FORM ADV PART 2A

Firm Brochure

This brochure provides information about the qualifications and business practices of Innovia Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (616) 719-5007. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Innovia Wealth, LLC is a registered investment adviser.
Registration of an investment adviser does not imply any level of skill or training.

Additional information about Innovia Wealth, LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number.
Innovia Wealth, LLC's CRD number is 289913.

INNOVIA WEALTH

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Item 2 - Material Changes

This brochure includes the following material changes:

We have added disclosures in **Item 4 – Advisory Business** and **Item 14 – Client Referral and Other Compensation** regarding GLASfunds, a private equity investment platform that we may recommend to clients. These disclosures explain the nature of the relationship and related conflicts of interest.

Additionally, we have updated **Item 4 – Advisory Business** to reflect organizational changes that do not affect control or management of the firm.

This brochure is updated periodically to reflect non-material changes to our business. We encourage clients to review this brochure carefully and to contact us with any questions.

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Item 4 - Advisory Business

OWNERSHIP/ADVISORY HISTORY

Innovia Wealth, LLC ("We") is a Michigan limited liability company founded by Michael Berkemeier. We became registered as an investment adviser in December 2017. We are wholly owned by Innovia Wealth Holdings, LLC, which is owned by Michael Berkemeier and Aaron Veldheer, who serve as Managing Directors, and by John Vande Guchte and Mark Ghafari, who serve as Partners. Stacy Spain is the firm's Chief Compliance Officer.

ADVISORY SERVICES OFFERED

Innovia Wealth's client base consists primarily of high-net-worth clients – including businesses and business owners – and our wide range of advisory services are structured and designed to meet the demands and complexities facing our client base. Our investment professionals primarily provide advice on a discretionary basis, and we have the authority to select securities or other investment vehicles (collectively, "securities") consistent with our clients' investment guidelines. All clients have the ability to limit or prohibit investments, as discussed in **Item 16 - Investment Discretion**.

We believe clients need access to a variety of financial tools based on each client's unique circumstances. In addition to investment advisory services, we align ourselves with various individuals and entities that enhance our firm's product or services offering. For example, we have a relationship with an insurance agency to provide clients with access to fixed insurance products if the client needs them. We also manage a private fund, designed to fill a specific need for certain clients. All our affiliations and arrangements are discussed in further detail throughout this brochure and specifically in **Item 9 Other Financial Industry Activities and Affiliations** and **Item 13 Brokerage Practices**.

Investment Management

A significant focus of our business centers around investment management. That is, monitoring, trading, divesting, and reallocating securities and holdings within the client's accounts. No two clients' needs or circumstances are the same. As such, we focus on the client's unique financial picture and objective when designing their investment portfolios and we strive to design a balanced, diversified, and custom portfolio that will meet the client's financial circumstances and needs.

We manage accounts that are held by our firm's custodians, as discussed below in **Item 13 Brokerage Practices**. Our relationship with our custodians is important to our success based on the services provided and the investments available to our firm through each custodian. Each custodian operates differently, and the costs charged by each custodian are different, as well.

Costs, investment availability, trading capabilities, client accessibility and various other factors weigh into our decision of which custodian to choose when opening a managed account for a client.

Financial Planning

We offer financial planning services to evaluate a client's financial situation, goals, and risk tolerance. Through a series of personal interviews and/or the use of questionnaires we collect pertinent data, identify goals, objectives, financial problems, and potential solutions. We use this information to prepare specific recommendations to present to the client. Our advice may cover any of the following topics: net worth statement, cash flow analysis, tax analysis, insurance analysis, estate planning techniques, retirement projections, 401k reviews, or other needs as identified during our meetings with the client. The client will receive a written financial plan following our meetings.

Our financial planning services cover aspects of our business or the client's financial needs not covered by our investment management services. For example, as part of our financial planning services we provided various services or detailed analyses and reports, including, but not limited to, the following:

- Income Planning
- Educational Funding
- Investment Advice on Held Away Assets
- Insurance Planning
- Personal Catastrophic Planning
- Retirement Planning
- Tax Planning
- Alternative Investment Reviews
- Estate Management and Wealth Transfer
- Philanthropy
- Budgeting and Cash Flow Planning

We generally do not charge a financial planning fee for services where we are already getting paid an AUM Fee.

Clients do not need to open accounts at our firm to take advantage of our financial planning services. We can provide advice on assets held elsewhere; however, we will not be able to implement our advice unless the assets are held by an Innovia Wealth custodian.

Retirement Plan Services

We recognize the path to retirement requires planning, dedication, and diligence. We analyze the client's financial holdings, income and earnings projections, goals and objectives, and business-related considerations when designing a retirement plan. We review retirement accounts such as their 401k or IRA.

In addition to helping individuals plan for retirement, we also serve as an adviser to retirement plans.

Fiduciary Services to Participant-Directed Defined Contribution Plans

For participant-directed defined contribution plans, our firm's fiduciary services include assisting ERISA plan clients with the following:

- Selecting a broad range of investment options consistent with ERISA Section 404(c);
- Making decisions around selection, retention, removal, and addition of investment options;
- Developing and maintaining an investment policy statement; and
- Selecting investments that will serve as qualified default investment alternatives ("QDIA") for participants who fail to make an investment election, provided the ERISA plan client has determined that the plan should provide a QDIA.

Our firm provides these services on a discretionary and non-discretionary basis. If an ERISA Plan Client elects the nondiscretionary option, the client retains and exercises final decision-making authority and responsibility for the implementation (or rejection) of our recommendations or advice. If the ERISA Plan Client elects the discretionary option, we will be authorized and responsible for implementing changes to the plan's mutual fund lineup by directly contacting the record-keeper.

Fiduciary Services to Defined Contribution Plans that are not Participant-Directed and Not Defined Benefit Plans

For defined contribution plans that are not participant-directed and not defined benefit plans, our firm's fiduciary services include developing and implementing an investment policy statement, developing the asset allocation and portfolio modeling, identifying and selecting specific investments to populate the asset allocation categories, providing periodic re-balancing as deemed appropriate, and adding, removing, and/or modifying the underlying investments that populate the asset allocation categories.

Our firm provides these fiduciary services on a discretionary basis as an investment manager under ERISA Section 3(38) and, in that capacity, our firm's investment decisions are made in its sole discretion without the ERISA Plan Client's prior approval.

Non-Fiduciary Services to ERISA Plan Clients

Our firm's non-fiduciary services to ERISA Plan Clients include, in the case of participant-directed plans, assisting in group enrollment meetings and educating plan participants about general investment principles and the investment alternatives under the plan.

Subadviser Services

We may, from time to time, utilize the services of a subadviser to manage some or all of the client's assets on a discretionary basis and in accordance with their stated investment objectives. In these situations, we offer consulting and advisory services in overseeing the portfolio manager. We maintain discretion to remove or replace any sub-adviser managing the client's account. We make recommendations regarding the use of a portfolio manager and the applicability of the subadviser's investment style based on a review of the client's financial needs, long-term goals, and investment objectives, as well as any other relevant factors.

Should Innovia choose to work with a subadvisor, we would select an advisor that would offer multiple strategies. Once a portfolio manager is selected, we would continue to monitor the chosen firm to ensure it adheres to the philosophy and investment style for which it was selected and to ensure its performance, portfolio strategies, and management remain aligned with the client's overall investment goals and objectives. We would retain discretionary authority to hire and fire the portfolio manager and reallocate the client's assets to other portfolio managers if doing so is in their best interest. Innovia Wealth would perform ongoing reviews that include, but are not limited to, assessment of the portfolio manager's disclosure brochure, performance information, materials, personnel turnover, and regulatory events. The client would receive a copy of each portfolio manager's Form ADV Part 2A, which includes a description of the portfolio manager's services and fees.

We also enter into agreements with other registered investment advisers to provide research services, as discussed below in **Section 12 Research and Soft Dollars.**

Private Fund Management

Innovia Wealth started a private equity fund, Strategies+ TRM Equity Fund II ("Strategies+ TRM" or the "Fund") and operates as the Fund's manager. A private equity fund is a pooled investment vehicle that is excluded from the definition of an investment company under the Investment Company Act of 1940. The private fund manager is responsible for implementing a fund's investment strategy and managing its trading activities. Strategies+ TRM's assets are held by CIBC Bank USA. The Fund is not available to all clients. Clients who invest in Strategies+ TRM must be qualified purchasers. Because of the complexity related to private equity funds, clients investing in Strategies+ TRM will receive fund related offering documents, questionnaires, and disclosures outlining the risks, costs, and other pertinent information related to the Fund at the time of investment.

Additionally, Innovia Wealth recommends private equity funds offered through the GLASfunds ("GLAS") platform. GLAS provides discretionary investment advisory services to GLASfunds, LP and GLASfunds, SPC (each, a "Fund", and together, the "Funds"). The Funds provide investors with the ability to create customized portfolios of hedge fund and private equity investments. Each investor in a Fund, with assistance from GLAS, will allocate its investment in each Fund to one or more investment strategies (each an "Investment Strategy"). Each Investment Strategy constitutes a separate series of interests or shares of the relevant Fund. Private funds are typically only available to high-net-worth individuals who qualify as accredited investors or qualified purchasers and who meet minimum investment thresholds. We recommend GLAS to investors who meet the relevant investment qualifications and for whom a private fund is appropriate based on investing goals and objectives. At the time of investment, you will receive fund-related offering documents, questionnaires, and disclosures outlining the risks, costs, and other pertinent information. Innovia does receive investment management fees when you invest with GLAS, as described in Item 5 – Fees and Compensation, which are calculated based on the net asset value of the Funds. Additionally, Innovia receives non-cash compensation from GLAS which creates a conflict of interest, as disclosed in Item 14 – Client Referrals and Other Compensation.

No matter how the client engages our firm, Innovia Wealth ensures that all investment advisory services are tailored to their unique circumstances, goals, and objectives. We manage the client's account based on their financial situation and objectives and in accordance with any reasonable restrictions imposed by them in terms of the management of the client's account.

Family Office Services

Innovia Wealth started offering "Family Office services" to certain investment management clients. The family office services include the following: thorough reviews and monitoring of clients' investment assets, including investment strategies and assets that are not directly managed by Innovia; tax planning and services, family succession planning and education; bookkeeping; insurance advice; and bill paying services, among other things.

Eligibility for Family Office Services is on a case-by-case basis. Innovia Wealth has a separate tiered fee schedule for Family Office Services. These fees may or may not be separate from the firm's standard "asset based" fee that is charged to clients for Innovia Wealth's ongoing investment management. The Family Office Agreement lays out the exact fee structure. See Item 5 Fees and Compensations for applicable fee schedules. Fees for Family Office services will not exceed Innovia's maximum fee schedule referenced in Item 5.

CLIENT ASSETS MANAGED

As of December 31, 2024, we manage $ 2,112,836,767in discretionary assets and $317,885,164 in non-discretionary assets.

Item 5 - Fees and Compensation

INVESTMENT MANAGEMENT FEES

Our fee for managing assets within the client's advisory accounts ("Investment Management Fee") is based on a percentage of assets under management in the account. Our standard Investment Management Fee schedule is as follows:

Custodian Reported Value	Annualized Management Fee
$0-$2,500,000	1.00%
$2,500,0001 – $5,000,000	0.90%
$5,000,001 – $10,000,000	0.60%
$10,000,001 – $25,000,000	0.50%
$25,000,001 - $50,000,000	0.45%
$50,000,001 - $100,000,000	0.40%
Above $100,000,001	0.35%

The maximum fee that a client can be charged is 1.70% of assets under management.

INVESTMENT MANAGEMENT FEE BILLING PROCEDURES

We calculate and collect our investment management fee monthly, in advance. This means we will collect the management fee at the beginning of each month. The management fee the client is charged for the upcoming month is based on the custodian's reported value of the account as of the last business day of the previous month. The management fee will be deducted directly from the client's account by the custodian. We also invoice certain clients for our fees. Cash balances and investments in money market funds held in the account are generally counted toward the account value and are included in the management fee calculations.

We are willing to negotiate fees, depending on the aggregate size or nature of a relationship, including for large individual or institutional clients. Also, fee schedules for some clients do vary and are higher than the standard schedule shown above. This is due to various factors, including, but not limited to, many being "legacy" in nature. Additionally, Innovia Wealth waives the annual fee for employees and some of their family members may have a discounted rate.

In billing our client accounts for management fees, we typically "group" them by family (or "household") as a way for clients to reach breakpoints, such as those shown above in our standard fee schedule. In addition, we, at our discretion, group multiple households or multiple client relationships together for the purpose of reaching fee breakpoints. Under these circumstances, we acknowledge that individual clients or client households may not have complete control over whether or not they reach fee breakpoints. In other words, one client's decision to increase or decrease their assets under Innovia Wealth's management may affect whether or not another client within the same household will reach a breakpoint. Clients should understand that the grouping of accounts within households, or across multiple households or relationships for the purposes or reaching fee breakpoints, is solely at our discretion.

Investment Management Fee Structure

The management fee is tiered, which means the applicable rate will be applied to the custodian reported account value in each account value range. For example, with a $9,000,000 account value, the first $2,500,000 will be charged at 1.00%. The next $2,500.000 will be charged at 0.90%. The remaining $4,000,000 will be charged at a rate of 0.60%.

The client does not pay brokerage commissions, markups, or transaction charges for execution of transactions in addition to the management fee. However, our Investment Management Fee is not a wrap fee. A wrap fee program generally involves an investment account where the client is charged a single, bundled, or "wrap" fee for investment advice, brokerage services, administrative expenses, and other fees and expenses. Additional costs that could be charged outside of the Investment Management Fee are, as follows:

- Transaction Fees. For certain transactions, the client may pay a fee. Wire fees, account closing fees, and transfer fees are examples of additional transaction fees.

- Mutual Funds and ETFs. These investments have additional fees, charged by the custodian. We do not receive a portion of these fees. Mutual funds and ETFs also have internal expenses that will reduce the value of the client's investment over time.
- Subadviser fees. Our Investment Management Fee does not include the sub-adviser's management fee. If a sub-adviser is selected, the client will be asked to grant us the ability to instruct the custodian to withdraw the sub-adviser's management fee the same time our management fee is withdrawn. This authorization can be terminated at any time.

FINANCIAL PLANNING SERVICES

Our fee related to financial planning services provided ("Financial Planning Fee") varies. However, hourly fees cannot exceed $1,000/hour and Innovia Wealth typically does not allow flat or project-based fees to exceed $75,000. The number of hours and the subsequent financial planning fee will vary based on the complexity of the financial situation, time involved (including preparation and research), number of financial topics covered, and the size of the client and their assets under management. The estimated fee will be disclosed in the financial planning agreement. The fee may be negotiable. We do not collect more than $1,200 in fees six (6) or more months in advance.

TERMINATING OUR SERVICES

The client may terminate our Investment Management Services for any reason within the first five (5) business days after signing an Investment Management Agreement and receive a 100% refund of any prepaid fees, without any cost or penalty. Thereafter, the Investment Management Agreement may be terminated at any time by giving ten (10) days' written notice to us at the following address:
Innovia Wealth, LLC, 171 Monroe Ave NW, Suite 800, Grand Rapids, MI 49503.
Upon receipt of written notice of termination, if the client were being charged in advance, they will receive a prorated refund based on the amount of time services were rendered during the management period.

The client may terminate their Financial Planning Agreement without incurring any fee or penalty, within the first five (5) business days after this Agreement is executed. After the initial five (5) business days, either the client or Innovia Wealth may terminate this Agreement upon ten (10) business days' written notice to the other. Written notice can be provided to the address noted above (see section, Terminating Our Services – Investment Management Services). Upon termination, the client will be refunded the advisory fee paid for the quarter, prorated based on services provided. If we have completed the financial planning project, the client will be responsible for paying any remaining balance due.

RETIREMENT ROLLOVER CONFLICTS OF INTEREST

When we recommend the client roll over a retirement account for us to manage, this creates a financial incentive because we charge a fee for our services. We attempt to mitigate the conflict of interest by comparing the services and fees associated with their existing plan to the services and fees we provide. At all times, our recommendations are made with the client's best interests in mind. Please note that the client is not under any obligation to roll over a retirement account to an account managed by us.

FAMILY OFFICE SERVICES

Innovia Wealth's Family Office Services charges a fee to clients for the added services being provided to the client. This fee, in some circumstances, is in addition to their investment management fee, depending on the nature of the services provided. Similar to management fees, they are negotiable on a client-by-client basis. The fee is charged on a monthly basis and covers various services including but not limited to thorough reviews and monitoring of clients' investment assets, investment strategies and assets that are not directly managed by Innovia; tax planning and services; family succession planning and education; bookkeeping; insurance advice; and bill paying services.

Item 6 - Performance-Based Fees and Side by Side Management

We do not charge performance-based fees. Performance-based fees are fees based on a share of capital gains on, or capital appreciation of, the client's assets.

Item 7 - Types of Clients

We offer our services to individuals, high net worth individuals, businesses/corporations, charities, and pension and profit-sharing plans. We require a minimum household account size of $1,000,000, which may be waived at our discretion.

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

Innovia Wealth uses a variety of analysis methods and investment strategies when developing our investment advice and managing the client's assets.

METHODS OF ANALYSIS

The methods of analysis include the following:

1. **Fundamental Analysis:**

   Fundamental analysis is a technique that attempts to determine a security's value by focusing on underlying factors that affect a company's actual business and its future prospects. The analysis is performed on historical and present data. On a broader scope, one can perform fundamental analysis on industries or the economy as a whole. The term refers to the analysis of the economic well-being of a financial entity as opposed to only its price movements. The risk associated with fundamental analysis is that despite the appearance that a security is undervalued, it may not rise in value as predicted.

RISKS: Vulnerability to wrong data, including the client's assumptions.

Fundamental analysis is heavily based in fact, but if a company incorrectly reports data or the client misinterprets them, the client is going to have a false conclusion.

2. **Technical Analysis:**

   Reviewing patterns and trends of a specific security/sector by using data of past prices and volume. The goal is to predict what a security will do in the future.

   RISKS: Analysis and execution of the data is subject to human nature: a person is reviewing the data and people can be wrong in their analysis. Past performance is not a guarantee of future performance.

3. **Quantitative Analysis:**

   Quantitative Analysis is an analysis method that attempts to understand the behavior of a security/sector by using complex mathematical and statistical modeling. It can be used for performance evaluation, valuation of an instrument, or in an attempt to predict market events.

   RISKS: The most common problem in quantitative assessment is that there is not enough data to analyze. There can also be challenges in revealing the subject of the evaluation with numerical values or the number of relevant variables is too high. This makes risk analysis technically difficult.

4. **Efficient Market Analysis:**

   Market efficiency refers to the degree to which market prices reflect all available, relevant information. If markets are efficient, then all information is already incorporated into prices, and so there is no way to "beat" the market because there are no undervalued or overvalued securities available. As part of this analysis, exchange traded funds and mutual funds facilitate active portfolio management by offering investors diverse and efficient tools to express investment views and implement active investment decisions.

   RISKS: The efficient market hypothesis assumes all investors perceive all available information in precisely the same manner. Since investors value stocks differently, it is impossible to determine what a stock should be worth under an efficient market. Furthermore, under the efficient market hypothesis, no investor should ever be able to beat the market or the average annual returns that all investors and funds are able to achieve using their best efforts. This would naturally imply that the absolute best investment strategy is simply to invest in an index fund;

   This would increase or decrease according to the overall level of corporate profitability or losses. However, there are investors who have "beat the market" over time.

5. **Charting:**

   Analyzing securities' performance by displaying the data as part of a graphic. Viewing securities' performance data graphically can help easily visualize how particular investments may perform over time.

   RISKS: There is no guarantee that past trends will reoccur. Individuals can project that, based on a chart, a security will perform one way when there is no guarantee of that performance.

INVESTMENT STRATEGIES

Our specific investment strategies are, as follows:

1. **Long-term investment holdings:**
   This strategy involves holding investments for at least a year.

   RISKS: Adhering to a long-term investment strategy (also referred to as a buy-and-hold strategy) results in missed short-term gains or experiencing losses by holding positions during a down period.

2. **Short-term investment holdings:**
   Selling investment holdings within a year.

   RISKS: Selling/buying too early or too late, which can cause the client to miss out on gains or to experience losses.

3. **Portfolio managers or Subadvisers:**

   Financial advisers can utilize other money managers, portfolio managers, or subadvisers to assist in managing client assets. We perform due diligence on subadvisers and any other adviser partners with whom we have a relationship.

   RISKS: Utilizing a portfolio manager or subadviser means relying on another party's investment decisions and analyses, which may be flawed or inconsistent with the client's objectives. Portfolio managers and subadvisers invest in securities and that means there is a potential for losses.

4. **Asset allocation:**

   Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets among different asset classes according to an individual's goals, risk tolerance, and investment horizon. The asset classes typically include equities, fixed income, private market investments, and cash and cash equivalents.

   RISKS: Each asset class has different levels of risk and return, so each will behave differently over time. There is no guarantee that diversification among asset classes will grow a portfolio.

5. **Margin transactions:**

   Margin trading refers to the practice of using borrowed funds from a broker to trade a financial asset, which forms the collateral for the loan from the broker.

RISKS: The client can lose more funds than they deposit in the margin account. The client can be forced to sell the securities in their account (without being contacted first) if the equity in the account falls below the maintenance margin requirements proscribed by law – the securities will be sold to cover the margin call. Interest rate costs can be high on open short positions.

6. **Options transactions:**

   Options are a form of derivative contract that gives buyers of the contracts (the option holders) the right (but not the obligation) to buy or sell a security at a chosen price at some point in the future. Option buyers are charged an amount, called a premium, by the sellers for such a right. Should market prices be unfavorable for option holders, they will let the option expire worthless and not exercise this right, ensuring that potential losses are not higher than the premium. Alternatively, if the market moves in the direction that makes this right more valuable, the option holder generally exercises this right.

   RISKS: Significant financial losses. As an options holder, the client risks the entire amount of the premium they pay. But as an options writer, the client takes on a much higher level of risk. For example, if the client writes an uncovered call, they face unlimited potential loss, since there is no cap on how high a stock price can rise.

7. **Structure products:**

   Structured products are securities derived from, or based on, a single security, a basket of securities, an index, a commodity, a debt issuance, and/or a foreign currency. There are various types of structured products, and each involves many risks as summarized in the offering documents prepared by the securities issuer or sponsor. Please refer to the private placement memorandum, offering circular, or prospectus ("PPM") for important information, including, for example, state-specific suitability requirements and investment risk disclosures. Some investment risks are summarized in the PPM; however, it's important for the client to understand that structured products carry additional risk.

   RISKS: A structured product is an unsecured obligation of an issuer with a return, generally paid at maturity, that is linked to the performance of an underlying asset. Structured products are designed to be held to maturity. However, the value of your structured product at any time prior to maturity may be more or less than your initial investment. Structured products are derivatives, which means the return of a structured product will depend on the performance of the underlying asset and the specific features of the investment. Purchasing structured products involves derivatives and a higher degree of risk that may not be suitable for all investors. Structured products are not designed to be actively traded and liquidity is limited. You may or may not be able to sell your investment. As such, you should be prepared to hold your structured products until maturity. Features and risks of structured

products can affect terms at issuance, returns at maturity, and the value of the structured product before maturity. Structured Products run the risk of unanticipated market developments, issuer credit quality risk, risk of counterparty or issuer default, risk of lack of uniform standard pricing, risk of adverse events involving any underlying reference obligations, entity or other measure, risk of high volatility, and risk of illiquidity or little to no secondary market. Investors may lose their entire investment, i.e., incur an unlimited loss. Structured products can be extremely illiquid and charge higher fees than other investments and products. The tax treatment of many structured products is uncertain. The offering documents will describe what the issuer reasonably believes are the potential tax consequences; however, the IRS could arrive at a different conclusion. Clients should consult their tax professional prior to investing in a structured product.

8. **Private funds:**

   A private investment fund is an investment company that does not solicit capital from retail investors or the general public. Members of a private investment company typically have a deep knowledge of the industry as well as investments elsewhere.

   RISKS: Liquidity risk exists since private equity investors are expected to invest their funds with the private fund for several years, on average. Market risk is prevalent as well, since many of the companies invested in are unproven, which can lead to losses if they fail to perform.

ANALYSIS TOOLS

We rely on various resources, such as Morningstar Direct, to review specific investments or products that meet the client's goals and objectives. Models are based on efficient market analysis, with most information gleaned from exchange-traded funds and mutual funds.

PORTFOLIOS AND MODELS

We create portfolios designed by reviewing the available universe of public securities and then tailoring the portfolio based on economic factors as deemed appropriate by the firm in meeting the portfolio's objectives.

GENERAL INVESTMENT RISKS

All investment programs have certain risks that are borne by the client and investing in securities involves risk of loss that clients should be prepared to bear. Our goal is to reduce the risk of loss, but not at the expense of portfolio growth. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. To manage risk, we rebalance model portfolios on an as needed basis to bring the asset allocations back to their intended balances. The client should feel free to ask questions about risks that he or she does not understand; we would be pleased to discuss them.

RECOMMENDED SECURITIES

We use several types of securities in client portfolios including, but not limited to, mutual funds, ETFs, bonds, private market investments, and stocks. Some of the risks associated with these securities include:

- **Credit risk:** The risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.

- **Inflation Risk:** The risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.

- **Interest Rate Risk:** The risk that bond prices will decline because of rising interest rates.

- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social, or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, which differ from those of the U.S.

- **Manager Risk:** The risk that the proportions allocated to the various securities will cause the client's account to underperform relative to benchmarks or other accounts with a similar investment objective.

- **Stock Market Risk:** The risk that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the client's evaluation of the firm and the firm's supervised individuals who provide investment advice. We have no disciplinary events to disclose.

Item 10 - Other Financial Industry Activities and Affiliations

Insurance Affiliations

Innovia Wealth is affiliated with an insurance agency, Thomas Brady & Associates ("Thomas Brady" or the "Agency"). Thomas Brady is a non-affiliated insurance agency with its principal place of business in Boston, Massachusetts. The Agency maintains non-resident licenses in the states necessary to service clients, including Michigan. We recognize the importance of having a well-rounded financial portfolio and for many clients that includes insurance. Thomas Brady works with those clients who have a need for insurance products and solicits or sells the insurance product that meets their needs. This includes life insurance and fixed annuities. Innovia Wealth has a commission sharing agreement with Thomas Brady whereby we receive fifty percent (50%) of the commission generated by the sale of the insurance product. As a result, this relationship creates a potential conflict of interest that the client should know about and understand. We have an incentive to refer clients to Thomas Brady because our firm and one of our employees get paid more if we do. However, the client is not obligated to work with Thomas Brady and, in fact, not all our clients do. The client is also not required to purchase the insurance products Thomas Brady recommends: the client can decide not to purchase the insurance products, or they may purchase the recommended insurance products through any licensed agent. We believe our needs-based analysis helps mitigate this conflict. We must act in the client's best interest.

Limited Liability Company Membership

As discussed above, Innovia Wealth is affiliated with a private equity fund, Strategies+ TRM, a Delaware limited liability company. Innovia Wealth serves as the adviser to Strategies+ TRM. The Fund is a very specific offering and is not appropriate or desirable for all clients. Specific information related to Strategies+ TRM is available in the Fund's offering documents.

Custodial and Brokerage Affiliations

Innovia Wealth maintains relationships with several custodians for the purpose of holding client investments and executing client transactions. A detailed description of these relationships is found in **Item 13 Brokerage Practices**, below.

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

DESCRIPTION

Innovia Wealth has adopted a code of ethics (the "Code") establishing rules of conduct for all employees, officers, and directors of the investment advisory entity and is designed to, among other things, govern personal securities trading activities in the accounts of associated persons. The Code is based on the principle that Innovia Wealth and its employees, officers, and directors owe a fiduciary duty to all of our clients and will conduct their financial affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility. A copy of the Code is available to any client or prospective client upon request.

General Standards of Business Conduct: Insider Trading

The Code was developed to provide general ethical guidelines and specific instructions regarding the duties owed to advisory Clients. All access persons must act with competence, dignity, integrity, and in an ethical manner when dealing with

Clients, the public, prospects, third-party service providers, and fellow access persons. Access persons must use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, trading, promoting Innovia Wealth's services, and engaging in other professional activities. All access persons are expected to adhere to the highest standards with respect to any potential conflicts of interest with Clients. As a fiduciary, Innovia Wealth must act in its clients' best interests. In addition, and in compliance with Section 204A of the Advisers Act, and Rule 204-2 thereunder, Innovia Wealth has adopted written policies and procedures that are embodied in the Code, which are designed to detect and prevent the misuse of material, nonpublic information.

Personal Securities Transactions of "Access Persons"

Through its professional activities, Innovia Wealth and its supervised persons are exposed to potential conflicts of interest. The Code contains provisions designed to mitigate certain of these potential conflicts by governing the personal securities transactions of certain of its employees, officers, and directors. In particular, the Code governs the conduct of so-called "access persons" in instances, among others, where Innovia Wealth or certain individuals associated with Innovia Wealth may desire to purchase or sell securities for their personal accounts that are identical to those recommended by Innovia Wealth to its Clients. For these purposes, the Code defines an "access person" as an employee of Innovia Wealth that (i) has access to nonpublic information regarding any Client's purchase or sale of securities, (ii) has access to nonpublic information regarding the portfolio holdings of any fund the adviser or its control affiliates manage, or (iii) is involved in making securities recommendations (or has access to such recommendations) to Clients that are nonpublic. Access persons' trades must be executed in a manner consistent with the following principles: (i) the interests of Client accounts will at all times be placed first; (ii) all personal securities transactions will be conducted in such manner as to avoid any actual or potential conflict of interest or any abuse of an individual's position of trust and responsibility; and (iii) access persons must not take inappropriate advantage of their positions. In addition, the Code requires pre-clearance of transactions in securities in an initial public offering and in any securities in a limited offering or private placement. No access persons are investment managers or general partners of a private fund. Access persons must disclose all their personal securities accounts and those of immediate family members and provide electronic activity data feeds or provide monthly statements for all disclosed accounts. Innovia Wealth monitors access persons' personal trading activity at least quarterly to ensure compliance with internal control policies and procedures. Innovia Wealth strives to ensure that all access persons act in accordance with applicable regulations governing registered investment advisory practices as they apply to Innovia Wealth. All Access persons must acknowledge their understanding of the Code and its related procedures, annually. Any access person not in observance of this requirement is subject to sanctions, including termination of employment.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

The Code does not prevent or prohibit access persons from trading in securities that Innovia Wealth recommends, or in which Innovia Wealth invests client assets. Rather, it prescribes the principles that must govern all access persons' personal trading activities as described above. As such, it is possible that (i) Innovia Wealth and its advisory personnel could recommend to clients, or buy or sell for client accounts, securities in which one or more access persons (or Innovia Wealth) has a material financial interest, (ii) access persons (or Innovia Wealth) could invest in the same securities (or related securities) that Innovia Wealth or its advisory personnel recommends to clients, or (iii) Innovia Wealth or its advisory personnel could recommend securities to clients, or buy or sell securities for client accounts, at or about the same time that one or more access persons buys or sells the same securities for their own account.

This presents a potential conflict of interest in that the access person might seek to benefit himself or herself from this type of trading activity in the same securities, either by trading for personal accounts in advance of client trading activity, or otherwise. These types of potential conflicts are precisely why Innovia Wealth has articulated clear principles regarding such conduct and has required the submission of regular reports regarding personal securities transactions of its access persons. As noted above, conduct by an access person that is contrary to the Code subjects the access person to possible sanctions including, in appropriate cases, termination of employment. Innovia Wealth's policy is that all client transactions must be placed ahead of our access persons' personal trades. We may include access persons' personal trades as part of a block trade (please see **Item 11** for details on our trading aggregation practices) because trades are placed simultaneously, and access persons' trades are not placed ahead of client trades.

Item 12 - Brokerage Practices

As part of obtaining services from Innovia Wealth, the client must open and maintain an account with a qualified custodian, generally a broker-dealer. These custodians will hold client assets in a brokerage account and buy and sell securities when we instruct them to. Innovia Wealth is independently owned and operated and is not affiliated with any of these custodians. The roles of Innovia Wealth and the custodian are different, although we work together to help the client achieve their goals. Innovia Wealth does not maintain physical custody of client assets that we manage, although we may be deemed to have custody of a client's assets if they give us authority to withdraw assets from their account (see **Item 16 Custody**).

We recommend the following broker-dealers/custodians to our clients: Fidelity Institutional ("Fidelity") or Charles Schwab & Co., Inc. ("Schwab"), which are FINRA-registered broker-dealers, SIPC members, and act as qualified custodians.

While we recommend Fidelity and Schwab as custodians, the client has a choice as to which of these custodians the client wants to use. The client will complete custodial paperwork which will allow them to open an account with the selected custodian. If the client does not wish to open an account at Fidelity or Schwab, we cannot manage their account. Most of Innovia Wealth's clients are custodied at Fidelity.

DIRECTED BROKERAGE

If the client directs us to use a specific broker-dealer to execute securities transactions for their accounts, it is important that the client understand we may not be able to effectively negotiate lower brokerage commissions or achieve best execution on those transactions. This can result in substantially higher fees, charges, or dealer concessions in one or more transactions for the clients' accounts because we cannot negotiate favorable prices.

TRADE AGGREGATION

We may aggregate the client's transactions in equity and fixed income securities with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions are averaged, and each client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. We may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, the liquidity of the securities, or the discretionary or non-discretionary nature of the trades. If we do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost the client more money.

CUSTODIAN INFORMATION

How we Select Brokers/Custodians to Recommend

We seek to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including, but not limited to:

- Combination of transaction executions services along with asset custody services (generally without a separate fee for custody).
- Capability to execute, clear, and settle trades (buy and sell securities for the client's account).
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.);
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange-trades funds (ETFs), etc.);
- Availability of investment research and tools that assist us in making investment decisions;
- Quality of services;
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them;
- Reputation, financial strength, and stability of the provider;
- Their prior service to us and our clients; and
- Availability of other products and services that benefit us, as discussed below (see "Products and Services Available to Us from Schwab").

CUSTODIAN SPECIFIC DISCLOSURES

Fidelity

We recommend Fidelity for several reasons: customer service, product offerings, execution services, vendor integrations, trading capabilities, and ease of doing business. It is possible that the client could pay higher fees, commissions, or transaction costs through Fidelity.

However, we believe that utilizing Fidelity benefits the client because we have economies of scale and, as a result, can obtain better services for our clients than we would otherwise.

Products and Services Available to us from Fidelity

Fidelity makes available various support services. Some of these services help us manage or administer our client accounts, while others help us manage and grow our business. Fidelity's support services are generally available at no additional cost to us. The following is a detailed description of the support services we receive from Fidelity.

Services that benefit you

Fidelity institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Fidelity include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Fidelity's services described in this paragraph generally benefit you and your account.

Services that do not directly benefit you

Fidelity also makes available to us other products and services that do not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts and operating our firm. They include investment research, both Fidelity's own and that of third parties. We use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Fidelity.

In addition to investment research, Fidelity's institutional platform services that assist us in managing and administering clients' accounts include software and other technology that:

- Provides access to client account data (such as trade confirmations and account statements);
- Facilitates trade execution and allocates aggregated trade orders for multiple client accounts;
- Provides research, pricing, and other market data;
- Facilitates payment of fees from clients' accounts; and
- Assists with back-office functions, recordkeeping, and client reporting.

Services that Benefit Only Us

Fidelity also offers other services intended to help us manage and further develop our advisory practice. Such services include third party research, publications, educational conferences and events, practice management resources, business entertainment events for our personnel, and access to consultants and other third-party service providers who provide a wide array of business-related services and technology with whom we may contract directly.

Fidelity provides some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Fidelity also discounts or waives its fees for some of these services or pays all or a part of a third party's fees. Fidelity also provides us with other benefits, such as occasional business entertainment for our personnel. If you did not maintain your account with Fidelity, we would be required to pay for these services from our own resources.

We do not accept these services as an ongoing or perpetual arrangement; each instance is an individually discussed finite arrangement. Our CCO reviews the arrangement to ensure it is not excessive or unreasonable and that we properly disclose the arrangement for our clients' benefit.

The fact that we receive these benefits from Fidelity is an incentive for us to recommend the use of Fidelity rather than making such decision based exclusively on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a conflict of interest. We believe, however, that taken in the aggregate, our recommendation of Fidelity as a custodian and broker is in the best interest of our clients. Our selection is primarily supported by the scope, quality, and price of Fidelity's services and not Fidelity's services that benefit only us.

We have relationships with other custodians, as referenced below, and we periodically review other relationships and options. However, we believe that excellent customer service and trade execution is superior to most non-service oriented, deep-discount, and internet-based brokers that may otherwise be available to the public. Fidelity's products, services, and relationship support align with our investment and business philosophy.

Schwab

For our client accounts it maintains, Schwab generally does not charge the client separately for custody services; rather, Schwab is compensated by charging the client commissions or other fees on trades that it executes or that settle into the Schwab account. In addition to commissions, Schwab charges the client a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into the client's Schwab account. These fees are in addition to the commissions or other compensation the client pays the executing broker-dealer. Because of this, and to minimize the client's trading costs, we have Schwab execute most trades for the account.

Schwab Advisor Services™ (formerly Schwab Institutional) is Schwab's business serving independent registered investment advisor firms like us.

They provide our clients and us with access to its institutional brokerage services—trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business.

Services That Benefit the Client

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit the client and the client's account.

Services That May Not Directly Benefit the Client

Schwab also makes available to us other products and services that benefit us but may not directly benefit the client or the client's account. These products and services may assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- Provides access to client account data (such as duplicate trade confirmations and account statements);
- Facilitates trade execution and allocates aggregated trade orders for multiple client accounts;
- Provides pricing and other market data;
- Facilitates payment of our fees from our clients' accounts; and
- Assists with back-office functions, recordkeeping, and client reporting.

Services That Generally Benefit Only Us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events;
- Technology, compliance, legal, and business consulting;
- Publications and conferences on practice management and business succession; and
- Access to employee benefits providers, human capital consultants, and insurance providers.

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

RESEARCH AND SOFT DOLLARS

Research Services

Our firm has an agreement with Cornerstone Portfolio Research ("Cornerstone") for Cornerstone to provide non-discretionary investment advice and portfolio holding recommendations. Cornerstone is an investment adviser; however, Cornerstone has no direct access to the client accounts and no discretion to engage in trading or making any adjustments to their investment holdings. On a monthly basis, Cornerstone provides research and data to our firm aimed at recommending investment holdings based on our firm's investment philosophies, our clients' investment objectives, market research, and investment analysis. Our firm will, at all times, have discretion and can choose to implement or not implement Cornerstone's recommendations based on our own analysis and determinations.

Cornerstone provides our firm with services that include, but are not limited to, developing investment policy statements, conducting due diligence, and screening potential investment holdings, rebalancing accounts, attending investment committee meetings, providing investment adviser representative education, and consolidating and integrating our firm's investment strategies and philosophies among our internal investment team. Clients do not pay any additional fees for Cornerstone's services. Innovia Wealth pays a monthly fee separate and distinct from our clients' investment management fees in an effort to obtain additional investment and market research and knowledge.

Soft Dollars

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services, such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm can, in return, agree to use some of its revenue to pay for these types of services. Section 28(e) of the Securities Exchange Act of 1934, as amended (the "Exchange Act"), provides a "safe harbor" to investment advisers with respect to potential liability for violating their duty to obtain best execution for a client's securities transactions in circumstances in which the adviser uses soft dollars generated by their advised accounts only for purposes of obtaining investment research and brokerage services (i) that provide lawful and appropriate assistance to the investment adviser in the performance of investment decision making responsibilities and (ii) where the commissions paid are reasonable in relation to the value of the services provided.

Brokerage for Client Referrals

We do not receive client referrals or any other incentive from any broker-dealer or custodian.

Item 13 - Review of Accounts

PERIODIC REVIEWS

Innovia Wealth's financial professionals review our investment strategies and key partners and relationships as part of our ongoing business process.

We understand reviewing client accounts and investment holdings is an integral part of helping clients achieve their financial goals. The frequency and nature of our client reviews may vary based on the services chosen, the complexity of each client's financial plan, and the client's meeting-frequency preference. Financial professionals generally perform comprehensive client account reviews at least annually. Reviews may be conducted more frequently through various means, such as telephone conferences, remote meetings, email correspondence, and in-person meetings, as needed.

OTHER REVIEWS

Additional reviews are conducted periodically depending on market conditions, economic or political events, or changes in a client's financial situation (such as retirement, termination of employment, physical move, or inheritance).

FINANCIAL PLANS

Financial planning clients receive a comprehensive financial plan. If the client engages in financial planning services, the frequency and format of the plan review will depend on the terms of their Financial Planning Agreement. As part of these reviews, our financial professionals will revisit the original financial plan and determine whether adjustments need to be made based on the client's needs and their current financial circumstances.

Item 14 - Client Referrals and Other Compensation

This section of our brochure discusses certain arrangements Innovia Wealth has with third parties, as well as certain other compensation and benefits we may receive from third parties while conducting business. Generally, Innovia Wealth does not receive compensation for referrals. However, there are some scenarios related to referrals and our firm's compensation that we want clients to know about.

CUSTODIAN BENEFITS

We receive an economic benefit from Fidelity in the form of support products and services it makes available to us and other independent investment advisers whose clients maintain their accounts at Fidelity. We benefit from Fidelity providing and paying for these products and services because otherwise, we would be solely responsible for paying these costs. This creates a conflict of interest because we have an incentive to place additional business with Fidelity to receive these support products and services. These products and services, how they benefit us, and the related conflicts of interest are described above (see **Item 12 Brokerage Practices**).

We neither pay nor receive compensation for referrals; however, we receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see **Item 12 Brokerage Practices**). The availability of Schwab's products and services to us is not based on our giving investment advice, such as buying particular securities for our clients.

PROMOTERS – CLIENT REFERRALS

Innovia pays certain individuals ("Promoters") cash and/or non-cash compensation for referring clients to our firm. This compensation constitutes a conflict of interest because the Promoter has an incentive to refer you to us.

The Investment Adviser's Act of 1940, as amended (the "Advisers Act") requires that we inform you of any compensated testimonials or endorsements. A testimonial is any statement by a client that indicates approval, support, or a recommendation of an adviser or its supervised persons or describes an experience with the adviser or its supervised persons. An endorsement is the same statement made by a non-client. Innovia compensates both clients and non-clients for referrals. Innovia enters into agreements with its Promoters, as required under applicable rules and regulations.

Any time compensation is provided in exchange for a referral, a conflict of interest exists. A conflict of interest is any circumstance that could influence a professional – consciously or unconsciously – to make a recommendation or render advice that is not disinterested. By compensating the Promoter, Promoter has an incentive to recommend you to our firm, resulting in a material conflict of interest. We will not increase your fee or assess any additional fees based on our promoter arrangements. Compensation is provided out of Innovia's portion of fees.

Promoters are not permitted to provide investment advisory services on behalf of Innovia. Promoter will provide a referred client with a Promoter Disclosure Statement at the time of solicitation.

Third-Party Solicitation Arrangements

Innovia Wealth, by and through its financial advisers, solicits for Sentinel Benefits & Financial Group ("SBFG"), which is an investment adviser to qualified plans. Innovia Wealth receives a portion of SBFG's fee when a client uses its services. This creates a financial incentive to recommend SBFG's services. The client is not required to accept any recommendations. Innovia Wealth believes the client's ability to reject the recommendation, in conjunction with disclosing the compensation arrangement to the client, helps mitigate the conflict of interest. At all times, the client's best interests dictate our recommendations and actions.

Third-Party Vendor Relationships

Innovia Wealth maintains relationships with certain third-party vendors, including GLASfunds, a private equity investment platform. Innovia Wealth personnel receive non-cash compensation from its vendors, which includes reimbursement or payment for travel, lodging, meals, entertainment, or participation in conferences and other events. This creates a conflict of interest, as these benefits create an incentive for Innovia Wealth or its personnel to promote the vendor providing the incentive or recommend investments on the GLASfunds platform over other platform options in order to continue receiving non-cash compensation benefits. To mitigate this conflict, we ensure all investment recommendations are based on an independent analysis consistent with each client's best interests. Additionally, we review vendor relationships regularly through our compliance program and personnel receiving cash and non-cash compensation are required to report such receipt to the chief compliance officer for review and monitoring.

Item 15 - Custody

Custodian Deducted Fees

Innovia Wealth does not directly hold client funds or securities. All client funds, securities and accounts are held by third-party qualified custodians. However, we are deemed to have constructive custody of client funds in accordance with Advisers Act Rule 206(4)-2 due to our ability to direct the custodian to directly debit client accounts for investment advisory fees. Clients will receive statements on the same frequency as their billing cycle – currently, monthly. The statement will show the amount of management fees withdrawn. We urge each client to carefully review such statements and compare any reports they might receive from us with their official custodial report.

We generally avoid obtaining the authority to hold or obtain possession of client funds or securities in connection with the advisory services we provide to clients. We do have custody in the following ways:

Family Office Service; Standing Letters of Authorization

As described above in "Item 4: Investment Advisory Business," the firm provides "Family Office Services" to certain clients. As part of this segment of the business, the firm provides bill paying services, and assists with asset movement requests from clients. In carrying out the activities of the Family Office Services, firm employees have full electronic access (rather than limited, "trading-only," or "read-only" access) to certain clients' bank accounts and securities accounts for purposes of entering transactions. This is considered "custody" of client assets. We have various controls in place to monitor and supervise such activity. In addition, we engaged a third-party accounting firm to conduct surprise exams of the applicable client accounts, as required by SEC rules.

We assist some clients with the ability to move money from one account to another. In these situations, clients sign standing letters of authorization ("SLOAs") with their custodian that grant us the ability to facilitate the transfer. When client money is transferred between accounts with different titles, this is considered a limited form of custody. In 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). We, and the custodians, utilize the safeguards outlined in the letter. These safeguards include, but are not limited to:

- The client provides an instruction to the qualified custodian, in writing, which includes their 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.
- The client authorizes us, as their 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.

- 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 them promptly after each transfer.
- The client can terminate or change the instruction provided to their qualified custodian.
- As the client’s investment adviser, we have 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 their instruction.
- We maintain records showing that the third party is not a related party of Innovia Wealth or located at the same address as us.
- The client’s qualified custodian sends them, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 - Investment Discretion

We offer discretionary investment management services. To grant us discretionary authority over the account, the client must sign an investment management agreement. Our investment management agreement contains a limited power of attorney that allows us to select the security, the amount, and the time of the purchase or sale in the client’s account. It also allows us to place each such trade without the client’s prior approval. In addition to our investment management agreement, the client’s custodian may request the client to sign the custodian’s limited power of attorney. This varies with each custodian. The client may limit our discretionary authority by providing us with written instructions and after our written acknowledgement of the constraints.

Item 17 - Voting Client Securities

Innovia Wealth does not directly vote proxies. We do utilize certain proxy advisory firms for some, but not all, asset managers, including Aperio (a wholly owned subsidiary of BlackRock, Inc.) This creates a conflict of interest because this service is available to certain clients but not others. However, our choice to utilize a proxy advisory firm is determined by a number of factors, including the following: the proxy advisory firm’s process, policies, and methodologies; the cost to clients; and the proxy advisory firm’s ability to collect relevant information and address any conflicts of interest. We mitigate this conflict of interest by engaging proxy voting advisory services that are in our clients’ best interest.

Item 18 - Financial Information

Innovia Wealth is not required to include a balance sheet for our most recent fiscal year end because we do not engage in any activities that would trigger the requirement.

- We do not require or solicit prepayment of more than $1,200 in fees per client, six months or more in advance.

- We do not have a financial commitment that impairs our ability to service the client.
- We do not have a financial commitment that impairs our ability to meet contractual commitments or our fiduciary obligation to clients.
- We have not been the subject of bankruptcy proceedings during the past ten (10) years.