



## **C2 Private Wealth Firm Brochure**

(Part 2A of Form ADV)

### **Main Office**

**29409 Haggerty Road  
Suite 200  
Novi, MI 48377  
PHONE: 866-211-1904  
PHONE: 248-567-6688  
FAX: 248-327-0845**

### **Branch Office**

**1310 S. Main Street, Suite 15  
Ann Arbor, MI 48104**

### **Branch Office**

**36800 Woodward Ave, Suite 101  
Bloomfield Hills, MI 48304**

### **Branch Office**

**3622 Endeavor Avenue  
Columbia, MO 65201**

**EMAIL: [kcassidy@c2privatewealth.com](mailto:kcassidy@c2privatewealth.com)**

**WEBSITE: [www.c2privatewealth.com](http://www.c2privatewealth.com)**

This brochure provides information about the qualifications and business practices of Strategic Investment Advisors, LLC dba C2 Private Wealth. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 248-567-6688 or 866-211-1904. 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.

Additional information about Strategic Investment Advisors, LLC dba C2 Private Wealth. (Firm CRD# 151501) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 3, 2025

## **Item 2: Material Changes**

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

---

### **Material Changes since the Last Update**

This update is in accordance with the annual filing requirements for investment advisors. Since the last update on October 8, 2024, the following changes have occurred:

- The cover page has been updated with our new address and website.
  - Item 4 has been updated to disclose the most recent calculation for client assets under management.
  - We are now doing business as C2 Private Wealth.
- 

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at 248-567-6688 or 866-211-1904.

# Item 3: Table of Contents

## Form ADV – Part 2A – Firm Brochure

### Item 1: Cover Page



PRIVATE WEALTH .....	i
<b>C2 Private Wealth Firm Brochure .....</b>	<b>i</b>
<b>Item 2: Material Changes .....</b>	<b>ii</b>
Annual Update.....	ii
Material Changes since the Last Update .....	ii
Full Brochure Available .....	ii
<b>Item 3: Table of Contents.....</b>	<b>iii</b>
<b>Item 4: Advisory Business .....</b>	<b>1</b>
Firm Description .....	1
Types of Advisory Services .....	1
Client Tailored Services and Client Imposed Restrictions.....	4
Wrap Fee Programs .....	4
Client Assets Under Management.....	4
<b>Item 5: Fees and Compensation .....</b>	<b>4</b>
Method of Compensation and Fee Schedule.....	4
Client Payment of Fees.....	6
Additional Client Fees Charged .....	6
Prepayment of Client Fees.....	6
External Compensation for the Sale of Securities to Clients.....	6
<b>Item 6: Performance-Based Fees .....</b>	<b>6</b>
Sharing of Capital Gains.....	6
<b>Item 7: Types of Clients.....</b>	<b>6</b>
Description .....	6
Account Minimums .....	6

<b>Item 8: Methods of Analysis, Investment Strategies and Risk of Loss</b> .....	<b>7</b>
Methods of Analysis .....	7
Investment Strategy.....	7
Security Specific Material Risks .....	7
<b>Item 9: Disciplinary Information</b> .....	<b>8</b>
Criminal or Civil Actions .....	8
Administrative Enforcement Proceedings.....	8
Self-Regulatory Organization Enforcement Proceedings.....	8
<b>Item 10: Other Financial Industry Activities and Affiliations</b> .....	<b>8</b>
Broker-Dealer or Representative Registration.....	8
Futures or Commodity Registration.....	8
Material Relationships Maintained by this Advisory Business and Conflicts of Interest..	8
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest	9
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading</b> .....	<b>9</b>
Code of Ethics Description .....	9
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest.....	9
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest.....	10
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest.....	10
<b>Item 12: Brokerage Practices</b> .....	<b>10</b>
Factors Used to Select Broker-Dealers for Client Transactions.....	10
Aggregating Securities Transactions for Client Accounts .....	11
<b>Item 13: Review of Accounts</b> .....	<b>11</b>
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved.....	11
Review of Client Accounts on Non-Periodic Basis .....	11
Content of Client Provided Reports and Frequency.....	11
<b>Item 14: Client Referrals and Other Compensation</b> .....	<b>11</b>
Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest.....	11
Advisory Firm Payments for Client Referrals.....	11

<b>Item 15: Custody</b> .....	<b>12</b>
Account Statements .....	12
<b>Item 16: Investment Discretion</b> .....	<b>12</b>
Discretionary Authority for Trading .....	12
<b>Item 17: Voting Client Securities</b> .....	<b>12</b>
Proxy Votes .....	12
<b>Item 18: Financial Information</b> .....	<b>12</b>
Balance Sheet.....	12
Financial Conditions Reasonably Likely to Impair Advisory Firm’s Ability to Meet Commitments to Clients.....	12
Bankruptcy Petitions during the Past Ten Years.....	12
<b>Supervised Person Brochure</b> .....	<b>13</b>
<b>Part 2B of Form ADV</b> .....	<b>13</b>
Kirk Cassidy.....	13
<b>Brochure Supplement (Part 2B of Form ADV)</b> .....	<b>14</b>
Principal Executive Officers and Management Persons .....	14
Kirk Cassidy.....	14
Educational Background and Business Experience .....	14
Disciplinary Information.....	14
Other Business Activities .....	14
Performance Based Fee Description .....	15
Supervision.....	15
<b>Supervised Person Brochure</b> .....	<b>16</b>
<b>Part 2B of Form ADV</b> .....	<b>16</b>
Heather Lyon .....	16
<b>Brochure Supplement (Part 2B of Form ADV)</b> .....	<b>17</b>
Principal Executive Officers and Management Persons .....	17
Heather Lyon .....	17
Educational Background and Business Experience .....	17
Disciplinary Information.....	17
Other Business Activities .....	17
Performance Based Fee Description .....	17

Supervision.....17

## Item 4: Advisory Business

---

### **Firm Description**

Strategic Investment Advisors, LLC., dba C2 Private Wealth (“C2PW”) was founded in 2007. Cassidy and Associates Inc. is the primary owner. Heather Lyon is the Chief Compliance Officer.

C2PW is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The firm’s managing member is affiliated with entities that sell insurance products.

C2PW does not act as a custodian of client assets. The client always maintains asset control.

An evaluation of each client's initial situation is provided to the client, often in the form of a net worth statement or risk analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Under CCR Section 260.238(k), C2PW, its representatives, or any of its employees will disclose to the clients all material conflicts of interest.

---

### **Types of Advisory Services**

C2PW provides investment supervisory services, also known as asset management services and furnishes financial planning and investment advice through consultations.

#### ASSET MANAGEMENT

C2PW offers discretionary direct asset management services to advisory clients. C2PW will offer clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The client will authorize C2PW discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

C2PW also offers discretionary asset management services to individuals on their qualified plan assets when C2PW has access to an advisor login providing access to manage the assets in the client account based on the investment options available in the plan. The client will authorize C2PW discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Additionally, C2PW offers discretionary asset management services to clients by selecting the AssetMark Platform. For more information regarding the AssetMark Platform, refer to AssetMark Platform Disclosure Brochure.

The minimum investment required on the AssetMark Platform depends upon the Investment Solution chosen for a Client’s account and is generally \$25,000-\$50,000 for Mutual Fund and \$25,000 for ETF Accounts, and from \$50,000 to \$500,000 for Privately Managed and Unified Managed Accounts, depending on the investment strategy selected for the account.

These minimums are described in more detail in the AssetMark Platform Disclosure Brochure. Accounts below the stated minimums may be accepted on an individual basis at the discretion of AssetMark.

All asset management clients will also receive comprehensive financial planning services.

As part of the planning process, C2PW will share information with their affiliated CPA firm, Yaske & Associates, PLLC to review plans when certain events are triggered such as retirement, charitable distributions, Roth conversions, etc. There is no additional charge for this. If a client opts out of C2PW sharing information with Yaske & Associates, PLLC and prefers to work with a CPA of their choosing, C2PW will charge a maximum annual fee of \$1,000 for consulting and coordination with their CPA.

In addition, C2PW will share client information with attorneys Marc H. Wander, Esq. and Marc H. Wander PLLC to ensure all estate planning documents are in order. C2PW will not be able to provide services to clients who opt out of this sharing.

### QUALIFIED PLAN CONSULTING OR ADVISORY SERVICES

C2PW offers two different services.

1. Qualified Plan Consulting Services to individuals ("QPA"). C2PW will meet with the client for information gathering initially and will deliver a recommended asset allocation which is in-line with the plan built for the client. Those allocations will be periodically reviewed and if necessary, changes will be recommended. . C2PW expects the client to provide the firm with updates to their employer sponsored plan's investment line-up along with statements (via the eMoney platform when possible) on at least an annual basis. The firm does not have access to the participant's account in the employer sponsored plan and therefore no discretion over the account. It is ultimately the clients' decision to execute the recommendations made by C2PW.
2. Participant Accounts in an Employer Sponsored Plan custodied at Fidelity ("TEM" at Fidelity). C2PW will meet with the client to determine if this service is available to the participant account. If this service is selected, C2PW will review the investment offering in the employer sponsored plan and deliver an asset allocation recommendation. C2PW will have limited access to view and rebalance the participant account on Fidelity's TEM platform. C2PW will review the participant account at least annually and re-balance as necessary to remain aligned with the recommended asset allocation.

### FINANCIAL PLANNING AND CONSULTING

C2PW may work with clients for whom they do not provide discretionary management services. In those cases, the Firm will enter into a Financial Planning or Consulting Agreement with the client and charge a flat or hourly fee for agreed upon services. Services include but are not limited to Basic Investment Evaluation, Retirement Planning, Protection Planning and Estate Planning.. If the client elects to act on any of the recommendations, the client is under no obligation to affect the transaction through C2PW. Financial plans will continue year to year unless terminated by either party providing written notice to the other party.

### FINANCIAL CONSULTING – Succession Planning Academy

C2PW offers two options under this Program:

- I. **Build Your Foundation (Basic Plan):** this plan will include an initial fact-finding meeting and a Plan that will be a road map for you to follow through your asset accumulation years. This Plan is a one-time delivery without additional consulting. This Plan is best for those just starting out on their financial journey. By leveraging the same team your parents use, we are able to help guide you toward the proper account types and consider the impact your parent's Plan may have on your retirement plan. This option will cover:  
Basic Investment Education
  - Establishing a Budget
  - Asset Allocation



- Accumulation Goals
  - Education Planning
- Retirement Planning:
- IRA vs ROTH
  - Beneficiary Designations
  - 401(k)/403(b) Education/Allocation
  - Insurance Options

II. **Retirement Income Readiness (Intermediate Plan):** this plan will include an initial fact-finding meeting, a Plan that will be a road map for you to follow through your asset accumulation and distribution years, access to our affiliated CPA firm and an annual review. We will encourage you to reach out to us about key milestones in your life: home purchase, children’s education savings, new job, and inheritance. We offer advice about asset titling, setting up legal documents such as wills and trusts, benefits of charitable giving, asset protection with life insurance and tax efficient income distributions in retirement. By leveraging the same team your parents use, we are able to help guide you toward the proper account types and consider the impact your parent’s Plan may have on your retirement plan. This option will cover:

Investment Education

- Asset Allocation
- Accumulation Goals
- Education Planning
- 401(k)/403(b) Education/Allocation

Retirement Planning:

- Income and Expenses
- Distribution Planning
- Beneficiary Designations
- IRA vs ROTH

Protection Planning

- Disability Income Insurance
- Long Term Care Insurance
- Asset Protection-Insurance Options

Estate Planning (*other than legal services*)

- Distribution Goals
- Taxation Issues
- Charitable Giving

DISCLOSURE REGARDING ROLLOVER RECOMMENDATIONS

When a client or prospect leaves an employer, they typically have five options regarding their existing retirement plan: (i) leave the money in the former employer’s plan, if permitted; (ii) roll over the assets to the new employer’s plan, if one is available and rollovers are permitted; (iii) rollover to a brokerage (self-directed) Individual Retirement Account (“IRA”); (iv) roll over the assets to an advisory IRA; or (v) cash out the account value (which could, depending upon the client’s age, result in adverse tax consequences). Clients contemplating rolling over retirement funds to an IRA for us to manage are encouraged to first speak with their CPA or tax attorney. There is a financial incentive for your IAR to recommend that you roll over your assets into one or more accounts, because the enrollment will generate compensation based on the increase in your IAR’s total assets under management. We address these financial compensation conflicts by including the disclosure of the conflicts in this brochure and by requiring your IAR to recommend investment advisory programs,

investment securities, and services that are in the best interest of each client based upon the client's investment objectives, risk tolerance, financial situation, and cost. As fiduciaries of the Investment Advisers Act of 1940, we must act in your best interest and not put our interest ahead of yours. At the same time, the way C2PW makes money creates some conflicts with your interests. In addition, the costs of maintaining an IRA account with us generally involve higher costs than keeping the assets in your current Employer Sponsored Plan. While we typically offer a broader range of investment options and services than an employer-sponsored plan, there are no guarantees that the additional investment options will outperform your employer-sponsored plan. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have the assets in an account managed by us.

---

### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written client consent.

---

### **Wrap Fee Programs**

C2PW does not participate in wrap fee programs.

---

### **Client Assets Under Management**

C2PW, has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$1,181,835,232	\$0	December 31, 2024

---

## **Item 5: Fees and Compensation**

---

### **Method of Compensation and Fee Schedule**

#### ASSET MANAGEMENT

C2PW offers discretionary direct asset management services to advisory clients. Fees for these services will be based on a percentage of Assets Under Management and not to exceed 1.00%.

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in advance based on the amount of assets managed as of the close of business on the last business day of each quarter. Quarterly advisory fees deducted from the clients' account by the custodian will be reflected on the brokerage statement. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with thirty (30) days written notice. The client will be entitled to a pro rata refund for the days service was not provided in the final quarter. The client shall be given thirty (30) days prior written notice of any increase in fees.

#### AssetMark Platform

Accounts on the AssetMark Platform are assessed a total Account Fee. This Account Fee includes C2PW's advisory fee. Fees and compensation for using the AssetMark Platform are provided in more detail in the AssetMark Platform Disclosure Brochure. Discretionary Manager Fee schedules are included in the Client Billing Authorization or Appendix A to the Client Service Agreement.

The fees applicable to each Account on the AssetMark Platform may include:

**1) Financial Advisor Fee: maximum annual fee of 1.00%**

**2) Platform Admin/Investment Manager Fee\*: 0.0%-0.50%/year**

\* C2PW may select Investment Managers for your advisory account. Each of the Investment Managers may charge a separate Investment Manager Fee, calculated as a percentage of the total assets managed by the Investment Manager, which is in addition to the overall investment Advisory Fee negotiated between the Client and the Financial Advisory Firm. The fee charged by each Investment Manager is specified on the individual Discretionary Manager Designation incorporated in the AssetMark Client Services Agreement and executed by the Client. Fees will vary from Investment Manager to Investment Manager; a complete list of fee schedules of the Investment Managers participating in the Platform is available from the Financial Advisory Firm by request. This fee will be *included* in the AssetMark Platform Fee above. Other fees for special services may also be charged. The Client should consider all applicable fees.

**QUALIFIED PLAN CONSULTING OR ADVISORY SERVICES**

1. The annual fee for Qualified Plan Consulting Services (“QPA”) will not exceed .50%, annually, of assets. Fees will be paid quarterly in advance. Fees will be deducted from another account managed by C2PW. For termination after five (5) days, client will be entitled to a pro-rata refund based on advice already rendered. The client shall be given prior written notice of any increase in fees, and the client will acknowledge, in writing, any agreement to the increase in said fees.
2. Participant Accounts in an Employer Sponsored Plan (“TEM” at Fidelity)  
The annual fee for the management of a participant’s *qualified plan assets* custodied at Fidelity (“TEM”) will not exceed 0.74%, annually, of assets. If you are participating in this service, the C2PW fees will be debited from the participant’s account held at Fidelity quarterly and in advance. Fees will not exceed an annual fee of 0.74% of the assets being managed based on the account balance at the end of the previous quarter.

**FINANCIAL PLANNING and CONSULTING**

Initial consulting fees are paid 50% upon executing the planning agreement with the remainder due upon delivery of the plan.

**FIXED FEES**

Financial Planning Services are offered based on a negotiable fixed between \$5,000 and \$10,000 based on complexity and unique client needs.

**HOURLY FEES**

Financial Planning Services are offered based on an hourly fee of \$400 per hour.

**FINANCIAL CONSULTING – SUCCESSION PLANNING ACADEMY**

- I. **Build Your Foundation (Basic Plan):** The one-time fee for this Plan is \$1500.00. C2PWs initial financial consulting fees are paid 50% upon completion of this agreement and the remainder when the Plan is delivered.
- II. **Retirement Income Readiness (Intermediate Plan):** The fee for this Plan and related consulting services is \$2000/year with 50% due upon signing the agreement and the remaining paid upon delivery of the Plan. Thereafter, a maximum monthly consulting fee of \$100 will apply for the duration of the Consulting Agreement. Payment for this Plan will be in accordance with The Planning Fees, Billing and Renewals as described in Section 1.a through g, below.

---

### **Client Payment of Fees**

Investment management fees are billed quarterly, in advance, meaning that you are billed before the three-month billing period has started. Fees are usually deducted from a designated client account to facilitate billing. The client must consent in advance to direct debiting of their investment account.

Fees for financial plans are billed 50% in advance, with the balance due upon delivery of the financial plan.

---

### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

C2PW, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

For more details on the brokerage practices, see Item 12 of this brochure.

---

### **Prepayment of Client Fees**

Financial Plans are billed 50% in advance. The client may cancel within five business days of signing the Investment Advisory Agreement for a full refund. If cancellation occurs after five (5) business days, the client will be entitled to a pro-rata refund based on work completed.

---

### **External Compensation for the Sale of Securities to Clients**

C2PW does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of C2PW.

---

## **Item 6: Performance-Based Fees**

---

### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

C2PW does not use a performance-based fee structure because of the potential conflict of interest. Performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

---

## **Item 7: Types of Clients**

---

### **Description**

C2PW generally provides investment advice to individuals, high net worth individuals, charitable organizations, corporations and other business entities.

Client relationships vary in scope and length of service.

---

### **Account Minimums**

While C2PW does not require a minimum to open an account, some third-party money managers do require a minimum to open an account.

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

---

### Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

When creating a financial plan, C2PW utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds, ETFs, individual stocks and bonds.

In developing a financial plan for a client, C2PW's analysis may include cash flow analysis, investment planning, risk management, tax planning, estate planning and charitable planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include Hidden Levers, financial newspapers, Morningstar, magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

---

### Investment Strategy

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

---

### Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with C2PW:

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.

- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

## **Item 9: Disciplinary Information**

---

### **Criminal or Civil Actions**

The firm and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

The firm and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

The firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

---

### **Broker-Dealer or Representative Registration**

Neither C2PW nor any of its employees are registered representatives of a broker-dealer.

### **Futures or Commodity Registration**

Neither C2PW nor its employees are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

President Kirk Cassidy's has an outside business is as an insurance agent. He offers these services through the following companies: Senior Planning Advisors, LLC. Approximately 25% of Mr. Cassidy's time is spent in this practice. From time to time, he will offer clients advice or products from those activities. As an insurance agent, he may receive separate yet typical compensation.

Kirk Cassidy is also a minority owner of Yaske & Associates, PLLC, a CPA firm, providing tax services. Approximately 10% of Mr. Cassidy's time is spent in this practice. Clients will be offered services through this firm in which a separate fee will be charged. C2PW does not receive a portion of these fees, but as an owner, Mr. Cassidy will receive an economic benefit from this revenue.

These practices represent potential conflicts of interest because they give an incentive to recommend products and/or services based on the commissions or fees received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products or services through another insurance agent or CPA of their choosing.

---

**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

C2PW may at times utilize the services of other investment managers on the AssetMark platform to manage client accounts. Since the fee charged by C2PW remains the same, this does not create a conflict of interest. When referring clients to an investment manager, the client's best interest will be the main determining factor of C2PW. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services will be based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule will be attached to Exhibit D in C2PW's Investment Advisory Agreement.

---

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

---

**Code of Ethics Description**

The employees of C2PW have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of C2PW employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of C2PW. The Code reflects C2PW and its supervised persons' responsibility to act in the best interest of their client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients.

C2PW's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of C2PW may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

C2PW's Code is based on the guiding principle that the interests of the client are our top priority. C2PW's officers, directors, advisors, and other employees have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

---

**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

C2PW and its employees do not recommend to client's securities in which we have a material financial interest.

---

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

C2PW and its employees may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide C2PW with copies of their brokerage statements.

The Chief Compliance Officer reviews employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over the clients transactions.

---

**Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest**

C2PW does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist. However, employees may buy or sell securities at the same time they buy or sell securities for clients. In order to mitigate conflicts of interest such as front running, employees are required to disclose all reportable securities transactions as well as provide C2PW with copies of their brokerage statements.

The Chief Compliance Officer . reviews employee trades each quarter. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

**Item 12: Brokerage Practices**

---

**Factors Used to Select Broker-Dealers for Client Transactions**

C2PW may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the client's choosing. C2PW will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. C2PW relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by C2PW.

- *Directed Brokerage*

Clients should understand that not all Advisers require the use of a particular broker-dealer or custodian. By requiring clients to use a particular broker-dealer, C2PW may not achieve the most favorable execution of client transactions. Requiring the use of a specific broker-dealer may cost clients more money than if the client used a different broker-dealer or custodian. However, for compliance and operational efficiencies, C2PW has decided to require our clients to use broker-dealers and other qualified custodians chosen by C2PW.
- *Best Execution*

Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.



- *Soft Dollar Arrangements*

C2PW utilizes the services of custodial broker dealers. Economic benefits are received by C2PW which would not be received if C2PW did not give investment advice to clients. These benefits include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to C2PW's accounts, ability to conduct "block" client trades, electronic download of trades, balances and positions, duplicate and batched client statements, and the ability to have advisory fees directly deducted from client accounts.

A conflict of interest exists when the firm receives soft dollars. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to act in the best interest of the client and the services received are beneficial to all clients.

---

### **Aggregating Securities Transactions for Client Accounts**

C2PW is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of C2PW. All clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

## **Item 13: Review of Accounts**

---

### **Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved**

We provide account reviews as a part of our Asset Management Services. Our advisors will offer to meet with you either by phone or in person at least annually to review your account(s) and update any changes in your financial profile. Reviews can be conducted more frequently when we are experiencing significant changes in economic and market conditions, as requested by a client or at our discretion. Account reviews are performed at least quarterly by Investment Advisor Representative of C2PW. Account reviews are performed more frequently when market conditions dictate. Financial Plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

---

### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of client's accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

---

### **Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the advisor's or third party money managers' custodian. Client receives confirmations of each transaction in account from Custodian and an additional statement during any month in which a transaction occurs.

## **Item 14: Client Referrals and Other Compensation**

---

### **Economic benefits provided to the Advisory Firm from External Sources and Conflicts of Interest**

C2PW does not receive any economic benefits from external sources.

---

### **Advisory Firm Payments for Client Referrals**

C2PW does not compensate for client referrals.

## **Item 15: Custody**

---

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record or electronically, at least quarterly. Clients are urged to compare the account statements received directly from their custodians to reports prepared by C2PW.

Clients executed a limited power of attorney limiting C2PW the ability to only make withdrawals from the account solely for the purpose of deducting the agreed upon investment advisory fees.

C2PW is deemed to have indirect custody solely because advisory fees are directly deducted from client's account by the custodian on behalf of C2PW.

## **Item 16: Investment Discretion**

---

### **Discretionary Authority for Trading**

C2PW accepts discretionary authority to manage securities accounts on behalf of clients. C2PW has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. However, C2PW consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

The client approves the custodian to be used and the commission rates paid to the custodian. C2PW does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

## **Item 17: Voting Client Securities**

---

### **Proxy Votes**

C2PW does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, C2PW will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

## **Item 18: Financial Information**

---

### **Balance Sheet**

A balance sheet is not required to be provided because C2PW does not serve as a custodian for client funds or securities and C2PW does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

### **Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

C2PW has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

### **Bankruptcy Petitions during the Past Ten Years**

Neither C2PW nor its management has had any bankruptcy petitions in the last ten years.

---

## Supervised Person Brochure

Part 2B of Form ADV

---

**Kirk Cassidy**



### **C2Private Wealth**

#### **Main Office**

**29409 Haggerty Road  
Suite 200  
Livonia, MI 48152**

**PHONE: 866-211-1904**

**PHONE: 248-567-6688**

**FAX: 248-327-0845**

#### **Branch Office**

**1310 S. Main Street, Suite 15  
Ann Arbor, MI 48104**

#### **Branch Office**

**36800 Woodward Ave, Suite 101  
Bloomfield Hills, MI 48304**

#### **Branch Office**

**3622 Endeavor Avenue  
Columbia, MO 65201**

**EMAIL: [kcassidy@c2privatewealth.com](mailto:kcassidy@c2privatewealth.com)**

**WEBSITE: [www.c2privatewealth.com](http://www.c2privatewealth.com)**

This brochure supplement provides information about Kirk Cassidy and supplements Strategic Investment Advisors, LLC dba C2 Private Wealth's brochure. You should have received a copy of that brochure. Please contact Heather Lyon if you did not receive C2 Private Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Kirk Cassidy (CRD#5344038) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

---

#### Principal Executive Officers and Management Persons

##### Kirk Cassidy

- Year of birth: 1970
- 

#### Educational Background and Business Experience

##### Educational Background:

- Oakland Community College, 1989

##### Business Experience:

- Yaske & Associates, PLLC; Member; 12/2023 to Present
  - Cassidy and Associates Inc.; President; 11/2021 to Present
  - Starr & Cassidy, Inc.; President; 11/2021 to Present
  - Strategic Investment Advisors, LLC dba C2 Private Wealth; President/Owner/IAR; 03/2007 to Present
  - Senior Planning Advisors, LLC.; Owner/Insurance Agent; 03/2005 to Present
  - BRC Holdings, LLC; Member; 02/2013 to Present
  - BNTC Investments, LLC; Member; 03/2003 to 01/2012 to 01/2012
  - Retirement Education Foundation; Volunteer; 07/2015 to Present
  - TS Limited; Co-Owner; 12/2015 to 08/22/2023
  - Senior Planning Advisors - Ann Arbor, Inc.; Co-Owner/Insurance Agent; 11/2012 to 12/2021
  - Senior Planning Advisors – California, Inc.; Co-Owner/Insurance Agent; 03/2007 to 02/2019
  - SOR-Rehab; Owner; 01/1999 to 03/2004
- 

#### Disciplinary Information

None to report.

---

#### Other Business Activities

Kirk Cassidy has a financial industry affiliated business as an insurance agent. He offers these services through the following companies: Senior Planning Advisors, LLC. From time to time, he offers clients advice or products from those activities. Approximately 25% of his time is spent in this business. Kirk Cassidy volunteers time to the Retirement Education Foundation as a Financial Education Coach/Instructor. Approximately 15% of his time is spent on this activity.

Kirk Cassidy is also a minority owner of Yaske & Associates, PLLC, a CPA firm, providing tax services. Approximately 10% of Mr. Cassidy's time is spent in this practice. Clients will be offered services through this firm in which a separate fee will be charged. C2PW does not receive a portion of these fees, but as an owner, Mr. Cassidy will receive an economic benefit from this revenue.

These practices represent conflicts of interest because they give him an incentive to recommend products based on the commission and/or fee amount received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products and services through another insurance agent or CPA of their choosing.

Kirk Cassidy is also President of Cassidy and Associates Inc, a holding company for Strategic Investment Advisors, LLC. This does not create any conflict of interest.

---

### **Performance Based Fee Description**

Mr. Cassidy receives additional compensation in his capacity as an insurance agent, but he does not receive any performance-based fees.

---

### **Supervision**

Mr. Cassidy is responsible for all advisor supervision and formulation and monitoring of investment advice offered to clients. Mr. Cassidy is supervised by the Chief Compliance Officer of C2 Private Wealth. The CCO reviews Kirk's work through client account reviews, quarterly personal transaction reports.

The Chief Compliance Officer's contact information:

Telephone: 248-567-6688

---

## Supervised Person Brochure

Part 2B of Form ADV

---

Heather Lyon



### **C2 Private Wealth**

#### **Main Office**

**29409 Haggerty Road  
Suite 200  
Novi, MI 48377**

**PHONE: 866-211-1904**

**PHONE: 248-567-6688**

**FAX: 248-327-0845**

#### **Branch Office**

**1310 S. Main Street, Suite 15  
Ann Arbor, MI 48104**

#### **Branch Office**

**36800 Woodward Ave, Suite 101  
Bloomfield Hills, MI 48304**

#### **Branch Office**

**3622 Endeavor Avenue  
Columbia, MO 65201**

**EMAIL: [hlyon@c2privatewealth.com](mailto:hlyon@c2privatewealth.com)**

**WEBSITE: [www.c2privatewealth.com](http://www.c2privatewealth.com)**

This brochure supplement provides information about Heather Lyon and supplements Strategic Investment Advisors, LLC dba C2 Private Wealth's brochure. You should have received a copy of that brochure. Please contact Heather Lyon if you did not receive C2 Private Wealth's brochure or if you have any questions about the contents of this supplement.

Additional information about Heather Lyon (CRD#3011389) is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

---

#### Principal Executive Officers and Management Persons

##### Heather Lyon

- Year of birth: 1971
- 

#### Educational Background and Business Experience

##### Educational Background:

- SUNY Plattsburgh; BS, Business; 1993

##### Business Experience:

- Strategic Investment Advisors, LLC dba C2 Private Wealth; Chief Compliance Officer; 11/2023 to Present
  - Strategic Planning Advisors; Compliance Officer; 11/2023 to Present
  - Asset Allocation Strategies, LLC; CCO/COO/CFO; 07/2020 to 11/2023
  - GLP Investment Services, LLC; COO/CCO/CFO; 01/2020 to 11/2023
  - GLP & Associates/GLP Financial; COO; 12/2019 to 11/2023
  - The Vermont Agency; COO/CFO; 04/2018 to 12/2019
  - National Life Group; AVP/Sr. Client Partner; 05/2014 to 04/2018
  - Equity Services, Inc.; VP Operations; 10/2008 to 05/2014
  - Chittenden Securities, Inc.; President/CEO; 01/2005 to 10/2008
- 

#### Disciplinary Information

None to report.

---

#### Other Business Activities

Heather Lyon is also the Compliance Officer for Strategic Planning Advisors. Approximately 10% of her time is spent on this job. She is not insurance licensed and does not receive any additional compensation for this role, therefore there is no conflict of interest.

Heather Lyon is also a passive owner in several rental properties. As clients are not solicited for these businesses there is no conflict of interest.

---

#### Performance Based Fee Description

Ms. Lyon receives no additional compensation, nor does she receive any performance-based fees.

---

#### Supervision

Ms. Lyon is the Chief Compliance Officer of C2 Private Wealth. Ms. Lyon is supervised by Mr. Cassidy. She will adhere to the policies and procedures as described in the firm's Compliance Manual.

Heather Lyon's contact information:

Telephone: 248-567-6688

Email: [hlyon@c2privatewealth.com](mailto:hlyon@c2privatewealth.com)