that Clients use Schwab, 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.

We do not permit Clients to direct brokerage (i.e., direct us to use a broker-dealer of the Client's choosing).

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 Toft 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

Clark Purdy, Founder, CEO and CCO of Toft, 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. Toft does not provide specific reports to Clients, other than written financial planning deliverables provided as part of the engagement.

Clients who engage us for investment management services will have their account(s) reviewed regularly on a quarterly basis by Clark Purdy, Founder, CEO and CCO. 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.

Toft 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 Toft Wealth, LLC

Toft is a fee-only firm that is compensated solely by its Clients. Toft does not receive commissions or other sales-related compensation. Except as mentioned in Item 12 above, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

Client Referrals from Solicitors

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

Item 15: Custody

Toft does not hold, directly or indirectly, Client funds or securities, or have any authority to obtain possession of them. All Client assets are held at a qualified custodian.

If Toft deducts its advisory fee from Client's account(s), the following safeguards will be applied:

1. The Client will provide written authorization to Toft, permitting us to be paid directly from Client's accounts held by the custodian.
2. The custodian will send at least quarterly statements to the Client showing all disbursements from the accounts, including the amount of the advisory fee.

In jurisdictions where required, Toft will send an itemized invoice to the Client at the same time it instructs the custodian to debit the advisory fee. Itemization includes the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

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.

Item 16: Investment Discretion

For those Client accounts where we provide Wealth Management Services, Toft 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 Toft has engaged an Outside Manager to assist with the management of Client's portfolio, Toft 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.

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 $500 in fees six months or more in advance.

Item 19: Requirements for State-Registered Advisers

Principal Officers

Clark Purdy serves as Toft's sole principal and CCO. Mr. Purdy is a Certified Financial Planner (CFP®) and a Chartered Financial Consultant (ChFC®). Mr. Purdy earned a Bachelor of Science in Finance from Illinois State University in 2021. His business experience includes: Founder & CEO and CCO of Toft Wealth, LLC (06/2026–Present); Financial Advisor at McBeath Financial Group (11/2024–06/2026); Advanced Markets Administrator at COUNTRY Trust Bank (07/2024–10/2024); Internal Wholesaler at COUNTRY Capital Management Company (06/2023–07/2024); Internal Wholesaler at COUNTRY Trust Bank (06/2023–07/2024); and Registered Client Associate at Wells Fargo Clearing Services, LLC (06/2021–06/2023).

Outside Business

Clark Purdy is not involved in any investment-related outside business activities or other businesses that take 10% of their time or income.

Performance-Based Fees

Neither Toft nor Clark Purdy is compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Toft 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 Toft nor Clark Purdy has any relationship or arrangement with issuers of securities.

Item 1: Cover Page

Toft

Toft Wealth, LLC
718 Osage St
Normal, IL 61761

Additional Location:
216 E Grove St, Suite 1902
Bloomington, IL 61701

(309) 718-8884
https://toftwealth.com

Form ADV Part 2B – Brochure Supplement

Dated: September 18, 2026

For

Clark Purdy
Founder & CEO and Chief Compliance Officer

This brochure supplement provides information about Clark Purdy that supplements the Toft Wealth, LLC ("Toft") brochure. You should have received a copy of that brochure. Please contact Clark Purdy if you did not receive Toft's brochure or if you have any questions about the contents of this supplement.

Additional information about Clark Purdy is available on the SEC's website at www.adviserinfo.sec.gov which can be found using the identification number 7409853.

Item 2: Educational Background and Business Experience

Clark Purdy

Born: 1999

Educational Background

- 2021 - Bachelor of Science in Finance, Illinois State University

Business Experience

- 06/2026 – Present, Toft Wealth, LLC, Founder & CEO and CCO
- 11/2024 - 06/2026, McBeath Financial Group, Investment Advisor Representative
- 07/2024 - 10/2024, COUNTRY Trust Bank, Advanced Markets Administrator
- 06/2023 - 07/2024, COUNTRY Capital Management Company, Internal Wholesaler
- 06/2023 - 07/2024, COUNTRY Trust Bank, Internal Wholesaler
- 06/2023 - 07/2024, COUNTRY Insurance Affiliates, Internal Wholesaler
- 06/2021 - 06/2023, Wells Fargo Clearing Services, LLC, Registered Client Associate

Professional Designation(s)

CFP® (Certified Financial Planner): Clark Purdy is certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, Clark Purdy may refer to themself as a CERTIFIED FINANCIAL PLANNER® professional or a CFP® professional, and Clark Purdy may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials.

- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board's Code of Ethics and Standards of Conduct ("Code and Standards"), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board's Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ChFC® (Chartered Financial Consultant): This designation is issued by The American College and is granted to individuals who have at least three years of full-time business experience within the five years preceding the awarding of the designation. The candidate is required to complete eight courses covering financial planning, insurance, income taxation, retirement, investments, estate planning, comprehensive case analysis, and contemporary applications in financial planning. Each course has a final proctored exam and, once the designation is issued, the individual is required to complete 30 hours of continuing education every two years, including one hour of ethics.

Item 3: Disciplinary Information

Clark Purdy 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

Clark Purdy is not involved in any investment-related outside business activities or other businesses that take 10% of their time or income.

Item 5: Additional Compensation

Clark Purdy does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Toft.

Item 6: Supervision

Clark Purdy, as Chief Compliance Officer of Toft, supervises the advisory activities of our firm. Clark Purdy is bound by and will adhere to the firm's policies and procedures and Code of Ethics. Clients may contact Clark Purdy at the phone number on this brochure supplement. Mr. Purdy may be reached at (309) 718-8884.

Item 7: Requirements for State Registered Advisers

Clark Purdy has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.