

Strategic Investment Advisors, LLC dba C2 Private Wealth

Client Relationship Summary – Form CRS

March 3, 2025

Is An Investment Advisory Account Right For You?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

Item 1. Introduction

Strategic Investment Advisors, LLC dba C2 Private Wealth. (“C2PW”) is an investment adviser and provides advisory services for a fee rather than for brokerage commissions. As a retail investor, it is important to understand the differences between services and fees of an investment adviser and a broker-dealer. [Investor.gov/CRS](https://www.investor.gov/crs) offers free and simple tools to research firms and financial professionals. Additionally, it also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

Asset Management: C2PW offers discretionary 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’s discretionary authority (we can buy and sell investments in your accounts without asking you in advance) to execute selected investment program transactions as stated within the Investment Advisory Agreement.

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. Securities used will include exchange-traded funds (ETFs), individual bonds, individual equities, mutual funds, cash, or cash equivalents.

Qualified Plan Consulting: We offer Qualified Plan Consulting Services to individuals. We will meet with you for information gathering and then periodically review and if necessary make recommendations on how to allocate your participant account based upon the options available to you.

Financial Planning and Consulting: Services will be provided to you based on your selection on the Advisory Agreement and may include, but are not limited to, a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans that have recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. Services will be considered complete upon delivery of the plan.

For more information about our services, we recommended reading our [ADV Part 2A Items 4, 5,10.](#)

Conversation Starters to ask your adviser:

- *Given my financial situation, should I choose an investment advisory service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

Item 3. Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information regarding our fees and costs, review [ADV Part 2A Item 5.](#)

Our comprehensive suite of services offers discretionary asset management and financial planning services for a fee based on a percentage of assets under management, billed quarterly and in advance based upon the value of the assets at the end of the quarter.

You will also pay other types of fees, such as (but not limited to) custodian fees, account maintenance fees, and mutual fund and ETF management fees. Also, with certain investments such as variable annuities, you may have to pay fees such as “surrender

charges” to sell the investment. Generally, the more assets you have in the advisory account, the more you will pay in total fees. We therefore have an incentive to increase the assets in your account in order to increase our fees.

Financial Planning: We charge a fixed or hourly fee which is received in two installments: one at the commencement of the planning process, balance of the final payment is due upon delivery of completed plan.

Conversation Starter to ask your adviser:

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide you. Here are some examples to help you understand what this means.

Our advisory fees are based on a percentage of assets; therefore, we have an incentive to encourage you to increase the assets in your account. The more assets in your account, the more you pay in fees.

Some of our advisors are licensed insurance agents and may recommend you purchase insurance products and receive commissions on the sale of those products. When referring clients to purchase insurance, the client’s best interest will be the main determining factor. Conflicts of interest are mitigated by our fiduciary duty and adherence to our code of ethics. For more information about our conflicts of interest, we recommend reading our [ADV Part 2A, Items 5 and 10](#).

Conversation Starter to ask your adviser:

How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our advisors are compensated on a percentage of assets they manage, by a base salary, and with discretionary bonuses.

This is a conflict of interest because our advisors have an incentive to encourage you to increase your assets in your accounts and recommend you purchase investments that result in additional compensation to them. For more information about our conflicts of interest, we recommend reading our [Form ADV Part 2A Items 5 and 10](#).

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No, please visit Investor.gov/CRS for a free and simple search tool to research Strategic Investment Advisors and our financial professionals.

Conversation Starter to ask your adviser:

As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5. Additional Information

To find additional information about C2PW and to request a copy of the *relationship summary*, please go to www.seniorplanningadvisors.com or send us an email at hlyon@seniorplanningadvisors.com. If you would like to request a copy of the relationship summary or if you have any concerns about how your adviser is treating you, please contact Heather Lyon, Chief Compliance Officer of Strategic Investment Advisors via phone at 866-211-1904.

Conversation Starter to ask your adviser:

- *Who is my primary contact person?*
- *Is he or she a representative of an investment advisor or a broker-dealer?*
- *Who can I talk to if I have concerns about how this person is treating me?*



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

WEBSITE: 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.

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.
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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

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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

WEBSITE: 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.

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

WEBSITE: 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.

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

FACTS

WHAT DOES C2 PRIVATE WEALTH DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect, and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number and income • Account balances and payment history
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons we choose to share; and whether you can limit this sharing.

Reasons we can share your personal information	Do we share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes— information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes— information about your creditworthiness	No	We don’t share
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We don’t share

To limit our sharing	<ul style="list-style-type: none"> • Mail the form below <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information from the date you received this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
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Questions?	Call 248-567-6688
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Who we are									
Who is providing this notice?	Strategic Investment Advisors, LLC DBA C2 PRIVATE WEALTH								
What we do									
How do we protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.								
How do we collect your personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> • Open an account or deposit money 								
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes—information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing.								
What happens when I limit sharing for an account I hold jointly?	Your choices will apply to everyone on your account—unless you tell us otherwise.								
Definitions									
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.								
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.								
Joint marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.								
Mail-in Form									
<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply only to me</p>	<p>Mark any you want to limit:</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p> <p><input type="checkbox"/> Do not share my personal information with non-affiliates to market their products and services to me.</p>								
	<table border="1"> <tr> <td>Name</td> <td></td> </tr> <tr> <td>Address</td> <td></td> </tr> <tr> <td>City, State, Zip</td> <td></td> </tr> <tr> <td>Account #</td> <td></td> </tr> </table>	Name		Address		City, State, Zip		Account #	
	Name								
	Address								
	City, State, Zip								
Account #									
<p>Mail to: C2 Private Wealth 29409 Haggerty Road Suite 200 Novi, MI 48377</p>									



As a Registered Investment Adviser, Strategic Investment Advisors ("SIA"), doing business as, C2 Private Wealth (C2PW") we are required to communicate our position on business continuity practices.

C2PW is committed to insuring continuation of all essential functions through an effective and comprehensive program of business continuity planning in the event that we experience a disaster or serious emergency. C2PW considers business continuity planning to be an iterative process, requiring ongoing review to assess risks and appropriate responses. As a result, this plan may change, as necessary. Please feel free to contact C2PW at any time to receive the most recent version of our Business Continuity Statement.

C2PW's Business Continuity Planning Guidelines - C2PW in conjunction with its affiliated company, Senior Planning Advisors, has developed plans that include the ability to mitigate and/or recover from situations including, but not limited to power outages, major water leaks, fire, loss of water, severe weather, and any facilities failures that may cause business interruptions. Plans are designed to account for business interruptions of various lengths and scope and require that SIA be able to recover critical functions according to their time criticality. Key features of SIA's disaster recovery planning include annual reviews of the following:

- Identification of all mission critical systems.
- A review of financial and operational risks.
- Alternate communications between C2PW and its vendor partners.
- Employee safety strategies and communications.
- Systems and telecommunications accessibility.
- Alternate physical site location and preparedness.

C2PW's Contingency Planning and Business Recovery - C2PW mitigates risks to reduce potential issues and impact. In addition to following the guidelines stated above, C2PW's recovery plans also include the following:

Employee Safety - C2PW places an emphasis on employee safety. We conduct evacuation drills which are led by our BCP Officer.

Separate Sites - C2PW has its headquarters in Livonia, MI and additional offices for certain operations and sales functions. These separate sites provide business continuity for certain critical functions.

Emergency Communication - There are pre-established processes for rerouting critical hotline numbers. In the event of a site outage, customers should experience minimal downtime in their ability to access information via the C2PW website and customer service telephone numbers or emails.

Alternate Site Tests - SIA conducts disaster recovery tests for its critical functions at least annually. Tests include verification of critical applications and infrastructure. Notification to Clients - In the event of an outage, C2PW will reroute client communications to an offsite location(s) and post outage status information on our website. Notification will include information regarding length of outage, instructions for contacting C2PW, and support information (e.g., where to send faxes, issues pertaining to data transmissions and communications).

Regulatory Reporting - C2PW's business continuity plans are designed to ensure that, regardless of the length of an outage at a primary location, C2PW's ability to continue to meet regulatory requirements, as mandated by the Securities and Exchange Commission, would not be impacted.

Communications with Regulators - C2PW will communicate with its regulatory authorities regarding the nature and extent of any significant outage at a primary location, as required by applicable law and regulation.

Access to Your Funds - A site outage at C2PW would not impact your ability to have access to your available funds, as C2PW's business continuity plans are designed to ensure sustained service. However, your ability to your available funds may be impacted by market events outside of C2PW's control, such as when the market was closed following the September 11 tragedy. Since C2PW does not Custody your funds or assets, you will have access through the Custodian, Fidelity Investments. You can directly access your account(s) on-line at <https://www.fidelity.com> or via one of these contact methods: <https://www.fidelity.com/customer-service/contact-us>.



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C2 Private Wealth's Fiduciary Acknowledgement

This notice is being sent to you on behalf of SC2 Private Wealth (hereinafter referred to as, “the Firm,” “C2PW,” “we,” or “us.” We are providing you with the following acknowledgment for purposes of complying with the US Department of Labor’s (“DOL”) Prohibited Transaction Exemption 2020-02 (“PTE 2020-02”), where applicable. This acknowledgment will be effective when we rely on PTE 2020- 02. If there is a conflict between this disclosure and your agreement with the Firm, this disclosure will govern.

Fiduciary Acknowledgment

Tax-qualified accounts include defined contribution and defined benefit plans: (1) employer-sponsored retirement plans (“Plans”) that are subject to the Employee Retirement Income Security Act Title I (“ERISA”), and individual retirement accounts (collectively “IRAs”) that are not subject to ERISA, but are subject to section 4975 of the Internal Revenue Code (the “Code”).

We are making investment recommendations to your retirement plan account or individual retirement account as fiduciaries within the meaning of Title I of The Employee Retirement Income Security Act and /or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money or otherwise are compensated creates some conflicts with your financial interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care (give prudent advice) to you;
- Not put our financial interests ahead of yours;
- Avoid misleading statements about our conflicts of interest, fees, and Firm investments;
- Follow established policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than what is reasonable for our services; and
- Give you basic information about our conflicts of interest.

Rollovers from an Employer Sponsored Plan

In general, the firm and its financial professionals provide (1) general information and education to you about the factors to consider when deciding whether to move retirement plan assets to another account, or (2) a recommendation that you roll or transfer assets from the retirement plan to a qualified account at another custodian. If we provide you with a recommendation, you understand and agree that our analysis of any costs and services provided by your retirement plan, as compared to any costs charged by the Firm and/ or the new custodian, is dependent on the information you provide.

For a description of our fees, services, and conflicts of interest, please refer to our Form CRS, Form ADV and Form ADV Part 2A ("Brochure").

3.2025