



Firm Brochure

Form ADV Part 2A

March 29, 2019

BSW Wealth Partners, Inc., a Public Benefit Corporation

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This brochure provides information about the qualifications and business practices of BSW Wealth Partners, Inc., a Public Benefit Corporation (“BSW”). If you have any questions about the contents of this brochure, please contact us at 303-444-9696 or info@bsw.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Additional information about BSW is available on the SEC website at www.adviserinfo.sec.gov.

BSW is registered with the SEC as an investment adviser and conducts itself accordingly. Such registration requires that we conduct our business in accordance with the Investment Advisers Act of 1940 but does not imply a certain level of skill or training.

Item 2 - Material Changes

BSW is required to disclose material changes to each annual update to its Form ADV Part 2A (the “Brochure”).

This Brochure dated March 29, 2019, replaces the March 28, 2018 version. Key updates were made to the following sections(s) since the last annual amendment:

- Item 4 – Advisory Business – was revised to reflect BSW Wealth Partners, Inc., a Public Benefit Corporation as the successor to BSW Wealth Partners, LLC. Beginning March 14, 2019, advisory services are provided by BSW Wealth Partners, Inc., a Public Benefit Corporation. BSW elected to change its corporate and legal structure from a limited liability company to a Public Benefit Corporation in order to more closely align its values with its legal structure. In addition, BSW’s ownership was updated as were Regulatory Assets Under Management (“RAUM”).
- Item 5 – Fees and Compensation – was revised to include specifics regarding the method and timing of advisory fees.
- Item 7 – Types of Clients – was revised to more accurately list client types.
- Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading – was revised to reflect an amended Code of Ethics which will require pre-clearance of certain personal securities transactions.
- Item 15 – Custody – was revised to reflect that BSW is deemed to possess a level of authority and/or legal capacity and for this reason BSW is considered to have custody of such assets. Such capacity comes from BSW’s ability to debit advisory fees from the client’s account, our standing letters of authorization for certain clients, and our general power of attorney for certain clients.

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Item 4 - Advisory Business

Overview: BSW Wealth Partners, Inc. a Public Benefit Corporation is a Colorado Public Benefit Corporation (“PBC”) founded in 1992. BSW is a fee-only, woman-founded, 100% employee owned, independent wealth advisor providing financial and investment advice to private investors from offices in Boulder and Denver. BSW’s clients are primarily successful individuals and families - sometimes spanning multiple generations - who are wealthy enough to need a partner to assist them with the primary goal of protecting and growing their capital over the long-term.

Beginning March 14, 2019, advisory services are provided by BSW Wealth Partners, Inc., a Public Benefit Corporation as the successor to BSW Wealth Partners, LLC. In 2019, BSW elected to change its corporate and legal structure from a limited liability company to a PBC. PBCs are for-profit enterprises that also vow to do good in the world and by their stakeholders. Although the corporate and legal form of BSW changed, the people and services remain the same. BSW’s statement of public purpose is:

To 'Make Life Better' for BSW clients, staff and our broader community by building a long-term sustainable and environmentally considerate business that helps our clients and stakeholders achieve both financial security and lives of meaning, abundance, and fulfillment.

Ownership: BSW is currently owned by eight individuals, each of whom is actively engaged in BSW’s business:

Debi Baydush:	10.00%	Raliegh Riddoch	5.00%
Drew Simon:	21.00%	Tim Wojtalik	5.00%
Benjamin Weaver:	25.00%	Matthew Samek	3.00%
David Wolf:	29.00%	Julie Martinez	2.00%

Services: BSW provides investment management and other financial advisory services. Services are based on a client’s individual needs and may include:

Investment Supervisory Services:

- Analyzing client’s investments coming under BSW’s supervision;
- Determining client’s short and long-term investment objectives, time horizon, concerns, experience, and risk profile;
- Developing an investment plan and related financial strategies designed to achieve client’s objectives, including investment policy guidelines;

- Implementing investment strategies as appropriate, including portfolio monitoring, periodic rebalancing, and specific portfolio changes, as appropriate;
- Monitoring client's portfolio on a regular basis and recommending specific changes as necessary;
- Preparing periodic financial security analysis;
- Reviewing annual contribution and withdrawal summary;
- Managing required minimum distributions;
- Maintaining regular communication with the client; and
- Preparing periodic investment reports for client.

Other Financial Advisory Services:

- Wealth Planning: Helping clients understand the level of assets, allocation, savings, and long-term investment returns needed to achieve their financial goals.
- Tax & Estate Planning / Coordination: Discussing general tax, wealth transfer and estate planning concepts with clients and qualified attorneys, CPA's and other professionals to fully develop suitable strategies. BSW does not provide legal advice and its Tax & Estate Planning advice should not be considered legal advice. BSW will coordinate the resulting strategies with client's investment and financial planning, as appropriate.
- Diversification Planning: Designing and implementing strategies to manage risk and handle concentrated positions of various assets such as real estate, business assets, inherited stock, founder's stock, optioned stock, and highly appreciated (low basis) stock.
- Charitable Gifting Strategies: Discussing and evaluating strategies to meet client's charitable objectives, including the potential economic and tax implications of such strategies. This may include assisting with establishing, funding and managing charitable trusts, foundations, and not-for-profit entities.
- Employee Stock Options: Designing and implementing strategies for the funding, exercise, and sale of employee stock options, including analysis of the economic and income tax implications of such strategies.

- Specialized Planning: Assisting with business/exit planning; cash flow planning; college planning; retirement planning; debt planning; and, philanthropic planning.

Account Restrictions: Clients may impose reasonable restrictions on investing in certain securities, types of securities or industry sectors by including such restrictions in BSW's written investment policy guidelines.

Because some types of investments involve certain additional degrees of risk, they will only be implemented or recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

Wrap Fee Programs: BSW does not participate in, nor is it a sponsor of, any wrap fee programs.

Assets Under Management: As of December 31, 2018, BSW's total assets under management were approximately \$1,072,376,760.

- Assets managed on a discretionary basis were approximately \$1,023,403,497.
- Assets managed on a non-discretionary basis were approximately \$48,973,263.

General Statement of Ethical Principles

- BSW will, at all times, place the interests of its clients first;
- All personal securities transactions will be conducted in such a manner as to avoid any actual or potential conflict of interest or any abuse of BSW's position of trust and responsibility;
- BSW will not take inappropriate advantage of its position;
- BSW will uphold the fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential;
- BSW will uphold the principle that independence in the investment decision-making process is paramount; and
- BSW will always act with honesty, integrity, and professionalism.

Item 5 - Fees and Compensation

BSW is an independent, fee-only advisory firm. As such, BSW is compensated for its services using one or more of the methods described below. BSW's billing method will be disclosed to and agreed to by client per the terms of the client's written investment advisory agreement with BSW.

Compensation Methods: BSW's fees are described generally below and detailed in each client's advisory agreement or applicable account documents. Clients may choose

between: (1) an asset-based fee; or (2) a fixed fee, as further described below. The following fee schedule represents the maximum compensation that BSW may receive. All fees are subject to negotiation.

- (1) **Asset Based Fee:** BSW generally charges an asset-based fee for its asset management and sub-advisory services, calculated according to the following fee schedule:

<u>ASSETS UNDER MANAGEMENT</u>	<u>MAXIMUM ANNUAL RATE</u>
The first \$2,000,000 of client assets	1.00%
The next \$3,000,000 of client assets	0.75%
The remainder	0.50%

Minimum Fee: BSW's minimum fee varies based on the service selected by each client, subject to the following minimum fee schedule:

<u>SERVICE</u>	<u>MINIMUM FEE</u>
Wealth Management	\$1,250 per quarter
Private Client	\$2,500 per quarter
Family Office	\$10,000 per quarter

- (2) **Fixed Fee:** BSW and the client may agree to negotiate a fixed quarterly fee instead of an asset-based fee for BSW's investment management, and/or advisory services. Fixed fees often arise where BSW provides non-discretionary investment management services. The fixed fee is negotiable by the client and BSW.

Hourly Fee: When providing services outside of the scope of an investment advisory agreement, BSW may charge an hourly fee. In such cases, BSW enters into a separate agreement with the client setting forth terms and the hourly fee. BSW's hourly billing rate is generally \$300 per hour.

Negotiability of Advisory Fees: BSW retains the discretion to negotiate alternative fees and fee arrangements, or waive fees entirely based on particular elements of the client portfolio, such as the complexity of the client, assets to be placed under management, anticipated future additional assets, the existence of related accounts, portfolio style, account composition, employee-related accounts, and reports, among other factors.

Travel Expenses: Travel related expenses incurred by BSW on client's behalf will be reimbursed by the client.

Other Expenses: In addition to BSW's compensation described above, the client will incur various trading commissions, transaction fees, mutual fund expenses, separately managed account or sub-manager fees and administrative costs in the implementation of BSW's recommendations. BSW will receive no compensation from these sources.

Method and Timing: BSW's fees are billed and payable quarterly in advance based on the total value of all assets under BSW's supervision on the last day of the previous quarter. Clients may select whether fees are to be deducted from client's BSW managed assets or paid from other sources.

Termination and Refunds: Client or BSW may terminate their agreement at any time upon written notice. If BSW and client's relationship is terminated prior to the end of a billing period, BSW will prorate and refund the paid but unearned portion of client's fee for that period back to the client.

Item 6 – Performance-Based Fees

BSW is required to disclose if any accounts are charged performance-based fees (fees based on a share of capital gains or on capital appreciation of the assets of a client). This type of fee structure may, under certain circumstances, create a conflict with client interests. BSW does not charge any performance-based management fees.

Item 7 - Types of Clients

BSW advises and provides financial planning services to a diverse cross-section of clients, including:

- Individuals and Families (other than high net worth individuals);
- High net worth individuals;
- Pension and Profit-sharing plans;
- Trusts and Estates;
- Charitable and other not-for-profit organizations;
- Other business entities not included above.

BSW does not have a required minimum account size though, as indicated previously in **Item 5 – Fees and Compensation**, BSW does have a minimum quarterly fee.

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

BSW takes a top down approach to tactical asset allocation and uses a relative growth/valuation framework to determine sub-asset classes. This top down framework allows BSW to assess the investing environment and provide recommendations as to when and where it may be advantageous to modify exposures within the asset classes.

Growth Strategies: BSW's growth strategies consist of investments spanning a broad range of asset classes that are selected for their long-term risk/return characteristics as well as their correlation to the overall markets and BSW's portfolio as a whole. The resulting blended allocation is used as the foundation for the client's growth portfolio.

The portfolio is rebalanced as often as necessary, no less than twice a year, to reflect BSW's views on current and longer-term global economic conditions, valuations and investor/market psychology. Other asset classes and opportunistic investments are added to the growth portfolio to create a customized allocation that is appropriate for client's investment objectives, time horizon, and risk tolerance. Examples of investments which may be included as part of BSW's growth strategies include equities, mutual funds, exchange traded funds, real estate, hedge funds, and private equity placements.

Risks Associated with Growth Strategies: Investing for growth involves risks of loss that clients should be prepared to bear including total loss of investment placement vehicles and alternative investments are principal, fluctuation of investment values, illiquidity, inability to liquidate investments without incurring losses, total loss of purchasing power and total loss of income. More specifically, the following risks specific to investing in private described in greater detail:

Risk of Private Investment Vehicles: BSW recommends that certain clients invest in privately placed collective investment vehicles, such as private equity placements. Because private investment vehicles are not registered investment companies, they are not subject to the same regulatory reporting or oversight of a registered entity.

Alternative Investments: BSW may use alternative investments when permitted by the particular client's investment objectives. These funds may trade on margin or otherwise leverage positions, thereby potentially increasing the risk to the client. There are numerous other risks in investing in these securities. The client will receive a private placement memorandum and/or other documents explaining such risks.

Fixed Income Strategies: Fixed income investments such as bonds, notes, and certificates of deposit are intended to provide diversification, generate income, and to preserve and protect assets. Generally, the stabilizing influence of fixed income comes at the cost of lower returns relative to growth investments. BSW's fixed income portfolios generally consist of high quality domestically issued bonds, both taxable and tax-free. Examples of investments which may be included as part of BSW's fixed income strategies include individual government, municipal, and corporate bonds, certificates of deposits, direct loans, mutual funds, exchange traded funds and money markets.

Risks Associated With Fixed Income Strategies: Fixed Income investing involves risks of loss that clients should be prepared to bear including total loss of purchasing power, total loss of income, fluctuation of investment values, total loss of investment principal, illiquidity, and inability to liquidate investments without incurring losses.

Risks associated with investments offered through BSW may include:

All investments and investment strategies involve various risks, and there is no guarantee that any investment or investment strategy will meet its objective. BSW will keep in mind each client's investment objectives, risk tolerance, time horizon and other pertinent information when recommending an investment or investment strategy. However, investing in securities involves the risk of loss of principal that clients should be prepared to bear.

Credit Risk: The financial soundness of an issuer (borrower) is often measured by a credit rating agency such as Standard & Poors, Moody's or Fitch. The rating agencies attempt to measure the ability of an issuer to pay the interest and principal payments on their debt. Typically, the higher the issuer's credit rating the lower the expected investment return will be.

Liquidity Risk: Liquidity risk is the risk that there may be limited buyers for a security when an investor wants to sell. Typically, this results in a discounted sale price in order to attract a buyer.

Default Risk: A default occurs when an issuer fails to make payment on a principal or interest payment.

Event Risk: Event risk is difficult to predict because it may involve natural disasters such as earthquakes or hurricanes, as well as changes in circumstance from regulators or political bodies.

Political Risk: Political risk is the risk associated with the laws of the country, or to events that may occur there. Particular political events such as a government's change in policy could restrict the flow of capital.

Market Risk: Market risk refers to the financial markets as a whole declining, causing the value of all securities to decline regardless of the individual characteristics of a particular security.

Mutual Funds and Exchange Traded Funds (ETFs) Risks: An investment in a mutual fund or ETF involves risk, including the loss of principal. Mutual fund and ETF shareholders are necessarily subject to the risks stemming from the individual issuers of the fund's underlying portfolio securities. Such shareholders are also liable for taxes on any fund-level capital gains, as mutual funds and ETFs are required by law to distribute capital gains in the event they sell securities for a profit that cannot be offset by a corresponding loss.

Duration Risk: Duration is a way to measure a bond's price sensitivity to changes in interest rates. The duration of a bond is determined by its maturity date, coupon rate, and call feature. Duration is a way to compare how different bonds will react

to interest rate changes. If a bond has a duration of five (5) years it means that the value of that security will decline by approximately five percent (5%) for every one percent (1%) increase in interest rates.

Inflation Risk: Inflation is the decline in the purchasing power of a dollar, meaning today's dollar will buy less tomorrow.

Interest Rate Risk: Interest rate risk refers to the relationship between the value of a bond and changing interest rates. A rise in interest rates will cause a decline in the value of a bond holding.

Reinvestment Risk: Reinvestment risk is the risk that future interest and principal payments may be reinvested at lower yields due to declining interest rates.

Tax Risk: For municipal bonds, depending on the client's state of residence, the interest earned on certain bonds may not be tax-exempt at the state level. Also, changes in federal tax policy may impact the tax treatment of interest and capital gains of an investment.

Disclosure Risk: The amount of public information available on any public or private investment.

Regulatory Risk: Market participants are subject to rules and regulations imposed by one or more regulators. Changes to these rules and regulations could have an adverse effect on the value of an investment.

Concentration Risk: The risk of amplified losses that may occur from having a large portion of your holdings in a particular investment, asset class or market segment relative to your overall portfolio.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of them or the integrity of their management.

As of the date of this Brochure, BSW does not have any legal, financial or other disciplinary items to report to you. BSW is obligated to disclose any disciplinary event that would be material to you when evaluating a client/adviser relationship.

Item 10 - Other Financial Industry Activities and Affiliations

BSW's management persons are not registered, nor do any management persons have an application pending to register, as a broker-dealer, futures commission merchant,

commodity pool operator, commodity trading advisor, or an associated person of the foregoing entities.

BSW is required to disclose any relationship or arrangement that is material to its advisory business or to its clients with certain related persons.

R3 Investments, LLC

R3 Investments, LLC (“R3”) is a wholly-owned subsidiary of BSW. R3 earns advisory fees from non-BSW clients. R3’s compensation methods are described in R3’s ADV Part 2, which is provided to R3 clients initially and annually thereafter. BSW clients may utilize R3 investment strategies.

BSW does not receive compensation, directly or indirectly, from any source to whom it may refer or recommend clients.

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

Code of Ethics: As required by the Advisers Act, BSW has adopted a Code of Ethics (the “Code”) that emphasizes a set of high standards of conduct for all employees to observe. The Code governs a number of potential conflicts of interest which exist when providing advisory services to BSW clients. This Code is designed to enable BSW to meet its fiduciary obligation to BSW clients (or prospective clients) and to instill a culture of compliance within BSW. An additional benefit of the Code is to assist BSW in preventing violations of securities laws.

The Code is distributed to each employee at the time of hire and annually thereafter, and it is available on BSW’s intranet. BSW also supplements the Code with ongoing monitoring of employee activity.

The Code includes (among other things):

- Requirements related to confidentiality of client information;
- Prohibitions on:
 - Insider trading (if we are in possession of material, non-public information);
 - The acceptance of gifts and entertainment that exceed our policy standards;
- Requirements and reporting of gifts and/or entertainment;
- Pre-clearance of applicable securities transactions (beginning 2nd quarter 2019);
- Reporting of personal securities transactions; and,
- Disclosure of accounts over which employees have beneficial interest.

On an annual basis, BSW requires all employees to certify that they are in compliance with the Code.

Potential Conflicts of Interest: BSW offers many different products and services and there are several potential conflicts of interest which may arise, including, but not limited to, those identified below. BSW has adopted and continues to adopt, policies and procedures to address such potential conflicts of interest.

BSW may recommend and/or direct the investment of client assets to be managed by R3. Such recommendations result in a conflict of interest due to the common control. However, this conflict is mitigated as BSW does not charge additional fees to client accounts jointly managed by R3.

Participation or Interest in Client Transactions: BSW does not recommend to clients, or buy or sell for client accounts, securities in which BSW or a related person has a material financial interest.

Personal Trading: BSW employees may trade for their own accounts in securities which are purchased or sold for BSW's clients. Because BSW permits such personal trading, this creates the potential conflict that employees could use their knowledge of pending client transactions in an attempt to benefit their own personal transactions. For example, if an employee owns a security the employee knows BSW will be selling out of a client's account, the employee could sell the personal holding ahead of time in an effort to obtain a higher price than might exist when the client account holdings are sold.

To address conflicts related to personal trading, beginning in second quarter 2019, the Code will require employees to pre-approve many types of securities transactions. In order to avoid either an actual or apparent conflict of interest, BSW will disclose the names of all such securities to client upon request.

You may request a copy of BSW's Code by contacting us at the address, telephone number or email on the cover of this Brochure.

Item 12 - Brokerage Practices

Broker/Dealer Selection: BSW will recommend and select custodians/broker-dealers in a manner it believes to be consistent with its duty to seek "best execution," which is the obligation to seek to execute securities transactions for a client on terms that are the most favorable to the client under the circumstances. BSW does not charge a premium or commission on transactions, beyond the actual cost imposed by the custodian/broker-dealer.

Aggregate Trading: As a general matter, BSW will seek to allocate securities purchased for client accounts in a fair and equitable manner and will select the appropriate brokers consistent with its duty to seek best execution, except for those

accounts with specific brokerage direction. If BSW buys or sells the same securities on behalf of more than one client, it may, but is under no obligation to, aggregate or bunch, to the extent permitted by applicable law and regulations, the securities to be purchased or sold for multiple clients in order to seek more favorable prices, lower brokerage commissions or achieve more efficient execution. In such cases, BSW will place an aggregate order with the broker on behalf of all such clients or its affiliates, partners, or employees or accounts in which BSW or its affiliates, partners, or employees have an interest. Securities purchased or proceeds of securities sold through aggregated orders will be allocated to the account of each client that bought or sold such securities at the average execution price. If less than the total of the aggregated orders are executed, purchased securities or proceeds will be allocated pro rata among the participating clients in proportion to their planned participation in the aggregated orders, or other applicable criteria determined in good faith by BSW.

Directed Brokerage: BSW permits clients to direct transactions to the broker/dealer of their choice. When applicable in such circumstances, BSW will advise the client that client may be unable to achieve most favorable execution of their transactions and/or that directing brokerage may cost them more money including higher brokerage commissions and transaction costs and/or less favorable prices than client accounts for which BSW selects the broker.

Research and Other Soft Dollar Benefits: While BSW has no formal soft-dollar program in which soft-dollars are used to pay for third-party services, BSW may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions (“soft-dollar benefits”). BSW may enter into soft-dollar arrangements within the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will be advantaged from soft-dollar benefits, whether or not the client’s transactions paid for it. While BSW may not be able to allocate soft-dollar benefits to client accounts proportionate to any soft-dollar benefits generated, the fact that we manage a single strategy makes it more likely that any such benefits will be allocated proportionately. BSW benefits by not having to produce or pay for the research, products or services, and BSW will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that BSW’s acceptance of soft-dollar benefits may result in higher commissions charged to the client.

Cross Transactions: BSW may engage in cross transactions to the extent permitted by, and in accordance with, the advisory agreement and all applicable laws and regulations. Cross transactions may be deemed to occur in instances where, for example, one BSW Client is reducing an allocation to an Underlying Manager or position and another BSW Client simultaneously is increasing its allocation of such Underlying Manager or position. As it has no affiliated broker-dealer engaged in the trading of securities, BSW does not engage in agency cross transactions.

Item 13 - Review of Accounts

Reviews: Client accounts are electronically updated each business day. Account holdings are monitored on an ongoing basis. All client accounts are reconciled on at least a quarterly basis. Client portfolios are reviewed in detail at least quarterly. In addition, accounts are reviewed in the event of investment policy changes, changes to BSW's recommended portfolio and changes in individual client circumstances.

Reviewer: Accounts are reviewed by the client's portfolio manager, investment advisor representative, and/or a principal of the firm. Accounts are reviewed for investment allocation, holdings, performance and risk relative to client's goals and objectives.

Reports: Clients receive trading confirmations and monthly statements from all firms having custody of client's liquid assets. Clients also receive periodic (generally quarterly) written reports and account valuations prepared by BSW. Periodic reports evaluate holdings, asset allocation, investment returns, and performance. Reports will be prepared more frequently than quarterly upon request by the client.

Item 14 - Client Referrals and Other Compensation

BSW is required to provide each client with information regarding any relationships where BSW compensates individuals for client referrals. BSW greatly appreciates referrals from satisfied clients and partners but does not directly or indirectly compensate anyone who is not our supervised person for those referrals.

BSW will occasionally host client events for which BSW may be reimbursed for expenses via sponsorship(s) from entities such as unaffiliated registered investment advisory firms, professional (attorney, CPA, etc.) firms, and investment managers. In order to avoid an actual or apparent conflict of interest, BSW confers no preference on sponsors and makes no representations or agreements with sponsors as to current or future utilization of the sponsor's investments or services.

Item 15 - Custody

All clients' accounts and assets are held in custody by unaffiliated qualified custodians, banks, broker/dealers, mutual fund company, or transfer agent; not with or by BSW or any of its associates. However, with respect to certain assets, we do possess a level of authority and/or legal capacity and for this reason BSW is considered to have custody of such assets. Such capacity comes from our ability to debit advisory fees from the client's account, our standing letters of authorization for certain clients, and our general power of attorney for certain clients.

Clients should receive at least quarterly statements from the qualified custodian that holds and maintains the client's investment assets. BSW urges each client to carefully review such statements and compare such official custodial records to the account statements that we provide. BSW statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. Clients should not hesitate to contact BSW if there are any questions regarding their statements.

Item 16 - Investment Discretion

BSW manages most client accounts on a discretionary basis. Prior to granting BSW discretionary authority, the client will approve such authority in client's written advisory agreement with BSW and shall execute all appropriate authorizations with qualified custodians for such authority. The client may elect to limit the scope of such authority at any time by providing written notice to BSW.

Item 17 - Voting Client Securities

BSW abstains from voting proxies, except where permitted in the client's advisory agreement. When voting on behalf of a client, BSW will only cast proxy votes consistent with the best interest of the client and will identify any conflicts of interest that may arise related to voting proxies and disclose these to clients accordingly. BSW will retain documentation of any proxy research, vote information and related records related to the voting of proxies on behalf of clients.

Item 18 - Financial Information

As an advisory firm having custody and exercising discretionary authority regarding client accounts, we are also required to disclose any financial condition reasonably likely to impair our ability to meet our contractual obligations to clients. BSW has no financial commitment that impairs its ability to meet our contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

The requirement to provide an audited balance sheet is not applicable to BSW as it does not require or solicit prepayment of advisory fees six months or more in advance.

Item 1 – Cover Page

Aaron Deitz

BSW Wealth Partners

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(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Aaron Deitz that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Aaron Deitz is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Aaron Deitz

Born: 1984

Education:

- Graduated with an M.B.A. from DePaul University in 2011.
- Graduated with a B.A. in Economics from University of Colorado in 2007.

Professional Designations:

- Series 65 securities license

Employment History:

- Portfolio Manager with BSW Wealth Partners from April 2018 to present.
- Associate with Focused Energy from November 2017 to March 2018.

- Vice President of Finance with Sonotize from June 2017 to November 2017.
- Operations Analyst with RMB Capital Management from January 2015 to February 2017.
- Director of Operations with Logan Stone Capital from January 2012 to December 2014.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Deitz serves in a volunteer capacity as a Venture Capital Senior Analyst for Rockies Venture Fund. Mr. Deitz does not receive cash compensation for his work with the Rockies Venture Club although the position does allow him to participate in a portion of the carry for certain deals.

There is no affiliation or other business relationship between BSW Wealth Partners and Rockies Venture Fund.

Item 5 – Additional Compensation

Mr. Deitz's total compensation is based, in part, on the amount of assets under management that Mr. Deitz introduces to the firm. Accordingly, Mr. Deitz has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Deitz does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Deitz is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Mr. Deitz, please contact David Wolf or Tim Wojtalik at 303-444-9696.

Item 1 – Cover Page

Benjamin R. Weaver

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
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(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Benjamin R. Weaver that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Benjamin R. Weaver is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Benjamin R. Weaver

Born: 1970

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2001.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Mr. Weaver has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Mr. Weaver has been in the business since 1997. Finally, Mr. Weaver has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with a B.A. in Economics from the University of Richmond, VA in 1993.

Employment History:

- Financial Advisor/ Principal with BSW Wealth Partners from January 2010 to present.
- Member/investment advisor representative with R3 Returns, LLC from April 2012 to January 2015.
- Financial Advisor/Managing Principal with Baydush Simon Weaver from January 2003 to December 2009.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Weaver is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of his ownership of BSW Wealth Partners. The recommendation by Mr. Weaver that any client seek investment advisory services from R3 presents a conflict of interest, as Mr. Weaver could have the incentive to make such a recommendation based on compensation to be received via Mr. Weaver’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Mr. Weaver’s total compensation is based, in part, on the amount of assets under management that Mr. Weaver introduces to the firm. Accordingly, Mr. Weaver has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client’s best interests.

Mr. Weaver does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Weaver is a Principal of BSW Wealth Partners. You may contact him directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Craig Seidler

BSW Wealth Partners

2336 Pearl Street, Boulder, CO. 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Craig Seidler that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Craig Seidler is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Craig Seidler

Born: 1968

Education:

- Graduated with an M.B.A from the University of Colorado at Denver in 2002.
- Graduated with a B.S. in Business from the University of Vermont in 1991.

Professional Designations:

- Series 65 securities license.

Employment History:

- Portfolio Manager with BSW Wealth Partners from January 2010 to present.

- Chief Investment Officer with R3 Returns, LLC, a wholly owned subsidiary of BSW Wealth Partners, from March 2018 to present.
- Portfolio Manager and Portfolio Mechanic with Baydush Simon Weaver from September 2003 to December 2009.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Seidler serves as Chief Investment Officer for R3 Returns, LLC, an affiliated SEC-registered investment advisory firm. The recommendation by Mr. Seidler that any client seek investment advisory services from R3 Returns, LLC presents a conflict of interest, as Mr. Seidler could have the incentive to make such a recommendation based on compensation to be received, rather than basing such recommendation on a particular client's need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3 Returns, LLC.

Item 5 – Additional Compensation

Mr. Seidler's total compensation is based, in part, on the amount of assets under management that Mr. Seidler introduces to the firm. Accordingly, Mr. Seidler has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Seidler does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Seidler is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Mr. Seidler, please contact Benjamin Weaver or David Wolf at 303-444-9696.

Item 1 – Cover Page

David C. Wolf

BSW Wealth Partners

2336 Pearl Street, Boulder, CO. 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about David C. Wolf that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about David C. Wolf is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

David C. Wolf

Born: 1974

Education:

- Graduated with a J.D. from the University of Colorado at Boulder in 2001.
- Graduated with an M.B.A. from the Leeds School of Business at the University of Colorado at Boulder in 2001.
- Visiting student at St. Catherine’s College Oxford University in Oxford, England in 1995.
- Graduated with a B.A. from DePauw University in 1996.

Professional Designations:

- Member, Colorado Bar Association.
- Series 65 securities license.

Employment History:

- Managing Principal with BSW Wealth Partners from January 2010 to present.
- Managing Principal with R3 Returns, LLC, a wholly owned subsidiary of BSW Wealth Partners, from 2012 to present.
- Chief Operations Officer/Managing Principal with BSW Wealth Partners from January 2016 to September 2018.
- Chief Investment Officer/Managing Principal with BSW Wealth Partners from January 2010 to December 2015.
- Portfolio Manager/ Principal with Baydush Simon Weaver from April 2002 to December 2009.
- Chief Investment Officer/Business Strategy/Principal with R3 Returns from January 2012 to present.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Wolf serves as Managing Principal for R3 Returns, LLC, an affiliated SEC-registered investment advisory firm. The recommendation by Mr. Wolf that any client seek investment advisory services from R3 Returns, LLC presents a conflict of interest, as Mr. Wolf could have the incentive to make such a recommendation based on compensation to be received, rather than basing such recommendation on a particular client's need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3 Returns, LLC.

Mr. Wolf serves on the advisory board for Renewal3 Fund which invests in early growth stage companies in Canada and the United States. Mr. Wolf is not compensated for his service on the advisory board. There is no affiliation or other business relationship between BSW Wealth Partners and Renewal Funds.

Item 5 – Additional Compensation

Mr. Wolf's total compensation is based, in part, on the amount of assets under management that Mr. Wolf introduces to the firm. Accordingly, Mr. Wolf has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Wolf does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Wolf is the Managing Principal of BSW Wealth Partners. You may contact him directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Debi C. Baydush

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Debi C. Baydush that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Debi C. Baydush is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Debi C. Baydush

Born: 1956

Education:

- Graduated with a Masters in International Economics from Johns Hopkins’ School of Advanced International Studies in 1980.
- Graduated with a B.A. in International Relations from the University of Pennsylvania in 1977.

Professional Designations:

- Series 65 securities license.

Employment History:

- Business Strategy/Principal with BSW Wealth Partners from January 2010 to present.
- Member/investment advisor representative with R3 Returns, LLC from April 2012 to January 2015.
- Chief Investment Officer/Managing Principal with Baydush Simon Weaver from January 2003 to December 2009.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Ms. Baydush is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of her ownership of BSW Wealth Partners. The recommendation by Ms. Baydush that any client seek investment advisory services from R3 presents a conflict of interest, as Ms. Baydush could have the incentive to make such a recommendation based on compensation to be received via Ms. Baydush’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Ms. Baydush’s total compensation is based, in part, on the amount of assets under management that Ms. Baydush introduces to the firm. Accordingly, Ms. Baydush has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client’s best interests.

Ms. Baydush does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Ms. Baydush is a Principal of BSW Wealth Partners. You may contact her directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Drew S. Simon

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Drew S. Simon that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Drew S. Simon is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Drew S. Simon

Born: 1954

Education:

- Graduated with a J.D. in Taxation from the Columbus School of Law in 1979.
- Graduated with a B.S. in Economics/Finance from Wharton School of Finance in 1976.

Professional Designations:

- Series 65 securities license.

Employment History:

- Financial Advisor/Principal with BSW Wealth Partners from January 2010 to present.

- Member/investment advisor representative with R3 Returns from April 2012 to January 2015.
- Financial Advisor/Managing Principal with Baydush Simon Weaver from January 2003 to December 2009.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Simon is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of his ownership of BSW Wealth Partners. The recommendation by Mr. Simon that any client seek investment advisory services from R3 presents a conflict of interest, as Mr. Simon could have the incentive to make such a recommendation based on compensation to be received via Mr. Simon’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Mr. Simon’s total compensation is based, in part, on the amount of assets under management that Mr. Simon introduces to the firm. Accordingly, Mr. Simon has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client’s best interests.

Mr. Simon does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Simon is a Principal of BSW Wealth Partners. You may contact him directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Elias Bachmann

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Elias Bachmann that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Elias Bachmann is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Elias Bachmann

Born: 1974

Education:

- Earned the right to use the Chartered Financial Analyst (CFA) designation in 2010.

The CFA designation is globally recognized and attests to a charter holder’s success in a rigorous and comprehensive study program in the field of investment management and research analysis. To receive the CFA designation a candidate must complete the required four years of professional work experience in addition to passing a series of three exams. Mr. Bachmann worked in the investment management industry since 2004. Finally, Mr. Bachmann agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFA designation.

- Graduated with an M.B.A. from the University of Colorado at Boulder in 2004.

- Graduated with a B.A. from the University of Colorado at Boulder in 1997.

Employment History:

- Director of Private Investments with BSW Wealth Partners from December 2015 to present.
- Senior Portfolio Manager with BSW Wealth Partners from October 2009 to November 2015.
- Financial Advisor and Financial Analyst with Wells Fargo Advisors from March 2004 to September 2009.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Bachmann does not have other business activities.

Item 5 – Additional Compensation

Mr. Bachmann's total compensation is based, in part, on the amount of assets under management that Mr. Bachmann introduces to the firm. Accordingly, Mr. Bachmann has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Bachmann does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Bachmann is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Mr. Bachmann, please contact David C. Wolf or Drew S. Simon at 303-444-9696.

Item 1 – Cover Page

Eric Davis

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Eric Davis that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Eric Davis is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Eric Davis

Born: 1988

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2017.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Mr. Davis has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Mr. Davis has been in the business since 2015. Finally, Mr. Davis has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with a B.S.B.A. in Finance from the Leeds School of Business at the University of Colorado in 2012.

Professional Designations:

- Series 65 securities license

Employment History:

- Financial Advisor with BSW Wealth Partners from January 2019 to present.
- Associate Advisor with BSW Wealth Partners from June 2015 to January 2019.
- Investment banking analyst with Petrie Partners from January 2013 to April 2013.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Davis does not have other business activities.

Item 5 – Additional Compensation

Mr. Davis's total compensation is based, in part, on the amount of assets under management that Mr. Davis introduces to the firm. Accordingly, Mr. Davis has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Davis does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Davis is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Mr. Davis, please contact Ralieg Riddoch or Tim Wojtalik at 303-444-9696.

Item 1 – Cover Page

Julia Wentworth

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405, Englewood, CO 80112

(303) 444-9696

April 18, 2019

This Brochure Supplement provides information about Julia Wentworth that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Julia Wentworth is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Julia Wentworth

Born: 1984

Education:

- Graduated with an M.B.A. from Leeds School of Business at University of Colorado in 2017.
- Graduated with a B.A. from University of Colorado in 2007.

Professional Designations:

- Series 65 securities license

Employment History:

- Associate Advisor with BSW Wealth Partners from April 2019 to present.

- Advisor, Associate Advisor, Operations Associate with Colorado Capital Management from April 2017 to March 2019.
- Internship with Forester's Financial from January 2017 to April 2017.
- Part-time Financial Planning Associate with Hinman Financial Planning, Inc. from September 2016 to March 2017.
- Part-time Business Development Associate with WashPark Capital from December 2016 to February 2017.
- Executive Assistant with Mental Health Partners from January 2015 to September 2016.
- Executive Assistant with Boulder County Public Health from June 2013 to January 2015.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Ms. Wentworth does not have other business activities.

Item 5 – Additional Compensation

Ms. Wentworth's total compensation is based, in part, on the amount of assets under management that Ms. Wentworth introduces to the firm. Accordingly, Ms. Wentworth has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Ms. Wentworth does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Ms. Wentworth is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Ms. Wentworth, please contact Julie Martinez or Tim Wojtalik at 303-444-9696.

Item 1 – Cover Page

Julie Martinez

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Julie Martinez that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Julie Martinez is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Julie Martinez

Born: 1970

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2006.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Ms. Martinez has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Ms. Martinez has been in the business since 1997. Finally, Ms. Martinez has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with a B.S. from Colorado State University in 1992.

Employment History:

- Principal with BSW Wealth Partners from January 2018 to present.
- Financial Advisor with BSW Wealth Partners from June 2015 to present.
- Financial Planner with Purple Wealth FKA KT Investment Advisors/ from September 2008 to June 2015. Registered Representative with LPL Financial from February 2012 to June 2015.
- Wealth Management Specialist with Wells Fargo Wealth Management Group from June 2006-September 2008
- Commercial Real Estate Manager/Financial Planning Associate with Kahler Financial Group from July 1997-June 2006

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Ms. Martinez is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of her ownership of BSW Wealth Partners. The recommendation by Ms. Martinez that any client seek investment advisory services from R3 presents a conflict of interest, as Ms. Martinez could have the incentive to make such a recommendation based on compensation to be received via Ms. Martinez’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Ms. Martinez’s total compensation is based, in part, on the amount of assets under management that Ms. Martinez introduces to the firm. Accordingly, Ms. Martinez has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client’s best interests.

Ms. Martinez does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Ms. Martinez is a Principal of BSW Wealth Partners. You may contact her directly or contact another Principal of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Kathrin Biscornet

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405, Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Kathrin Biscornet that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Kathrin Biscornet is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Kathrin Biscornet

Born: 1987

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2017.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Ms. Biscornet has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Ms. Biscornet has been in the business for over five years. Finally, Ms. Biscornet has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with a B.S. in Economics from University of Geneva in 2012.

Professional Designations:

- Series 65 securities license

Employment History:

- Financial Planner with BSW Wealth Partners from August 2018 to present.
- Associate Advisor with Diversified Asset Management, Inc. from February 2017 to July 2018.
- e-Banking Support Line Advisor with UBS in Switzerland from May 2008 to May 2010.
- Trainee with UBS in Switzerland from September 2006 to February 2008.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Ms. Biscornet does not have other business activities.

Item 5 – Additional Compensation

Ms. Biscornet's total compensation is based, in part, on the amount of assets under management that Ms. Biscornet introduces to the firm. Accordingly, Ms. Biscornet has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Ms. Biscornet does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Ms. Biscornet is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Ms. Biscornet, please contact Julie Martinez or Tim Wojtalik at 303-444-9696.

Item 1 – Cover Page

Lynda Gregory

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Lynda D. Gregory that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Lynda D. Gregory is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Lynda Gregory

Born: 1973

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2015.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Ms. Gregory has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Ms. Gregory has been in the business since 1999. Finally, Ms. Gregory has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with a B.S. in Kinesiology from the Kansas State University in 1995.

Employment History:

- Financial Advisor with BSW Wealth Partners from January 2018 to present.
- Associate Advisor (Independent Contractor) with BSW Wealth Partners from November 2017 to December 2017.
- VP - Financial Consultant with Charles Schwab & Co. from April 2004 to March 2017.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Ms. Gregory is a silent partner with Reefs To Rockies, LLC, a travel company.

Item 5 – Additional Compensation

Ms. Gregory's total compensation is based, in part, on the amount of assets under management that Ms. Gregory introduces to the firm. Accordingly, Ms. Gregory has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Ms. Gregory does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Ms. Gregory is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Ms. Gregory, please contact Ralieg Riddoch or Tim Wojtalik at 303-444-9696.

Item 1 – Cover Page

Matthew Samek

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Matthew Samek that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew Samek is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Matthew Samek

Born: 1984

Education:

- Graduated with a B.A. from the University of Colorado at Boulder in 2007.

Professional Designations:

- Series 65 securities license

Employment History:

- Chief Operations Officer/Principal with BSW Wealth Partners from September 2018 to present
- Director of Operations/Principal with BSW Wealth Partners from January 2016 to present.

- Portfolio Manager with BSW Wealth Partners from February 2012 to December 2015.
- Portfolio Mechanic with BSW Wealth Partners from January 2010 to February 2012.
- Portfolio Mechanic with Baydush Simon Weaver from January 2008 to January 2010.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Samek is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of his ownership of BSW Wealth Partners. The recommendation by Mr. Samek that any client seek investment advisory services from R3 presents a conflict of interest, as Mr. Samek could have the incentive to make such a recommendation based on compensation to be received via Mr. Samek’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Mr. Samek’s total compensation is based, in part, on the amount of assets under management that Mr. Samek introduces to the firm. Accordingly, Mr. Samek has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client’s best interests.

Mr. Samek does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Samek is a Principal of BSW Wealth Partners. You may contact him directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Ralieg D. Riddoch

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Ralieg D. Riddoch that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Ralieg D. Riddoch is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Ralieg D. Riddoch

Born: 1973

Education:

- Earned the right to use the Certified Divorce Financial Analysts® (CDFA™) designation in 2012.

The Certified Divorce Financial Analysts® designation is offered by The Institute for Divorce Financial Analysts (IDFA™) which is a national organization dedicated to the certification, education and promotion of the use of financial professionals in the divorce arena.

To secure the right to use the CDFA™ mark, Mr. Riddoch has completed an educational program and passed a series of four examinations. Additionally, the (IDFA™) requires each candidate to be currently working in the financial services, accounting, or family law profession and have three years of experience in the financial services, accounting, or family law profession. Mr. Riddoch is

also required to maintain the designation by completing continuing education requirements.

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2007.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Mr. Riddoch has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Mr. Riddoch has been in the business since 1998. Finally, Mr. Riddoch has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with a B.S. in Finance from the University of Northern Colorado in 1997.

Employment History:

- Financial Advisor/ Principal with BSW Wealth Partners from January 2014 to present.
- Financial Advisor with BSW Wealth Partners from January 2010 to December 2013.
- Financial Advisor and Planning Associate with Baydush Simon Weaver from July 2005 to December 2009.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Riddoch is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of his ownership of BSW Wealth Partners. The recommendation by Mr. Riddoch that any client seek investment advisory services from R3 presents a conflict of interest, as Mr. Riddoch could have the incentive to make such a recommendation based on compensation to be received via Mr. Riddoch’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Mr. Riddoch's total compensation is based, in part, on the amount of assets under management that Mr. Riddoch introduces to the firm. Accordingly, Mr. Riddoch has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Riddoch does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Riddoch is a Principal of BSW Wealth Partners. You may contact him directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Samuel Napp

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Samuel Napp that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Samuel Napp is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Samuel Napp

Born: 1983

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2012.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Mr. Napp has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Mr. Napp has been in the business since 2007. Finally, Mr. Napp has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Earned the right to use the Certified Public Accountant Designation (CPA®) in 2009.

A CPA® is a Certified Public Accountant. CPA® candidates must pass the Uniform CPA® Examination to qualify for a CPA® certificate and license to practice public accounting. While the exam is the same regardless of where it is taken, every state/jurisdiction has its own set of education and experience requirements that individuals must meet. However, most states require at least a bachelor's degree and a concentration in accounting, and at least one year of public accounting experience under the supervision of or verification by a CPA®. Once the designation is attained, the CPA® is required to meet continuing education requirements.

- Graduated with a B.S.B.A. in Accounting from the Leeds School of Business at the University of Colorado and a B.S. in Integrated Physiology from the School of Arts and Sciences at the University of Colorado in 2007.

Employment History:

- Financial Advisor with BSW Wealth Partners from January 2016 to present.
- Financial Planning Associate with BSW Wealth Partners from June 2012 to January 2016.
- Certified Public Accountant at Brock and Company CPA's from December 2009 to June 2012
- Senior Accountant at KPMG LLP from September 2007 to December 2009

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Napp does not have other business activities.

Item 5 – Additional Compensation

Mr. Napp's total compensation is based, in part, on the amount of assets under management that Mr. Napp introduces to the firm. Accordingly, Mr. Napp has a conflict of interest for recommending the firm to clients for investment advisory services, as the

recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Napp does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Napp is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Mr. Napp, please contact Benjamin R. Weaver or Ralieg D. Riddoch at 303-444-9696.

Item 1 – Cover Page

Timothy Wojtalik

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
383 Inverness Pkwy Ste. 405 Englewood, CO 80112

(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Timothy Wojtalik that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy Wojtalik is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Timothy Wojtalik

Born: 1969

Education:

- Earned the right to use the Certified Financial Planner Designation (CFP®) in 2006.

The CFP® mark is a professional designation granted by the Certified Financial Planner Board of Standards, Inc. To secure the right to use the CFP® mark, Mr. Wojtalik has completed an educational program and passed a series of six examinations. In addition, to receive the CFP® certification, a candidate must have at least three years of planning experience. Mr. Wojtalik has been in the business since 2000. Finally, Mr. Wojtalik has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFP designation.

- Graduated with an M.B.A. from the University of Denver in 1997.

- Graduated with a B.A. from the University of Michigan in 1991.

Employment History:

- Financial Advisor/Principal with BSW Wealth Partners from January 2016 to present.
- Financial Advisor with BSW Wealth Partners from January 2010 to 2015.
- Financial Advisor and Planning Associate with Baydush Simon Weaver from April 2007 to December 2009.
- Financial Advisor/Owner of Harvest Wealth Management from June 2006 to April 2007.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Wojtalik is a partial owner of R3 Returns, LLC (“R3”), an affiliated SEC-registered investment advisory firm, by virtue of his ownership of BSW Wealth Partners. The recommendation by Mr. Wojtalik that any client seek investment advisory services from R3 presents a conflict of interest, as Mr. Wojtalik could have the incentive to make such a recommendation based on compensation to be received via Mr. Wojtalik’s ownership interest, rather than basing such recommendation on a particular client’s need. Clients are reminded that they are not under any obligation to pursue investment advisory services from R3.

Item 5 – Additional Compensation

Mr. Wojtalik’s total compensation is based, in part, on the amount of assets under management that Mr. Wojtalik introduces to the firm. Accordingly, Mr. Wojtalik has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client’s best interests.

Mr. Wojtalik does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Wojtalik is a Principal of BSW Wealth Partners. You may contact him directly or contact other Principals of BSW Wealth Partners at 303-444-9696.

Item 1 – Cover Page

Yiwen Chen

BSW Wealth Partners

2336 Pearl Street, Boulder, CO 80302
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(303) 444-9696

March 29, 2019

This Brochure Supplement provides information about Yiwen Chen that supplements the BSW Wealth Partners, Inc., a Public Benefit Corporation Brochure (“BSW Wealth Partners”). You should have received a copy of that brochure. Please contact our office at 303-444-9696 if you did not receive the BSW Wealth Partners Brochure or if you have any questions about the contents of this supplement.

Additional information about Yiwen Chen is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Yiwen Chen

Born: 1989

Education:

- Earned the right to use the Chartered Financial Analyst (CFA) designation in 2016.

The CFA designation is globally recognized and attests to a charter holder’s success in a rigorous and comprehensive study program in the field of investment management and research analysis. To receive the CFA designation a candidate must complete the required four years of professional work experience in addition to passing a series of three exams. Mr. Chen has worked in the investment management industry since 2012. Finally, Mr. Chen has agreed to be bound by a strict Code of Ethics and to complete required continuing education to maintain the CFA designation.

- Graduated with a B.S.B.A. in Finance from the Leeds School of Business at the University of Colorado in 2011.

Employment History:

- Portfolio Manager with BSW Wealth Partners from July 2014 to present.
- Portfolio Mechanic and Reporting Specialist with BSW Wealth Partners from January 2012 to July 2014.

Item 3 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this item.

Item 4 – Other Business Activities

Mr. Chen does not have other business activities.

Item 5 – Additional Compensation

Mr. Chen's total compensation is based, in part, on the amount of assets under management that Mr. Chen introduces to the firm. Accordingly, Mr. Chen has a conflict of interest for recommending the firm to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

Mr. Chen does not receive compensation from any third party for providing investment advice.

Item 6 – Supervision

Mr. Chen is supervised by Principals of BSW Wealth Partners. One-on-one reviews are held no less than monthly to discuss individual client/business related items/advice.

If you need to contact a Principal of BSW Wealth Partners regarding Mr. Chen, please contact Ralieg Riddoch or Matt Samek at 303-444-9696.

NOTICE

BSW Wealth Partners is committed to preserving the confidentiality of your personal and financial information. As part of this commitment, we have adopted this Privacy Policy regarding the collection and disclosure of nonpublic information provided to us by Clients and prospective Clients.

This notice explains our policies and procedures regarding the collection, access and safeguarding of such nonpublic personal information, as required by the Gramm-Leach-Bliley Act of 1999 and Securities and Exchange Commission regulations.

PRIVACY POLICY

Information Collected

As we work together to achieve your financial and investment goals, you will often share with us certain personal and financial information. This information might include, for example, your name, address and telephone number, your email address, information regarding your investment accounts, your banking arrangements, information on family members, and your social security number. We collect this information in order to properly handle your account and provide you with advisory services. We consider protecting your personal and financial information a vital part of our job.

Access to Information

Our personnel have limited access to your personal and financial data based on their job functions. All of our personnel are instructed to comply with confidentiality rules designed to protect your personal and financial information. In addition, all personnel have signed Confidentiality Agreements with our firm. If we determine that our personnel have failed to follow these rules and procedures, they will be subject to disciplinary action.

Use and Disclosure of Information

We may use your personal and financial information in order to provide you with the investment and financial advisory services you request, to improve our services, make our procedures more efficient, implement security measures, and fight fraud. Furthermore, we may share relevant portions of this information with selected outside professionals approved in advance by you. Such outside professionals might include your CPA, attorney, banker, insurance agent, or mortgage company.

We will not sell your personal and financial information to any outside party. We will not sell or disclose our mailing or client lists to other businesses so they can offer and sell you goods and services.

We use custodians, transfer agents and other third party businesses, such as *Charles Schwab*, *TD Ameritrade*, etc., to process initial account set up, investment transactions, redemptions, shares transfers, and other transactions that you may request. We may disclose relevant portions of the personal and financial information that you provide to us with these other businesses to accomplish these functions. We obtain from these businesses confidentiality agreements that prohibit them from selling or improperly using your personal or financial information.

On occasion, we may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required or permitted under law, for example to cooperate with securities regulations or law enforcement authorities, resolve consumer disputes, or perform credit/authentication checks.

In addition, we may make other disclosures to non-affiliated third parties as permitted by law. For example, we may disclose your non-public personal information to law enforcement agencies or computer security consultants for the purpose of protecting against fraud and unauthorized transactions or in order to maintain the confidentiality of our records. We may also disclose your non-public personal information to our attorneys and accountants. Outside of these exceptions, we will not share your personal information with third parties unless you have specifically asked us to do so.

If you have any questions or concerns regarding these procedures, please contact us at 303.444.9696.