ITEM 1 – COVER PAGE

Horizon Wealth Investment Solutions LLC
doing business as Horizon Wealth, Vision Wealth, and HW Tax Strategies



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Denver, CO 80246

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https://myhorizonwealth.com/

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Monmouth, OR 97361

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Form ADV Part 2A Brochure

October 21, 2026

This brochure provides information about the qualifications and business practices of Horizon Wealth Investment Solutions LLC, which does business as Horizon Wealth, Vision Wealth, and HW Tax Strategies, in certain markets ("Firm" or "Adviser"). If you have any questions about the contents of this brochure, please contact us at (303) 777-7124. 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. Horizon Wealth is a Registered Investment Advisor. Registration as an Investment Advisor with the SEC or any state securities authority does not imply a certain level of skill or training.

Additional information about Adviser is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as an IARD number. The IARD number for Horizon Wealth Investment Solutions LLC is CRD #333752.

ITEM 2 - MATERIAL CHANGES

MATERIAL CHANGES SINCE THE LAST ANNUAL UPDATE

Horizon Wealth Investment Solutions LLC was established as a new Registered Investment Advisor in November 2024 with the states of Colorado and Missouri. The Firm transitioned to an SEC registered firm in November 2025 and adheres to the rules and regulations of the Advisor's Act of 1940. Horizon Wealth will provide updates to this document annually within 120 days of the close of the fiscal year, or more frequently in the event of material changes.

The following material changes have occurred since our last annual amendment filing from October 21, 2026:

No material changes.

ANNUAL UPDATE

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure. Each year, we will ensure that you receive a summary of any material changes to this and subsequent brochures by April 30th. We will further provide you with our most recent brochure at any time at your request, without charge. You may request a brochure by contacting us at (303) 777-7124.

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ITEM 4 - ADVISORY BUSINESS

Horizon Wealth Investment Solutions LLC, which does business as Horizon Wealth, Vision Wealth and HW Tax Strategies, in certain markets, offers investment management and financial planning services. We specialize in retirement investing, income replacement strategies, and financial independence. Our services are tailored to meet the specific needs of our clients, and we offer both discretionary and non-discretionary management.

This disclosure document is being offered to you by Horizon Wealth Investment Solutions LLC about the investment advisory services we provide. It discloses information about our services and the way those services are made available to you, the client.

We are an investment management firm located in Colorado, Oregon and Virgina. Daniel Blair and Melissa Blair are the Managing Members of the firm. Daniel Blair serves as the firm's Chief Compliance Officer.

We are dedicated to assisting clients to build, grow, manage, and safeguard their wealth. Our aim is to offer guidance that enables clients to realize their financial objectives effectively. Specializing in investment for financial independence, which includes retirement investing and income replacement strategies. We tailor our services to meet your specific needs. We offer an initial complimentary meeting upon our discretion; however, our investment advisory services commence only after you and Adviser execute an Investment Management Agreement ("Advisory Agreement") or Financial Planning Agreement, ensuring a clear and mutual understanding of our partnership.

INVESTMENT MANAGEMENT SERVICES

Before we enter an Adviser-Client relationship, we may offer a complimentary general consultation to discuss services available, give a prospective client time to review services desired, and determine whether a relationship might benefit the client. Investment advisory services begin only after we and the client formalize the relationship with a properly executed Advisory Agreement. For accounts that engage in the Firm's investment management services, we advise advisory accounts on a discretionary and non-discretionary basis. Once we have determined a profile and investment plan with a client, we will execute the day-to-day transactions without seeking prior client consent but within the expected investment guidelines discussed with the client. Account supervision is guided by the client's written profile and investment plan.

We primarily allocate client assets among various equities, Exchanged Traded Funds ("ETFs"), cash, no-load or load-waived mutual funds in accordance with their stated investment objectives. If appropriate, and in accordance with client objectives, we may recommend private investments, private real estate investment trust REITS, and alternatives. These are considered asset allocation categories for the client's investment strategy.

If a non-discretionary relationship is in place, calls will be placed presenting the recommendations made and only upon your authorization will any action be taken on your behalf.

During personal discussions with clients, we determine the client's objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review a client's prior investment history, as well as family composition and background. Based on client needs, we develop a client's personal profile and investment plan. We then create and manage the client's investments based on that agreed upon financial plan. It is the client's obligation to notify us immediately if circumstances have changed with respect to their goals. Once we have determined the types of investments to be included in a client's portfolio and have allocated the assets, we provide ongoing investment review and management services.

USE OF MODEL MANAGERS/THIRD PARTY MONEY MANAGERS AND PLATFORM PROVIDERS

Our Firm may offer in-house portfolio recommendations, or we may utilize certain platform provider(s) and their associated third-party money managers ("TPMM") to aid in the implementation of investment strategies for your portfolio. In certain circumstances, we may allocate a portion of a portfolio to an independent TPMM for separate account management based upon your individual circumstances and objectives, including, but not limited to, your account size and tax circumstances. Upon the recognition of such situations, in coordination with you, Adviser will hire a Manager for the management of those assets. These managers shall assist our Firm in managing the day-to-day investment operations of the various allocations. In addition, the TPMM shall determine the composition of the investments comprising the allocation, what securities and other assets of the allocation will be acquired, held, disposed of or loaned in conformity with the written investment objectives, policies and restrictions and other

statements of each client comprising the allocation, or as instructed by our Firm. Managers may take discretionary authority to determine the securities to be purchased and sold for the client.

Adviser has access to the platform providers reporting systems, client relationship management systems and workflow systems to utilize their technology platforms to support data reconciliation, performance reporting, fee calculation and billing, research, client database maintenance, quarterly performance evaluations, payable reports, models, trading platforms, and other functions related to the administrative tasks of managing client accounts. Due to this arrangement, the platform provider will have access to client information, but the platform provider will not serve as an investment advisor to the Firm's Clients. Adviser and the platform providers are non-affiliated companies. Platform providers charge the Firm an annual fee for each account administered by the platform provider. Refer to Item 5, of this brochure, regarding compensation of the platform provider programs. Clients receive continuous investment advice based on investment objectives, risk profile and time-horizon. While investment strategies and recommendations are tailored to the individual needs of each client, they consist of an asset allocation consistent as outlined in Item 8 of this Brochure. Your Advisory Agreement with Adviser will include the authorization to utilize TPMMs and to replace (i.e., hire and fire) Managers on a discretionary basis.

We will not enter into an investment advisor relationship with a prospective client whose investment objectives are considered incompatible with the Firm's investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines. However, Clients may have the ability to impose reasonable restrictions on the management of their accounts, including the ability to instruct the Firm not to purchase certain securities subject to the approval of the Firm and any TPMMs.

We do have limited authority to direct the custodian to deduct the Firm's investment advisory fees from accounts, but only with the appropriate written authorization from clients.

Clients may engage us to advise on certain investment products that are not maintained at the Firm's recommended custodian, such as life insurance, annuity contracts, and assets held in employer sponsored retirement plans. Where appropriate, we provide advice about any type of held away account that is part of a client portfolio.

Clients are advised and are expected to understand that the Firm's past performance is not a guarantee of future results. Certain market and economic risks exist that adversely affect an account's performance. This could result in capital losses in Client accounts.

We review the performance of the TPMMs on at least an annual basis. More frequent reviews may be triggered by changes in Manager's management, performance or geopolitical and macroeconomic specific events.

FINANCIAL PLANNING SERVICES

Financial planning services are included as part of our investment management services, however, upon request, the Firm offers standalone financial planning for a separate engagement and separate fee. Through the financial planning process, our team strives to engage our clients in conversations around the family's goals, objectives, priorities, vision, and legacy – both for the near term as well as for future generations. With the unique goals and circumstances of each family in mind, our team will offer financial planning ideas and strategies to address the client's holistic financial picture, including estate, income tax (Adviser is not a tax services Firm and you should always consult a tax professional), charitable, cash flow, wealth transfer, and family legacy objectives. Our team partners with our client's other advisors (CPAs, Enrolled Agents, Estate Attorneys, Insurance Brokers, etc.) to ensure a coordinated effort of all parties toward the client's stated goals. Such services include various reports on specific goals and objectives or general investment and/or planning recommendations, guidance to outside assets, and periodic updates.

Our specific services in preparing your plan may include:

> **PERSONAL:** We can review family records, budgeting, personal liability, estate information and financial goals.
>
> **TAX & CASH FLOW:** We can analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax

and future tax liability. Keep in mind, Adviser is not a tax services firm and clients should consult a tax professional for specific tax questions and advice.

INVESTMENTS: We can analyze investment alternatives and their effect on the client's portfolio.

INSURANCE: We can review existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home and automobiles.

RETIREMENT: We can analyze current strategies and investment plans to help the client achieve his or her retirement goals.

DEATH & DISABILITY: We can review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.

ESTATE: Our firm may utilize outside estate professionals that are appropriately licensed and can assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

TAX DEFERRAL: Our firm may utilize the services of the Estate Planning Team (EPT) organization. Through this entity the Firm has access to independent tax and legal professionals with the expertise to present capital gains tax deferral solutions. Adviser pays a monthly membership fee for access to this organization and makes these services available to all clients engaged with Adviser financial planning services for no additional fee.

CONSULTING SERVICES

We also provide clients with investment advice on a more-limited basis on one or more isolated areas of concern such as estate planning, tax strategies, real estate, retirement planning, or any other specific topic. Additionally, we provide advice on non-securities matters about the rendering of estate planning, insurance, real estate, and/or annuity advice or any other business advisory / consulting services for equity or debt investments in privately held businesses. In these cases, clients will be required to select their own investment managers, custodian, and/or insurance companies for the implementation of consulting recommendations. If client needs include brokerage and/or other financial services, we will recommend the use of one of several investment managers, brokers, banks, custodians, insurance companies, or other financial professionals ("Firms"). Consulting clients must independently evaluate these Firms before opening an account or transacting business and have the right to effect business through any firm they choose. Clients have the right to choose whether or not to follow the consulting advice provided.

Unmanaged Assets: From time to time, a Client may decide to hold certain securities or other property for which our Firm does not provide investment advisory services ("Unmanaged Assets") in the account(s) held at the Custodian or outside the Custodian. Requests to hold an Unmanaged Asset must be made in writing and require the approval of our Firm. Our Firm will have no duty, responsibility or liability whatsoever with respect to these assets, and therefore, our Firm will not charge an investment advisory fee. However, if you have an account that solely contains Unmanaged Assets, the Custodian may charge an account maintenance fee as disclosed in the Custodian account paperwork executed by the Client. In all cases, it is the client's sole responsibility to monitor, manage, and transact all Unmanaged Assets (securities and/or accounts).

DISCLOSURE REGARDING ROLLOVER RECOMMENDATIONS

When a client or prospect leaves an employer, they typically have five options regarding their existing retirement plan: (i) leave the money in the former employer's plan, if permitted; (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted; (iii) rollover to a brokerage (self-directed) Individual Retirement Account ("IRA"); (iv) roll over the assets to an advisory IRA; or (v) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). Clients contemplating rolling over retirement funds to an IRA for us to manage are encouraged to first speak with their CPA or tax attorney.

There is an inherent financial incentive for your IAR to recommend that you roll over your assets into one or more accounts, because the enrollment will generate compensation based on the increase in your IAR's total assets under management. We address these financial compensation conflicts by including the disclosure of the conflicts in this brochure and by requiring your IAR to recommend investment advisory programs, investment securities, and services that are in the best interest of each client based upon the client's investment objectives, risk tolerance, financial situation, and cost. As fiduciaries , we have to act in your best interest and not put our interest ahead of yours. At the same time, the way Adviser makes money creates some conflicts with your interests. Clients are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if the client does complete the rollover, the client is under no obligation to have the assets in an account managed by us.

WRAP FEE PROGRAM

A wrap fee program is an arrangement where brokerage commissions and transaction costs are absorbed by the Firm. In a wrap fee program, the investment advisory fee that the client pays covers transaction costs and commissions resulting from the management of your accounts. Adviser offers both wrap and non-wrap investment options. To ensure recommendations are in the client's best interest, Adviser has entered into an arrangement with Impact Partnership Wealth ("IPW"), an unaffiliated registered investment advisor, which offers a proprietary portfolio solution, Market Guard. Market Guard is only available through IPW's platform. All IPW offerings are available on a wrap fee program only, including Market Guard. Adviser offers Market Guard to clients, when suitable. Only clients that utilize Market Guard's offering will participate in the wrap fee program. All other investment recommendations offered by Adviser will not be included as part of the wrap fee program. Adviser ensures all portfolio recommendations are suitable for each client. Adviser discusses all portfolio options and the associated fees with clients prior to executing a client agreement. It is important to note, however, that most investments trade without transaction fees today, so the firm's payment of transaction costs and other incidental custodial related expenses should not be considered a significant factor in determining the relative value of the wrap program. This wrap fee program is only available for clients who wish to utilize the firm's Market Guard investment sleeve as offered through IPW. Participants in the program may pay a higher aggregate fee than if brokerage services are purchased separately. Additional information about the Program is available in Horizon Wealth's Wrap Brochure, which appears as Part 2A Appendix 1 of the Firm's Form ADV.

Please note: When managing a client's account on a wrap fee basis, the Platform provider shall receive, as payment for its investment advisory services, the balance of the wrap fee after all other costs incorporated into the wrap fee have been deducted. In as much as the execution costs for transactions effected in the client account will be paid by the Platform Provider, a potential conflict of interest arises in that the Platform Provider has a potential disincentive to trade securities in the client account. In addition, the amount of compensation received by the Platform Provider as a result of the client's participation in the Program may be more than what the Platform Provider would receive if the client paid separately for investment management and transaction fees.

ASSETS

As of December 31, 2025, the firm has $147,239,402 of regulatory assets under management. Of those assets, $147,239,402 are discretionary assets under management. Of those assets, $0 are non-discretionary assets under management.

ITEM 5 - FEES AND COMPENSATION

INVESTMENT MANAGEMENT & FINANCIAL PLANNING SERVICES

The Firm provides discretionary and non-discretionary investment advisory services on a negotiable fee basis. Fees are billed monthly, in arrears, based on the average daily balance of the account(s). Fees are assessed on all assets under management, including securities, cash and money market balances. That "cash" will be included in the AUM fee. Cash held in other types of accounts, such as a stand-alone money market, a "contribution distribution sleeve" or "non-managed" account (used for purposes of scheduled distributions or flexibility of withdrawals) is *not* included in the fee. Clients of Horizon Wealth, who utilize Market Guard's proprietary solutions are billed an all-in, wrap program fee which includes transaction fees, should they occur. The following fees are included as part of the annual advisory fee.

- Adviser investment advisory fee
- Platform provider "platform fee", if applicable
- Model manager fee, if applicable

- ETF strategist fee, if applicable
- Transaction fee, Only for Wrap Program Accounts (Market Guard)

The advisory services may be terminated by the client within five (5) business days of signing the Advisory Agreement without penalty or incurring any advisory fees. After five days, Adviser or the client may terminate the Advisory Agreement upon written notice to the other party. The management fee will be pro-rated to the date of termination. Upon termination, the client is responsible for monitoring the securities in your account, and we will have no further obligation to act or advise with respect to those assets.

Fees typically range between 1.00% and 1.75%. While fees may be individually negotiated, annually, all-in portfolio management fees will not exceed 2.00%. This applies to both wrap and non-wrap accounts. This fee will be defined in the Advisory Agreement. The platform provider will debit the client account directly for the advisory fee and pay a portion of the fee to Horizon Wealth. Clients provide written authorization permitting the fees to be paid directly from the account held by the qualified custodian. Further, the qualified custodian agrees to deliver an account statement to the client on a monthly basis indicating all the amounts deducted from the account including our advisory fees.

To calculate billing Adviser assumes a 365-day year and months lasting 30 days. Calculations are as follows:

Average Daily Balance x (Fee/10,000) / # of Days in a year x # of Invested Days in a Month

As part of this process, the client is made aware of the following:

a) You provide written authorization permitting us to be paid directly from the managed account held by the independent custodian;

b) Our firm sends an electronic request to the custodian indicating the amount of the fee to be paid from the client's managed account;

c) Your independent custodian offers statements at least monthly to you showing the market values for each security included in the Assets and all disbursements in your account including the amount of the advisory fees paid to us.

Although Adviser has established a maximum annual fee as stated above, we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These factors include the complexity of the client, assets to be placed under management, anticipated future additional assets, related accounts, portfolio style, account composition, reports, among others.

In no case are our fees based on, or related to, the performance of your funds or investments.

Relative Cost of Wrap Fee Program: The cost of the wrap fee program could be more or less than purchasing investment advice and custody/brokerage services separately. Factors influencing the relative cost include the cost of investment advice, custody and brokerage services if purchased separately, the types of investments held in the account, and the frequency, type, and size of trades in the account.

FINANCIAL PLANNING FEES

For clients engaged with the firm for investment advisory services, financial planning services are included for no additional fee. For clients who wish to engage the firm in financial planning services only, the Firm offers stand-alone financial planning. Fees may vary based on the extent and complexity of your individual or family circumstances and the amount of your assets under our management. Our fee will be agreed in advance of services performed. The fee will be determined based on factors including the complexity of your financial situation, agreed upon deliverables, and whether you intend to implement any recommendations through Horizon Wealth. Stand-alone financial planning fees are fixed and range from $1,000 to $75,000. 50% of financial planning fees are due upon execution of the financial planning agreement, and the remainder is due upon delivery of the plan.

Typically, we complete a plan within a month and will present it to you within 90 days of the contract date, if you have provided us all information needed to prepare the financial plan.

Financial planning fees will be invoiced and paid via check to Adviser Investment Solutions, LLC.

The financial services may be terminated by the client within five (5) business days of signing the agreement without penalty or incurring any advisory fees. After five days, Adviser or the client may terminate the management agreement upon written notice to the other party. If you choose to terminate the financial planning agreement by providing us with written notice. Upon termination, fees will be prorated to the date of termination and any earned portion of the fee will be billed to you based on the hours that our firm has spent on creating your financial plan prior to termination.

We will not require prepayment of more than $1,200 in fees per client, six (6) or more months in advance of providing any services. In no case are our fees based on, or related to, the performance of your funds or investments.

CONSULTING SERVICES FEES

Adviser provides consulting services for clients who need advice on a limited scope of work. Adviser will negotiate consulting fees with you. Fees may vary based on the extent and complexity of the consulting project. You will be billed monthly as services are rendered. You should be aware that lower fees for comparable services may be available from other sources.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

OTHER ADDITIONAL FEES

For Wrap Fee Program Accounts: In addition to the Wrap Fee paid to Horizon Wealth, clients may also incur certain charges imposed by other third parties, trust companies, holding fees, banks and other financial institutions (collectively "Financial Institutions"). These additional charges may include fees charged by the margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap program fee that is charged by the Firm.

For Non-Wrap Program Accounts: In a non-wrap account, the client pays transaction fees, should they occur. Some clients may pay additional fees based on alternative investment strategies. All fees are disclosed within each PPM or associated risk document. In addition to the advisory fee, clients may also incur certain charges imposed by other third parties, trust companies, holding fees, banks and other financial institutions (collectively "Financial Institutions"). These additional charges may include fees charged by the margin costs, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, transfer taxes, wire transfer and electronic fund fees, and taxes on brokerage accounts and securities transactions.

Mutual Fund Fees: Mutual funds often offer multiple share classes with differing internal fee and expense structures. Adviser endeavors to identify and utilize the share class with the lowest internal fee and expense structure for each mutual fund. However, instances occur in which the lowest cost share class is not used.

These instances include but are not limited to: Instances in which a certain custodian has a share class available that has a lower internal fee and expense structure than is available for the same mutual fund at other custodians. In such instances, Adviser or their TPMM will select the lowest cost share class available at the custodian that holds your account even though a lower cost share class is available at another custodian. Instances in which the custodian that holds your account offers others a share class with a lower internal fee and expense structure than what is available to Adviser at the same custodian. In such instances, Adviser or their TPMM will select the lowest cost share class that the custodian makes available. This situation sometimes occurs because the custodian places

conditions on the availability of the lower cost share class that Adviser or their TPMM has determined are not appropriate to accept due to additional costs imposed by said conditions. Instances in which a share class with a lower internal fee and expense structure becomes available after the share class you hold was purchased. Adviser or their TPMM periodically monitors this circumstance. However, a share class with a lower internal fee may become available between the time of your purchase and Horizon Wealth's next review. Instances in which a share class with a lower internal fee and expense structure than the share class you currently hold is available at your custodian, but where Adviser or their third-party money manager is prevented by either the custodian or the fund sponsor from converting to the lower cost share class. Additionally, Adviser or their TPMM does not convert to a share class with a lower internal fee and expense structure if the conversion will cause other expense/costs to you that negates the advantage of the lower cost share class.

Non-Transaction Fee (NTF) Mutual Funds When selecting investments for our clients' portfolios we might choose mutual funds on your account custodian's Non-Transaction Fee (NTF) list. This means that your account custodian will not charge a transaction fee or commission associated with the purchase or sale of the mutual fund. The mutual fund companies that choose to participate in your custodian's NTF fund program pay a fee to be included in the NTF program. The fee that a mutual fund company pays to participate in the program is ultimately borne by the owners of the mutual fund including clients of our Firm. When we decide whether to choose a fund from your custodian's NTF list or not, we consider our expected holding period of the fund, the position size and the expense ratio of the fund versus alternative funds. Depending on our analysis and future events, NTF funds might not always be in your best interest.

Regulatory Fees To facilitate the execution of trades, regulatory Trading Activity Fees (TAF) are added to applicable sales transactions. The SEC regulatory fee is assessed on client accounts for sell transactions, and a FINRA fee is assessed on client accounts for sell transactions, for certain covered securities. This fee is not charged by our Firm but is accessed and collected by the custodian. The custodian that our Firm uses, is a FINRA member firm. These fees recover the costs incurred by the SEC and FINRA, for supervising and regulating the securities markets and securities professionals. The fee rates vary depending on the type of transaction and the size of that transaction. For more information on the SEC and FINRA fees, please visit their websites: www.sec.gov/fast-answers/answerssec31htm.html ***or*** www.finra.org/industry/trading-activity-fee.

Broker Dealer Commissions *Some firm* offerings are available only through a broker-dealer and are not sold by the firm. A supervised person of the firm is a registered representative of Emerson Equity, an unaffiliated broker-dealer, and receives commissions for selling these offerings in that separate capacity. This creates a conflict of interest. Clients are under no obligation to purchase through Emerson Equity or any supervised person. See investment PPM or subscription agreement for more details. See Item 8 below for more information.

ITEM 6- PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Adviser does not engage in performance-based fees. No supervised person is compensated by performance-based fees. Performance-based fees may create an incentive for the advisor to recommend an investment that may carry a higher degree of risk.

ITEM 7 - TYPES OF CLIENTS

Adviser works with the following types of clients: individuals, high net-worth individuals, trusts, and corporations.

Our Firm does impose an account minimum of $1,000,000 to initiate advisory and asset management services, however, this can be waived upon the discretion of the firm.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Our firm operates with a fiduciary approach to financial planning, structured to always act in the best interest of our clients. We uphold the highest fiduciary standard, providing comprehensive wealth management. With a strong

focus on strategic income planning, we offer a robust platform that includes traditional investment strategies, blended with trend identification and alternative investments, tailored to meet diverse client needs. At the core of our services are advanced tax deferral, mitigation, and reduction strategies, helping clients maximize their financial potential. As a boutique firm, we leverage strategic alliances to offer a full spectrum of wealth management and strategic tax strategies, ensuring truly personalized and holistic financial solutions.

METHODS OF ANALYSIS

While there may be some similarities in the portfolios created by our Firm, we understand that every client has their own unique planning needs. We have the ability and flexibility to create portfolios to help our client achieve their goals. We may utilize the following forms of analysis:

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Quantitative Analysis: We use mathematical ratios and other performance appraisal methods in an attempt to obtain more accurate measurements of a model manager's investment acumen, idea generation, consistency of purpose and overall ability to outperform their stated benchmark throughout a full market cycle. Additionally, we perform periodic measurements to assess the authenticity of returns. A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Technical Analysis: We use this method of evaluating securities by analyzing statistics generated by market activity, such as past prices and volume. Technical analysts do not attempt to measure a security's intrinsic value, but instead use charts and other tools to identify patterns that can suggest future activity. Technical analysts believe that the historical performance of stocks and markets are indications of future performance. Technical analysis is even more subjective than fundamental analysis in that it relies on proper interpretation of a given security's price and trading volume data. A decision might be made based on a historical move in a certain direction that was accompanied by heavy volume; however, that heavy volume may only be heavy relative to past volume for the security in question, but not compared to the future trading volume. Therefore, there is the risk of a trading decision being made incorrectly, since future trading volume is unknown. Technical analysis is also done through observation of various market sentiment readings, many of which are quantitative. Market sentiment gauges the relative degree of bullishness and bearishness in a given security, and a contrarian investor utilizes such sentiment advantageously. When most traders are bullish, then there are very few traders left in a position to buy the security in question, so it becomes advantageous to sell it ahead of the crowd. When most traders are bearish, then there are very few traders left in a position to sell the security in question, so it becomes advantageous to buy it ahead of the crowd. The risk in utilization of such sentiment technical measures is that a very bullish reading can always become more bullish, resulting in lost opportunity if the money manager chooses to act upon the bullish signal by selling out of a position. The reverse is also true in that a bearish reading of sentiment can always become more bearish, which may result in a premature purchase of a security.

Asset Allocation: Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance. A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

INVESTMENT STRATEGIES

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account(s). Adviser shall rely on the financial and other information provided by the Client or

their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform Adviser of any changes in financial condition, goals or other factors that may affect this analysis.

RISK OF LOSS

A client's investment portfolio is affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic conditions, changes in laws and national and international political circumstances.

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Adviser will assist Clients in determining an appropriate strategy based on their tolerance for risk.

Our methods rely on the assumption that the underlying companies within our security allocations are accurately reviewed by the rating agencies and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investors should be aware that accounts are subject to the following risks:

MARKET RISK - Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money and your investment may be worth more or less upon liquidation.

CYBERSECURITY RISK - In addition to the Material Investment Risks listed above, investing involves various operational and "cybersecurity" risks. These risks include both intentional and unintentional events at our Firm or one of its third-party counterparties or service providers, that may result in a loss or corruption of data, result in the unauthorized release or other misuse of confidential information, and generally compromise our firm's ability to conduct its business. A cybersecurity breach may also result in a third-party obtaining unauthorized access to our clients' information, including social security numbers, home addresses, account numbers, account balances, and account holdings. Our Firm has established business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches. However, there are inherent limitations in these plans and systems, including that certain risks may not have been identified, in large part because different or unknown threats may emerge in the future. As such, there is no guarantee that such efforts will succeed, especially because our Firm does not directly control the cybersecurity systems of our third-party service providers. There is also a risk that cybersecurity breaches may not be detected.

FOREIGN SECURITIES AND CURRENCY RISK - Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

CAPITALIZATION RISK - Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services. These stocks have historically been more volatile than the stocks of larger, more established companies.

INTEREST RATE RISK - In a rising rate environment, the value of fixed-income securities generally declines, and the value of equity securities may be adversely affected.

CREDIT RISK - Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and thus, impact the fund's performance.

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.

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 method 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.

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.

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.

SECURITIES LENDING RISK - Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.

PRODUCT RISKS

COMMODITIES RISK - Exposure to commodities in Adviser Clients accounts is in non-physical form, such as ETFs or mutual funds, there are risks associated with the movement in gold prices and the ability of the fund or trust manager to respond or deal with those price movements. There also may be initial charges as well as annual management fees associated with the fund or trust.

EXCHANGE-TRADED FUND ("ETF") AND MUTUAL FUND RISK - Investments in ETFs and mutual funds have unique characteristics, including, but not limited to, the ETF or mutual fund's expense structure. Investors of ETFs and mutual funds held within Adviser client accounts bear both their Adviser portfolio's advisory expenses and, indirectly, the ETF's or mutual fund's expenses. Because the expenses and costs of an underlying ETF or mutual fund are shared by its investors, redemptions by other investors in the ETF or mutual fund could result in decreased economies of scale and increased operating expenses for such ETF or mutual fund. Additionally, the ETF or mutual fund may not achieve its investment objective. Actively managed ETFs or mutual funds may experience significant drift from their stated benchmark. ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets, and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."

DIGITAL ASSET RISK - Digital Assets, and the use of virtual currencies to buy and sell goods and services, are relatively new and rapidly evolving concept. Once a transaction is recorded, that transaction is theoretically immutable and cannot be reversed due to the cryptographic nature of the recordkeeping and the decentralized nature of the network. Additionally, the growth of Digital Assets in general is subject to a high degree of uncertainty. The factors affecting their further development, include (i) their continued worldwide growth, adoption and use; (ii) government and quasi-government regulation of the use, creation and offering of Digital Assets, as well as restrictions on and regulation related to the operation of and access to a Digital Asset's network; (iii) changes in consumer demographics and public tastes and preferences; (iv) the maintenance and development of the open-source software protocol of a Digital Asset's network; (v) the availability and popularity of other forms or methods of buying and selling goods and services, including new means of using Digital Assets; (vi) general economic conditions and the regulatory environment relating to Digital Assets; and (vii) the negative perception of Digital Assets generally, including the use of Digital Assets to buy illicit goods and services. The price of Digital Assets is affected by many factors, including, but not limited to, global supply and demand, the expected future prices, inflation expectations, interest rates, and currency exchange rates. Pricing also might be influenced by efforts at

market manipulation by certain participants. Drastic or even gradual changes in price of cryptocurrencies and cryptocurrency derivatives could materially affect the value of the Client's Digital Assets.

STRUCTURED NOTES RISK - Structured products are designed to facilitate highly customized risk-return objectives. While structured products come in many different forms, they typically consist of a debt security that is structured to make interest and principal payments based upon various assets, rates, or formulas. Many structured products include an embedded derivative component. Structured products may be structured in the form of a security, in which case these products may receive benefits provided under federal securities law, or they may be cast as derivatives, in which case they are offered in the over-the-counter market and are subject to no regulation. Investment in structured products includes significant risks, including valuation, liquidity, price, credit, and market risks. One common risk associated with structured products is a relative lack of liquidity due to the highly customized nature of the investment. Moreover, the full extent of returns from the complex performance features is often not realized until maturity. As such, structured products tend to be more of a buy-and-hold investment decision rather than a means of getting in and out of a position with speed and efficiency. Another risk with structured products is the credit quality of the issuer. Although the cash flows are derived from other sources, the products themselves are legally considered to be the issuing financial institution's liabilities. The vast majority of structured products are from high-investment-grade issuers only. Also, there is a lack of pricing transparency. There is no uniform standard for pricing, making it harder to compare the net-of-pricing attractiveness of alternative structured product offerings than it is, for instance, to compare the net expense ratios of different mutual funds or commissions among broker-dealers.

ALTERNATIVE INVESTMENT RISK - Alternative assets may include a broad range of underlying assets including, but not limited to, publicly traded and non publicly traded private real estate investment trust REITS, private equity, lending funds, private close-end funds, and registered, publicly traded securities.

The firm will also offer oil and natural gas drilling limited partnerships being offered by MDS, Trellis, and U.S. Energy Development Corporation ("U.S. Energy" or the "Managing General Partner"). The USEDC Opportunity Zone III LP and the USEDC Drilling Fund LP is being offered to Accredited Investors only. Participants may invest as investor general partners, as limited partners, or as members of a limited liability company members LLC Members (investors who invest as limited partners or LLC Members are sometimes collectively referred to as "LP Investors").

The firm also will offer private closed-ended funds that seek to achieve risk-adjusted returns through a combination of a high level of current income and potential (although limited) long-term capital appreciation, while attempting to mitigate the risk of loss of principal.

At times the firm offers REITS through DLP Capital. Currently the firm uses the DLP LENDING FUND LLC with specific accredited clients. DLP Capital has been providing innovative real estate solutions and compelling investment opportunities for over 16 years. The DLP Lending Fund seeks to provide risk-adjusted returns and consistent monthly income by lending to experienced real estate developers and operators.

The DLP Lending Fund is an open-ended, private REIT that invests primarily through senior secured mortgage loans for the development, improvement, and preservation of attainable housing for working families.

Lastly, the firm will offer additional other REITs from other private trust companies. These REITs seek to provide potential income generation and risk adjusted returns through a variety of asset types, including industrial, retail, net-lease, office, and medical properties across the United States. These are designed for long-term investors, shares are considered illiquid with quarterly opportunities to redeem shares.

For all alternative investments offered to clients, the firm will provide the current PPM, and risk disclosures associated with each specific investment. Horizon will verify client suitability through an accredited investor form.

Alternative investments are speculative, not suitable for all clients and intended for only experienced and sophisticated investors who are willing to bear the high risk of the investment, which can include: loss of all or a substantial portion of the investment due to leveraging, short-selling, or other speculative investment practices; lack of liquidity in that there may be no secondary market for the fund and none expected to develop; volatility of returns; potential for restrictions on transferring interest in the fund; potential lack of diversification and resulting higher risk due to concentration of trading authority with a single advisor; absence of information regarding valuations and pricing; potential for delays in tax reporting; less regulation and typically higher fees than other

investment options. The SEC typically requires investors be accredited to invest in these more speculative alternative investments. Investing in a fund that concentrates its investments in a few holdings may involve heightened risk and result in greater price volatility.

The following offerings are available only through a broker-dealer and are not sold by the firm. A supervised person of the firm is a registered representative of Emerson Equity, an unaffiliated broker-dealer, and receives commissions for selling these offerings in that separate capacity. This creates a conflict of interest. Clients are under no obligation to purchase through Emerson Equity or any supervised person.

Supervised persons will also offer Lukrom iFund LP, a private, open-ended, real estate secured private credit fund managed by Lukrom Capital LLC and offered to accredited investors only. The fund seeks to provide monthly distributions at a targeted preferred return, which is not guaranteed, by making short-term loans to real estate borrowers secured by residential, multifamily, and commercial properties, and invests through a subsidiary REIT. Interests are illiquid, redemptions are limited to 20% of the fund's capital each year, and early withdrawals are subject to fees for the first 36 months.

Supervised persons will also offer Madison 12 Mile Investors II, LLC, a private common equity offering sponsored by Madison Capital Group to develop a 234-unit multifamily community in St. Augustine, Florida. Interests are offered to accredited investors only, are illiquid, and have an estimated term of 36 months. The offering targets a monthly preferred return, which is not guaranteed, followed by a profit split at liquidation. Supervised persons will recommend the offering in connection with Roth conversion planning, where the value of the interest at conversion may be lower than the amount invested. That tax result depends on a supportable valuation, may be challenged by the IRS, and is not guaranteed. Development projects carry risks of cost overruns, construction delays, lease-up shortfalls, and loss of the entire investment.

Supervised persons will also offer The True Life Companies Elite Fund I, a private real estate fund sponsored by The True Life Companies that controls or acquires residential land, pursues entitlements, and sells the land to homebuilders. The fund is offered to accredited investors only. The Priority Preferred Income Option targets a 10% preferred return paid monthly, which is not guaranteed, with return of capital and a profit split at exit. Interests are illiquid. Projects may be delayed or fail because of entitlement challenges, litigation, and housing market conditions, and investors may lose some or all of their investment.

Supervised persons will also offer Opportunistic Pistachio Ag Fund I QOZ, a private qualified opportunity fund that owns producing pistachio orchards in California. The fund is sponsored by a multigenerational farming family that handles the orchards, harvesting, farm management, and wholesale marketing in house. It is offered to accredited investors only and seeks current cash yield and land appreciation. Interests are illiquid. Risks include reliance on a single sponsor and a single crop, pistachio commodity price swings, California water and regulatory exposure, and dependence on sponsor projections. Tax treatment depends on the fund and each investor meeting qualification requirements and is not guaranteed. Investors may lose some or all of their investment.

Qualified Opportunity Zone ("QOZ") investments generally involve investments in Qualified Opportunity Funds ("QOFs") that invest in businesses or property located within designated economically distressed communities. These investments are intended to encourage long-term investment in designated areas and may provide certain federal tax benefits to eligible investors, subject to applicable requirements under the Internal Revenue Code. QOZ investments are typically long-term and may be illiquid, speculative, and subject to significant investment, real estate, business, regulatory, and tax risks, including the potential loss of principal. The availability and extent of any tax benefits depend on an investor's individual circumstances, compliance with applicable requirements, and current tax law, which may change over time. Investors should consult with their tax and legal advisers regarding the tax consequences and suitability of a QOZ investment before investing.

ADDITIONAL RISKS-

Important Disclosures

Investment advisory services are offered through Horizon Wealth, a Registered Investment Adviser. Registration as an investment adviser does not imply a certain level of skill or training. The information presented by HW Tax Strategies, including information provided through this website and associated links, is provided for informational

and educational purposes only and should not be construed as an offer or solicitation for the purchase or sale of any security or as personalized investment, legal, accounting, or tax advice. Information regarding investments, financial planning, and tax strategies is general in nature and may not be appropriate for every individual. Clients should consult with their investment, tax, legal, and other professional advisers regarding their specific circumstances before implementing any strategy.

Investment Risks

All investments and investment strategies involve risk, including the potential loss of principal, and no investment strategy can guarantee a profit or protect against loss. Unless specifically stated otherwise, investments are not guaranteed or insured. Investment strategies may be affected by market conditions, interest rates, economic conditions, liquidity, tax considerations, legislative or regulatory developments, and other factors.

Certain financial or tax-planning strategies may require the purchase, sale, retention, concentration, or restructuring of investments and may therefore expose a client to additional investment risks. A strategy may also result in reduced liquidity, restrictions on access to assets, longer holding periods, concentration risk, transaction costs, or other financial consequences. Clients should consider both the potential tax benefits and the investment risks and economic consequences of a strategy before proceeding.

Past performance is not indicative of future results. No representation is made that any investment or strategy will achieve its objectives or that any client will experience results similar to those described in examples, illustrations, or educational materials.

Tax and Planning Risks

Tax laws and regulations are complex and subject to differing interpretations and change. Tax-related strategies that may be discussed or recommended are dependent upon a client's individual circumstances and the tax laws, regulations, administrative guidance, and judicial decisions in effect at the applicable time. There is no assurance that a particular strategy will reduce, defer, or eliminate taxes or otherwise produce an anticipated tax result.

A tax or financial planning strategy may be challenged, modified, limited, or disallowed by the Internal Revenue Service, state or local taxing authorities, courts, or other governmental or regulatory authorities. Implementation of certain strategies may increase the likelihood of additional scrutiny or an audit and may result in additional taxes, interest, penalties, professional fees, or other costs if the intended tax treatment is not accepted.

Changes in federal, state, or local tax laws, regulations, interpretations, or a client's individual circumstances may adversely affect a strategy after it has been implemented. Strategies that are appropriate under current law may become less advantageous, unavailable, or subject to different tax treatment in the future.

Tax and financial planning strategies may also involve significant implementation and ongoing costs, including legal, accounting, valuation, administrative, investment management, custodial, insurance, trustee, filing, or other professional fees. These costs should be evaluated against the potential benefits of a strategy.

Client Responsibilities and Professional Advice

Successful implementation and maintenance of financial and tax-related strategies may require timely and accurate information from the client, ongoing client participation, execution of documents, adherence to deadlines, and coordination among the client's investment adviser, accountant, attorney, insurance professional, and other advisers. Failure to provide complete and accurate information or to complete required actions on a timely basis may affect the effectiveness of a strategy or result in unintended financial or tax consequences.

Unless specifically agreed otherwise in writing, Horizon Wealth and HW Tax Strategies do not provide legal or accounting advice. Clients are encouraged to consult qualified tax and legal professionals before implementing tax, estate planning, business planning, or other strategies involving legal or tax consequences.

Conflicts of Interest

Certain recommendations or strategies may create actual or potential conflicts of interest, including circumstances in which Horizon Wealth, HW Tax Strategies, an affiliated person, or another professional may receive compensation or otherwise benefit from the implementation of a recommendation. Material conflicts of interest are disclosed as required by applicable law. Clients should carefully review applicable disclosure documents, agreements, and information regarding fees, compensation, affiliations, and conflicts before implementing a recommendation.

No Guarantee of Results

Financial, investment, and tax planning involve assumptions regarding future events that cannot be predicted with certainty. Projections, illustrations, estimates, and examples are hypothetical unless otherwise indicated and should not be considered guarantees of future investment performance, tax savings, or financial results. Actual results may differ materially from those anticipated.

Clients should evaluate any strategy based on their individual objectives, financial circumstances, risk tolerance, liquidity needs, tax situation, and other relevant considerations and should consult appropriate investment, tax, accounting, and legal professionals before implementation.

NON-TRANSFERABILITY- Certain investments used by Adviser may not be transferrable to other custodians. Additionally, if they are transferrable, other advisors may be restricted to only sell the positions and not allowed to buy more. This could include certain institutional share class mutual funds, mutual funds closed to new investors, investment available only to approved firms like Horizon Wealth, alternative investments, structured notes, and interval funds.

ITEM 9 - DISCIPLINARY INFORMATION

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Our Firm and our management personnel have no material reportable disciplinary events to disclose. You may visit http://www.advisorinfo.sec.gov to review each investment advisors' individual disclosures or Horizon Wealth's disclosures.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Adviser does not have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

INSURANCE

Some of our IARs are also licensed insurance agents and sell various life insurance products. There is a conflict of interest to clients because our Firm and our IARs receive compensation (commissions, trails, or other compensation from the respective insurance products) as a result of effecting insurance transactions for clients. Commissions generated by insurance sales do not offset regular advisory fees. The Firm and the IAR have an incentive to recommend insurance products and this incentive creates a conflict of interest between your interests and our Firm. We mitigate this conflict by disclosing to clients they have the right to decide whether or not to engage the services of our IARs. Further, clients should note they have the right to decide whether to act on the recommendations and the right to choose any professional to execute the advice for any insurance products through our IAR or any licensed insurance agent not affiliated with our Firm. We recognize the fiduciary responsibility to place the client's interests first and have established policies in this regard to avoid conflicts of interest.

The Firm has taken steps to manage these conflicts of interest by requiring that each investment advisor representative:

- only recommend insurance and annuities when in the best interest of the client and without regard to the financial interest of the Firm and its investment advisor representative.
- not recommend insurance and/or annuities which result in its investment advisor representative and/or the Firm receiving unreasonable compensation related to the recommendation; and,
- disclose material conflicts of interest related to insurance or annuity recommendations.

MARKETING SOLUTIONS

Horizon Wealth Marketing Group, LLC, is an affiliated entity under common ownership. Daniel Blair and Melissa Blair, managing members of the registered investment advisory firm, are also managing members of Adviser Marketing Group, LLC. Horizon Wealth Marketing Group, LLC is a marketing agency offering products and services specific to other financial professionals for the marketing of certain tax strategies. Clients of Adviser will not be offered services from Adviser Marketing Group, LLC. Adviser Marketing Group, LLC, may receive a promoter fee. Daniel Blair and Melissa Blair, managing members of the registered investment advisory firm, are also managing members of HW Tax Strategies. HW Tax Strategies is a rebranded name of Horizon Wealth for the purpose of acknowledging high focus to mitigating in deferring taxes within wealth management structure.

REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

Adviser is not a broker/dealer, but some of our Investment Adviser Representatives ("IAR") are registered representatives of Emerson Equity ("Emerson"), a full-service broker-dealer, member FINRA/SIPC, which compensates them for effecting securities transactions. When placing securities transactions through Emerson in their capacity as registered representatives, they will earn sales commissions. Investment advisory services and advisory fees are offered separately through Horizon Wealth. Because the IARs are dually registered with Emerson and Horizon Wealth, Emerson has certain supervisory and administrative duties pursuant to the requirements of FINRA Conduct Rule 3040. Emerson and Adviser are not affiliated companies. Certain IARs of Adviser spend a portion their time in connection with broker/dealer activities.

As a broker-dealer, Emerson engages in a broad range of activities normally associated with securities brokerage firms. Pursuant to the investment advice given by Adviser or its IARs, investments in securities may be recommended for clients. If Emerson is selected as the broker- dealer, Emerson and its registered representatives, including IARs of Horizon Wealth, will receive commissions for executing securities transactions.

You are advised that if Emerson is selected as the broker-dealer, the transaction charges may be higher or lower than the charges you may pay if the transactions were executed at other broker/dealers. You should note, however, that you are under no obligation to purchase securities through IARs of Adviser or Emerson. Moreover, you should note that under the rules and regulations of FINRA, Emerson has an obligation to maintain certain client records and perform other functions regarding certain aspects of the investment advisory activities of its registered representatives. These obligations require Emerson to coordinate with and have the cooperation of its registered representatives that operate as, or are otherwise associated with, investment advisers other than Emerson. Accordingly, Emerson may limit the use of certain custodial and brokerage arrangements available to clients of Adviser and Emerson may collect, as paying agent of Horizon Wealth, the investment advisory fee remitted to Adviser by the account custodian. Emerson may charge an administrative Fee to the Firm. This charge will not increase the advisory fee you have agreed to pay Horizon Wealth.

IARs of Horizon Wealth, in their capacity as registered representatives of Emerson, or as agents appointed with various life, disability or other insurance companies, receive commissions, 12(b)-1 fees, fee trails, or other compensation from the respective product sponsors and/or as a result of effecting securities transactions for clients. However, clients should note that they have the right to decide whether or not to purchase any investment products through Horizon Wealth's representatives.

DISCLOSURE OF CONFLICTS OF INTEREST

Our management personnel and investment advisor representatives may engage in outside business activities. As such, these individuals can receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of investment advisory Clients. Clients are not under any obligation to engage these individuals when considering the implementation of these outside recommendations. The implementation of any or all recommendations is solely at the discretion of the Client. Clients should be aware that the ability to receive additional compensation by our Firm and its management persons or employees creates inherent conflicts of interest in the objectivity of the Firm and these individuals when making advisory recommendations. Our Firm endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps, among others to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for the Firm, investment advisors, and our employees to earn compensation from advisory clients in addition to the Firm's advisory fees.
- we disclose to clients that they have the right to decide to purchase recommended investment products from our employees.
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives, and liquidity needs.
- the Firm conducts regular reviews of each client advisory account to verify that all recommendations made to a client are in the best interest of the client's needs and circumstances.
- we require that our investment advisors and employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed.
- we periodically review these outside employment activities of the investment advisor to verify that any conflicts of interest continue to be properly disclosed by the investment advisor; and
- we educate our investment advisors regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

ITEM 11- CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

Horizon Wealth has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our investment advisors and employees, including compliance with applicable federal securities laws. Horizon Wealth and its investment advisors owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code. Our Code of Ethics includes policies and procedures for the reporting and review of personal securities transactions reports by our Firm's investment advisors and employees. In addition, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement, and recordkeeping provisions.

Horizon Wealth 's Code of Ethics further includes the Firm's policy prohibiting the use of material non-public information. While we do not believe that we have any access to non-public information, all investment advisors are reminded that such information may not be used in a personal or professional capacity. Horizon Wealth and its investment advisors are prohibited from engaging in principal transactions and agency cross transactions.

Our Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of our investment advisors will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing investment advisors to invest for their own accounts. Our Firm and/or investment advisors or employees may buy or sell for their personal accounts securities that are identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client. It is the expressed policy of our Firm that no investment advisor may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such investment advisor(s) from benefiting from transactions placed on behalf of advisory accounts.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. Clients may request a copy by calling us at (303) 777-7124.

ITEM 12 - BROKERAGE PRACTICES

We generally recommend that clients utilize the custody, brokerage and clearing services of Fidelity Institutional Wealth Services ("Fidelity"), Charles Schwab & Co., Inc ("Charles Schwab"), Interactive Brokers, Community National Bank ("CNB") (defined in this document as "Custodian(s)") for investment management accounts subject to our duty to seek best execution and other fiduciary duties. We may recommend other custodians beside Fidelity and Charles Schwab based on your needs and the services offered.

We recommend that you establish accounts with these Custodians to maintain custody of your assets and to effect trades for your accounts. Some of the products, services and other benefits provided by our Custodians benefit us and may not benefit you or your account. Our recommendation/requirement that you place assets with one of these Custodians may be based in part on benefits they provide us, and not solely on the nature, cost or quality of custody and execution services provided by the custodian. The Custodian we utilize makes available to us other products and services that benefit us but may not benefit your accounts in every case.

Custodian(s) provides various benefits and payments to registered investment advisers that are new to the Custodial platform to assist the firm with the costs associated with starting a Registered Investment Advisory firm and transitioning the business to Custodian (collectively referred to as "Transition Assistance"). The proceeds of such Transition Assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, initial registration, compliance assistance, legal assistance, and technology expenses incurred as a result of the firm transitioning to Custodian's custodial platform. The amount of the Transition Assistance payments is often significant in relation to the overall revenue earned or compensation received by the Firm.

The receipt of Transition Assistance by Horizon Wealth creates conflicts of interest relating to Horizon Wealth 's advisory business because it creates a financial incentive for Horizon Wealth to recommend that its clients maintain their accounts with Custodian. Horizon Wealth attempts to mitigate these conflicts of interest by evaluating and recommending that clients use Custodian's services based on the benefits that such services provide to our clients, rather than the Transition Assistance earned by Horizon Wealth. Horizon Wealth considers Custodian's execution capability when recommending or requiring that clients maintain accounts with Custodian. However, clients should be aware of this conflict and take it into consideration in making a decision whether to custody their assets in an account at Custodian.

Some of the other Custodian's products and services assist us in managing and administering your accounts. These include software and technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of our fees from your account, and assist with back-office functions, recordkeeping and reporting.

We are independently owned and operated and not affiliated with these Custodians. They provide us with access to their institutional trading and custody services. These services include brokerage, custody, research and access to mutual funds and other investments that are otherwise generally available only to institutional investors.

You have the right not to act upon any recommendations, and if you elect to act upon any recommendations, you have the right to not place the transactions through any broker/dealer we recommend. Our recommendation is generally based on the broker's cost and fees, skills, reputation, dependability and compatibility with the client. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services given to us is not a factor in determining the selection of broker/dealer or the reasonableness of their commissions.

We place trades for your account subject to our duty to seek best execution and other fiduciary duties. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services given to us is not a factor in determining the selection of broker/dealer or the reasonableness of their commissions. The Custodian's execution quality may be different than other broker-dealers.

Many of these services generally may be used to service all or a substantial number of our accounts. The Custodians also make available to us other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, the custodians may make available, arrange and/or pay for these services rendered to us by third parties. The Custodians may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us.

While as a fiduciary, we endeavor to act in your best interest, our recommendation that you maintain your assets in accounts at our recommended custodians may be based in part on the benefit to us or the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a conflict of interest. IARs endeavor at all times to put the interest of our clients first as a part of their fiduciary duty.

There is no direct link between our participation in a Custodian's platform and the investment advice we give to our clients. We/you may receive economic benefits through our participation in the platforms that may not be available to other advisors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. The Custodians may also have paid for business consulting and professional services received by some of our related persons. Some of the products and services made available by the Custodians through the program may benefit us but may not benefit your account. These products or services may assist us in managing and administering your account, including accounts not maintained at the Custodians. Other services made available by the Custodians are intended to help us manage and further develop our business enterprise. The benefits received by our firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to the Custodians. As part of our fiduciary duties to clients, we endeavor at all times to act in the best interest of our clients. You should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a conflict of interest and may indirectly influence our choice of the Custodians for custody and brokerage services.

We place trades for our clients' accounts subject to its duty to seek best execution and its other fiduciary duties. Custodian's execution quality may be different than other Custodians.

Our Firm annually reviews the relationship between our Custodian, Horizon Wealth and the client in order to determine if the custodial relationship is in the best interest of the client.

BROKERAGE FOR CLIENT REFERRALS

Our Firm does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.

AGGREGATION AND ALLOCATION OF TRANSACTIONS

We, or our third party money managers, may aggregate transactions if we believe that aggregation is consistent with the duty to seek best execution for our clients and is consistent with the disclosures made to clients and terms defined in the client investment advisory agreement. No advisory client will be favored over any other client, and each account that participates in an aggregated order will participate at the average share price (per custodian) for all transactions in that security on a given business day.

If we do not receive a complete fill for an aggregated order, we will allocate the order on a pro-rata basis. If we determine that a pro-rata allocation is not appropriate under the particular circumstances, we will base the allocation on other relevant factors, which may include:

- When only a small percentage of the order is executed, with respect to purchase allocations, allocations may be given to accounts high in cash
- With respect to sale allocations, allocations may be given to accounts low in cash
- We may allocate shares to the account with the smallest order, or to the smallest position, or to an account that is out of line with respect to security or sector weightings, relative to other portfolios with similar mandates
- We may allocate to one account when that account has limitations in its investment guidelines prohibiting it from purchasing other securities that we expect to produce similar investment results and that can be purchased by other accounts in the block

- If an account reaches an investment guideline limit and cannot participate in an allocation, we may reallocate shares to other accounts. For example, this may be due to unforeseen changes in an account's assets after an order is placed
- If a pro-rata allocation of a potential execution would result in a de Minimis allocation in one or more accounts, we may exclude the account(s) from the allocation
- We will document the reasons for any deviation from a pro-rata allocation.

TRADE ERRORS

We have implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole, and we will absorb any loss resulting from the trade error if the error was caused by the Firm. If the error is caused by the custodian, the custodian will be responsible for covering all trade error costs. If an investment gain results from the correcting trade, the gain will be donated to charity. We will never benefit or profit from trade errors.

DIRECTED BROKERAGE

We do not routinely recommend, request, or require that you direct us to execute transactions through a specified broker-dealer. Additionally, we typically do not permit you to direct brokerage. We place trades for your account subject to our duty to seek best execution and other fiduciary duties.

ITEM 13 - REVIEW OF ACCOUNTS

ACCOUNT REVIEWS AND REVIEWERS

Our Investment Adviser Representatives will monitor investment management client accounts on a regular basis and perform annual reviews with each client. All accounts are reviewed for consistency with client investment strategy, asset allocation, risk tolerance, and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in an account holder's personal, tax, or financial status. Geopolitical and macroeconomic specific events may also trigger reviews. Clients are urged to notify us of any changes in your personal circumstances. Clients are invited to meet with the Firm annually.

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for. Ongoing management of the financial planning portal is maintained by our Firm.

STATEMENTS AND REPORTS

Performance reports from our Firm are generated for clients during annual reviews or as requested.

The Custodian for the individual client's account will also provide clients with an account statement at least quarterly. Clients are urged to compare the reports provided by Horizon Wealth against the account statements the clients receive directly from your account custodian.

Financial Planning clients will receive access to an online financial planning portal. Additional reports will not typically be provided unless otherwise contracted for.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

At times, we will receive expense reimbursement for travel and/or marketing expenses from distributors of investment and/or insurance products. Travel expense reimbursements are a result of attendance at due diligence and/or investment training events hosted by product sponsors. Marketing expense reimbursements are the result of informal expense sharing arrangements in which product sponsors will underwrite costs incurred for marketing such as client appreciation events, advertising, publishing, and seminar expenses. Receipt of these travel and marketing expense reimbursements are dependent upon specific sales quotas, the product sponsor reimbursements are made by those sponsors for which sales have been made or for which it is anticipated sales will

be made. This creates a conflict of interest in that there is an incentive to recommend certain products and investments based on the receipt of this compensation instead of what is in the best interest of our clients. We attempt to control this conflict by always basing investment decisions on the individual needs of our clients. Our Firm and our supervised persons do not accept or receive compensation based on the sale of securities.

Horizon Wealth may be asked to recommend a financial professional, such as an attorney, accountant or mortgage broker. In such cases, our Firm does not receive any direct compensation in return for any referrals made to individuals or firms in our professional network. Clients must independently evaluate these firms or individuals before engaging in business with them and clients have the right to choose any financial professional to conduct business. Individuals and firms in our financial professional network may refer clients to our Firm. Again, our Firm does not pay any direct compensation in return for any referrals made to our firm. Our Firm does recognize the fiduciary responsibility to place your interests first and have established policies in this regard to mitigate any conflicts of interest.

As referenced in Item 10 and Item 12 above, the Firm receives an economic benefit from broker-dealers. The Firm, without cost (and/or at a discount), receives support services and/or products from broker-dealers. And, some of our Investment Adviser Representatives are registered representatives of unaffiliated broker-dealers. Individuals who are dually registered as investment advisor representatives and registered representatives of a broker-dealer, will receive commissions for executing securities transactions.

There is no corresponding commitment made by the Adviser to a broker-dealer or any other entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities, or other investment products as a result of the above arrangement.

Promoter Arrangements
Affiliated or unaffiliated persons ("promoters") may, from time to time, refer, solicit, or introduce clients to our Firm. Our Firm may compensate certain promoters consistent with the requirements of applicable law and regulation, including the Advisers Act as well as applicable state/local laws and regulations. We may pay a promoter a recurring fee, a one-time fee or a portion of the advisory fees or revenues that we earn for managing client or investor assets referred to us by the promoter. The costs of such referral fees are typically paid entirely by our Firm and do not result in any additional charges to the client or investor.

It is Horizon Wealth's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards, or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

ITEM 15 - CUSTODY

Horizon Wealth does not have physical custody of any client funds and/or securities and does not take custody of client accounts at any time. Client funds and securities will be held with a bank, broker dealer, or other independent qualified custodian.

DEDUCTION OF ADVISORY FEES
Horizon Wealth is deemed to have limited custody of client funds and securities whenever Horizon Wealth is given the authority to have fees deducted directly from client accounts, as described further in Item 5 above. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody. Account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Horizon Wealth . When the client has questions about their account statements, the client should contact Horizon Wealth or the qualified custodian preparing the statement.

Our authority to direct client requests, utilizing standing instructions, for wire transfer of funds for first-party money movement and third-party money movement (checks and/or journals, ACH, Fed-wires). The SEC issued a no-action letter ("Letter") with respect to the Rule 206(4)-2 ("Custody Rule") under the Investment Advisors Act of 1940 ("Advisors Act"). The letter provided guidance on the Custody Rule as well as clarified that an Advisor who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. As such, our Firm has adopted the following safeguards in conjunction with our custodians. The firm has elected to meet the SEC's seven conditions to avoid the surprise custody exam, as outlined below:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client's

qualified custodian.

5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Individual advisory clients will receive at least quarterly account statements directly from their custodian containing a description of all activity, cash balances, and portfolio holdings in their accounts. Clients are urged to compare the account balance(s) shown on their account statements to the quarter-end balance(s) on their custodian's monthly statement. The custodian's statement is the official record of the account.

ITEM 16- DISCRETION

Before Horizon Wealth can buy or sell securities on your behalf, the client must first sign our discretionary management agreement, a limited power of attorney, and/or trading authorization forms. By choosing to do so, the client may grant the Firm discretion over the selection and number of securities to be purchased or sold for the client's account(s) without obtaining your consent or approval prior to each transaction. Clients may impose limitations on discretionary authority for investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.), as well as other limitations as expressed by the client. Limitations on discretionary authority are required to be provided to the IAR in writing. Please refer to the "Advisory Business" section of this Brochure for more information on our discretionary management services.

ITEM 17-VOTING CLIENT SECURITIES

As a matter of Horizon Wealth policy, Horizon Wealth does not vote proxies on behalf of clients. Therefore, it is your responsibility to vote for all proxies for securities held in your Account. The client will receive proxies directly from the qualified custodian or transfer agent; we will not provide the client with the proxies. Although we do not vote client proxies, if the client does have a question about a particular proxy feel free to contact the custodian directly.

ITEM 18- FINANCIAL INFORMATION

As an advisory firm that maintains discretionary authority for client accounts, Horizon Wealth is also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Horizon Wealth has no such financial circumstances to report. Under no circumstances do we require or solicit payment of fees in excess of $1,200 per client more than six (6) months in advance of services rendered. Therefore, we are not required to include a financial statement. Horizon Wealth has not been the subject of a bankruptcy petition at any time during the past ten (10) years.

PRIVACY POLICY

Our Firm collects nonpublic personal information about Clients from information provided on applications or other forms, as well as from information regarding Client transactions with our Firm, our affiliates, or others. In accordance with Regulation S-P, our Firm does not disclose any nonpublic personal information about current or former Clients to third parties, except as permitted or required by law, or as necessary to service Client accounts. Access to Client information is restricted to Firm personnel who require such information to provide investment advisory services. Our Firm maintains physical, electronic, and procedural safeguards designed to protect Client information in compliance with federal standards and Regulation S-P. Our Firm provides a copy of its Privacy Policy to Clients at the time of account opening, upon request, and annually if the Policy is amended.

ARTIFICIAL INTELLIGENCE

Definition: Artificial Intelligence Engines and Machine Learning (collectively "AI") is an umbrella term that encompasses a broad spectrum of different technologies and applications including supervised, unsupervised machine learning, reinforcement and deep machine learning, natural language processing, computer vision, among other processes. The Advisers Act does not contain a definition of the term "AI" and there is no single universally agreed upon definition of AI. Investment advisers who use AI should consider the unique issues that their use of AI technology raises in light of an adviser's fiduciary duty to its clients and whether it is in their client's best interest.

Our Firm permits the use of certain artificial intelligence tools for internal operational efficiency (Notetaking). However, the Firm prohibits the use of AI tools for investment-related processes such as the formulation of investment advice, managing client assets or making trading decisions. It is important to note that all analysis, conclusions, and final outputs are developed and reviewed by qualified professionals. All decisions and deliverables are subject to human oversight and comply with applicable regulatory standards. Our firm does not use AI for an investment related decisions.