

Item 1: Cover Page

Innovate Wealth LLC

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Form ADV Part 2A – Firm Brochure

Dated February 1st, 2020

This Brochure provides information about the qualifications and business practices of Innovate Wealth LLC, “IW”. If you have any questions about the contents of this Brochure, please contact us at (704)232-7410. 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.

Innovate Wealth LLC is registered as an Investment Adviser with the States of North Carolina, Texas, and Pennsylvania. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about IW is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 283332.

Please note, unless a client has received the firm’s disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without penalty.

Item 2: Material Changes

Since our last annual update of February 1, 2019, we have made the following material changes:

- The fee for Hourly Planning is \$225 per hour, require a \$450 minimum deposit before beginning services.
- The annual fee for Financial Planning is \$2,800 for a 12-month engagement (\$1000 paid upfront and \$600 on a quarterly basis). With prior approval by IW, clients may also pay \$250 per month (\$3,000).
- The minimum fee for Investment Management increased to \$2,800
- As of December 31, 2019, IW managed client assets totaling \$24.9 million on a discretionary basis.

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Item 4: Advisory Business

a. Description of Advisory Firm

Innovate Wealth LLC is registered as an Investment Adviser in the States of North Carolina, Texas, and Pennsylvania. IW was founded February 8th, 2016. Steven J. Sivak is the principal owner of IW.

b. Types of Advisory Services

Investment Management Services (IW Manages Accounts)

We are in the business of managing individually tailored investment portfolios. 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 target. During our data-gathering process, we determine the

client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may 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 as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Comprehensive Financial Planning

We provide financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning is a comprehensive 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 or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the 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 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, and providing education on the different asset classes and general market dynamics.
- **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 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.

c. Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, client financial plans and their implementation are dependent upon the client's individual needs, financial situation, risk tolerance, and specific requests. Clients may impose restrictions on investments.

d. Wrap Fee Program

IW offers a Wrap Fee program to our investment management clients. Under a Wrap Fee program, clients receive investment management alongside comprehensive financial planning as detailed above. The portfolios will vary according to individual client circumstances and fees are negotiable. IW does not hire outside portfolio managers and therefore no portion of the fee charged will go to pay outside managers.

By using a Wrap Fee program, the client does not pay additional commissions charged by a custodian on each trade, and the entire fee is received by IW (see Item 5). The clients may pay more or less using a Wrap Fee program versus paying for commissions on each trade, depending on the investments used and frequency of trading. Clients who trade a portfolio infrequently or rarely are likely to pay more with a Wrap Fee program.

e. Assets Under Management

As of December 31st, 2019, IW manages \$24.9MM, all of which is managed on a discretionary basis

Item 5: Fees and Compensation

a. Compensation

IW is compensated in three ways: through an hourly rate, through a fixed fee annual agreement, or by charging a percentage of Assets under Management. Fees are always negotiable. IW is not compensated in any other way and receives no additional income than as follows:

Hourly Planning: \$225 hourly, billed as needed. IW requires two hours minimum engagement with a \$450 deposit.

Financial Planning: \$2800 for an annual (12-month) engagement (\$1000 upfront, \$600 at each quarter). Clients can also choose to pay for a 12-month agreement as \$250/month (\$3000) if requested by the client.

Wrap Fee according to the schedule below:

Household Value	Annual Advisory Fee (min. \$2800)
\$0 - \$1,000,000	0.90%
\$1,000,001 - \$3,000,000	0.40%
\$3,000,001 and above	0.10%

Wrap Fee will be discounted after 3 years (from the time of first invoice) with IW to:

Household Value	Annual Advisory Fee (min. \$2800)
\$0 - \$1,000,000	0.80%
\$1,000,001 - \$3,000,000	0.30%
\$3,000,001 and above	0.10%

- b. IW will bill clients directly for all fees. Financial planning clients will pay through check, electronic transfer, or credit cards, while IW will deduct wrap fees directly from client accounts. Clients can opt to pay wrap fees in other ways if desired. IW will bill wrap fees quarterly in advance and financial planning fees according to the timeline listed above.
- c. The client may be subject to additional expenses. 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 are exclusive of and in addition to our fee, and we shall not receive any portion of these costs.

- d. Clients will pay fees in advance for services (except certain hourly arrangements). Clients will be able to obtain a refund at any point if they are dissatisfied by notifying IW in writing of their wishes to terminate the contract. Fees will be refunded pro rata from the date of notification.
- e. IW receives no additional compensation from the sale of securities or other investment products.

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

We do not have performance-based fees or side-by-side management.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, businesses, and high net-worth individuals.

We do not have a minimum account size requirement, but the minimum wrap fee is \$2800/year, consistent with Assets under Management of ~\$311,000. Clients that do not meet the asset minimum will be billed \$700/quarter until the first quarterly billing when assets exceed that amount.

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

a-b. Methods of Analysis and Risks:

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 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.

c. Types of Securities and Risks

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: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. 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.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

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.

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 such factors 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.

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.

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.

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.

Investment Companies Risk. 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). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed 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 client's invest.

Item 9: Disciplinary Information

Neither IW nor its agents are or have been subject to any legal or disciplinary actions.

Item 10: Other Financial Industry Activities and Affiliations

- a. No IW employee is registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- b. No IW employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.
- c. IW does not have any relationship with any parties that would cause a conflict of interest.
- d. IW only receives compensation directly from clients. We do not receive compensation from any outside source.

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

As a fiduciary, our firm and its associates have 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 Professional Responsibility 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.

a. Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated 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 - Associated 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 - Associated 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 - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated 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 of copy of its Code of Ethics to any client or prospective client upon request.

b. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates 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, etc.

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

IW and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. Buying and/or selling the same securities as our clients can create a **potential conflict of interest**. For example, buying a security ahead of a client (aka frontrunning) could result in a better price than

the client receives.

As fiduciaries, we have a duty to disclose and mitigate this risk as best as possible. In the event a related person wishes to purchase a security at the same time as a client, this will be done through block trading, so that the client is assured the same price. Additionally, we believe we should ‘eat our own cooking,’ so we invest in the same investment models/securities as we recommend to our clients. If a related person ever wants to take the opposite side of a trade from a client, IW will restrict any trade on the same day as a client. At no time will any related person transact in any security that would be to the detriment of the client.

IW will utilize commission-free securities provided by the custodian when possible. Different products have different commission schedules. This can present a conflict of interest with the client, as we are choosing investments because they are cheaper for IW. We mitigate this by ensuring whatever investment is chosen is done so first on its investment merit. We accept that we will incur occasional commissions as a normal course of business if they make investing sense for the client.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker-Dealers

Innovate Wealth LLC does not have any affiliation with Broker-Dealers. IW will recommend Investment Management clients use TD Ameritrade as their custodian. We recommend a custodian based on their reputation and services provided. As circumstances change, we will periodically review the custodians to ensure we still feel TD Ameritrade offers the best situation for our clients.

a. Research and Other Soft-Dollar Benefits

IW currently receives soft-dollar benefits from TD Ameritrade in the form of technology and research. TD Ameritrade receives income through brokerage commissions (client trading) and in turn provides IW with access to technology and research that IW would otherwise have to purchase on the open market.

TD Ameritrade does not provide proprietary research, but does provide access to research of third-parties, like S&P, TheStreet, Morningstar, etc.

b. IW Incentives

IW may have an incentive to choose a custodian based on soft-dollar benefits like those listed above. This may be a **conflict of interest** in achieving the cheapest execution available to a client.

c. Custodian commissions

Clients may pay a higher commission through TD Ameritrade than they would at other custodians. IW weighs the total offering available to a client including research and technology, not just the cheapest provider.

- d. Soft dollar benefits such as technology and research are available equally to all clients, regardless of their account size.
- e. IW does not receive any commissions generated from client trades.
- f. IW encourages clients to use TD Ameritrade as their trading platform because of the overall benefits vs. competitors. We make this clear to clients before they sign any agreement.

2. Brokerage for Client Referrals

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

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend TD Ameritrade for clients, however, clients may custody their assets at a custodian of their

choice. Not all advisors will recommend a specific brokerage. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients' money over using a lower-cost custodian. We direct clients to TD Ameritrade because we feel it offers them the best situation to working with our firm, though it is not a requirement to become a client. Clients also may not be able to seamlessly integrate their chosen technology with our platform, causing inefficiencies for IW and the client. Finally, on a different custodian trading platform, we would not be able to provide execution through block trading as explained below.

Custodians are likely to pay very little interest on money markets (cash). This 'net interest income' is a primary source of income for their business. This can be a **potential conflict of interest** as they could get a higher interest rate elsewhere. We mitigate this risk by holding as little cash as possible at all times and using alternatives (short-term treasuries) to earn better interest.

Some IW clients choose us for investment management, some do not, and that choice is entirely theirs after we present them with the options.

B. Aggregating (Block) Trading for Multiple Client Accounts

For accounts managed by IW, we may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). IW will do this any time possible when the change (percentage) in a security or addition or deletion of a security is likely to occur across many client accounts. For example, when changing securities at the model level, multiple clients can be impacted and we will attempt to aggregate those orders to achieve equal pricing. 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 proportional to the size of the account, but it is not based on account performance or the amount or structure of management fees.

Item 13: Review of Accounts

- A. Client accounts with the Investment Management Service will be reviewed regularly and at least on an annual basis by Steven J. Sivak, Managing Partner and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels.
- B. 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.
- C. Clients will receive trade confirmations from the broker(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.

IW will not provide written reports to Investment Management clients but utilizes third-party software that can be accessed at any time to see a real-time investment or financial planning report. We use third-party vendor software for performance calculation and reporting. Calculations are based on the investor centric Internal Rate of Return (IRR) or dollar-weighted methodology which is standard industry format. Calculations can be replicated using the 'XIRR' function in common spreadsheet programs. Potential reports clients may receive include, but are not limited to, asset allocation, income, and tax or capital gains.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

IW does not accept custody of client funds. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client investment assets. We urge clients to carefully review such statements and compare such official custodial records to the reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For client accounts in which IW directly debits their advisory fee:

1. Clients will provide written authorization to IW to deduct advisory fees from an account held by a custodian.
2. IW will send custodian written notice of the amount of the fee to be deducted from the client account.
3. IW will send clients a written invoice itemizing the fee, including any formulae used to calculate the fee, the time period covered by the fee, and the amount of assets on which the fee was based.

Clients may authorize IW to send money to their bank accounts or other account in the client's name on a recurring or periodic basis. IW will never disburse money to a third-party without client direction and express written consent.

Item 16: Investment Discretion

For those client accounts where we provide investment management services, we may maintain discretion over client trading (this allows IW to make buy/sell decisions, including time and amount). Investment discretion is explained to clients in detail when an advisory relationship has commenced. If the client selects investment discretion 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. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may place limitations on our discretionary authority, for example a client may request that one certain security be kept but all others can be bought/sold. If a client does not want IW to have discretionary authority, IW will encourage them to become a financial planning client only, without investment management.

Item 17: Voting Client Securities

We do not vote Client proxies. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, the client will receive proxy materials directly from the account custodian. However, in the event IW receives any written or electronic proxy materials, IW will forward them directly to the client by mail or email.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

IW maintains a minimum net worth of \$10,000 and \$1MM of Errors and Omissions insurance.

We do not have custody of client funds or securities or require or solicit prepayment of more than \$500 in fees per client six months in advance of service.

Item 19: Requirements for State-Registered Advisers

Steven J. Sivak

Born: 1979

Educational Background

- 2001 – Civil Engineering, Lafayette College

Business Experience

- 03/2016 – Present, Innovate Wealth LLC, Managing Partner and CCO
- 02/2008 – 03/2016, Morgan Stanley, Financial Advisor
- 10/2006 – 02/2008, UBS Financial Services, Financial Advisor

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: CFP® certificants must have a minimum of three years' workplace experience in financial planning and develop their theoretical and practical financial planning knowledge by completing a course of study approved by CFP® Board. They must pass a comprehensive 2-day, 10-hour CFP® Certification Examination that tests their ability to apply financial planning knowledge in an integrated format. As a final step to certification, CFP® practitioners agree to abide by a strict code of professional conduct.

Other Business Activities

Steven J. Sivak receives rental income from short (Airbnb) and long-term property rentals

Performance Based Fees

IW is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Innovate Wealth LLC 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

Innovate Wealth LLC, nor Steven J. Sivak, have any relationship or arrangement with issuers of securities.

Additional Compensation

Steven J. Sivak does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through IW.

Supervision

Steven J. Sivak, as Managing Partner and Chief Compliance Officer of IW, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

Steven J. Sivak has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding,

administrative proceeding, or a bankruptcy petition.