ITEM 1 – COVER PAGE ADV PART 2 A

Radix Wealth LLC

RADIX WEALTH LLC
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This brochure provides information about Radix Wealth LLC's ("Radix Wealth," "we," "our," "us") qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at 602-837-4014. 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. Registration as an investment adviser does not imply any certain level of skill or training.

Additional information about Radix Wealth is also available at the SEC's website www.adviserinfo.sec.gov (select "investment adviser firm" and type in our firm name or our CRD number, which Is 328329).

ITEM 2 – MATERIAL CHANGES

We use this section to advise clients and prospective clients of any material changes to our firm Brochure ("Brochure") from the last version provided. We are a newly registered investment adviser, and this is our first Brochure. In the future, we will use this section to identify material changes as they take place, and between annual updates, as required.

Clients will receive an annual summary of any material changes to this and subsequent Brochures no later than 120 days after our fiscal year-end of December 31. At that time, we will offer a copy of our most current Brochure. We will also promptly provide ongoing disclosure information about material changes, as necessary.

Since our initial registration, and subsequent to filing our annual updating amendment in March of 2024, we have made the following material changes to this Brochure:

- We previously disclosed our relationship with The Boyle Group Wealth Management, a state-registered investment adviser owned by one of our investment adviser representatives. That firm has submitted a request to withdraw its registration as an investment adviser, and is no longer in business. Accordingly, we have removed references to that firm and the conflicts of interest related to the relationship.
- The owners of Radix Wealth have formed a licensed insurance agency, Kierland Insurance Services LLC. Boyle Group Insurance Services, which is owned by an advisory representative of Radix Wealth, will continue to service contracts and receive continuing commissions for insurance contracts previously written. New insurance business, however, will go through Kierland Insurance Services. Please see *Item 5 – Fees and Compensation*, and *Item 10 – Other Financial Industry Activities and Affiliations*, for more information.
- We now offer direct indexing through a sub-advisory relationship with First Trust Direct Indexing, L.P., an unaffiliated registered investment adviser. Where we recommend that clients use this service, they will incur additional fees. The service is not appropriate for all clients. See *Item 4 – Advisory Business*, *Item 5 – Fees and Compensation*, and *Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss* for more information.

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ITEM 4 – ADVISORY BUSINESS

Firm Description

Radix Wealth is an Arizona limited liability company formed in April of 2023. The firm became registered as investment adviser in its home state of Arizona in 2023 and registers in additional juridisctions as required by the laws of the applicable state of client residence. The firm is principally owned by Jennifer Burke (50%) and Danielle Kvesic (31%), both of whom are also managers of the company. Jennifer and Danielle are also investment adviser representatives and Danielle Kvesic serves as Chief Compliance Officer.

Types of Advisory Services

Investment Management

Radix Wealth offers a variety of investment advisory services to our clients. We work with our clients to identify their investment goals and objectives as well as risk tolerance in order to create an initial portfolio allocation designed to complement their clients' financial goals and objectives. We may create a portfolio consisting of, but not limited to, individual stocks or bonds, exchange traded funds, no-load funds and/or load-waived funds (front-end commissions will not be charged). Depending on client needs, we may also provide financial planning services in connection with our investment management, but when we do so, we do not charge a separate fee for financial planning.

Each portfolio will be initially designed to meet a particular investment goal, which Radix Wealth has determined to be appropriate for the client's circumstances. Once the portfolio has been constructed, we will review the portfolio and rebalance the account based upon the client's individual needs, stated goals and objectives. Radix Wealth's strategy, generally, will be to seek to meet client investment objectives while providing clients with access to personal advisory services. Radix Wealth may also provide advice about any type of legacy position or other investment held in client portfolios.

We provide continuous and regular supervision and management of your account(s) on a discretionary basis, which means we do not need your approval to execute transactions in your managed account(s). The investment management agreement clients execute grants us limited authority to invest and reinvest the assets held in the accounts under our management.

Direct Indexing

We may recommend that clients with large legacy stock positions, or clients with tax situations that could benefit from generation of capital losses from their stock portfolios, make use of a direct indexing strategy advised by First Trust Direct Indexing, LP ("First Trust"). First Trust is an unaffiliated registered investment adviser that designs and manages portfolios of public equities. These portfolios track chosen equity benchmarks and may be personalized to other client-specific needs. Generally, direct indexing involves sampling a representative subset of the securities that make up a given index or other benchmark, rather than owning all of the securities in the index. The process used is designed to closely track the index but there will be variations in performance, known as "tracking error" (see *Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss* for more information). Owning a portfolio of securities designed to track a particular benchmark can provide similar investment results to owning an index ETF or mutual fund, while also providing additional tax benefits and the ability to further customize the account, for example by excluding certain securities or sectors. First Trust also monitors the portfolio for opportunities to harvest tax losses. Where we recommend Direct Indexing, clients will receive a copy of First Trust's ADV 2A disclosure brochure, which provides additional information on First Trust's services, fees, and conflicts of interest, and well as additional details on their investment process and the associated risks. See *Item 5 – Fees and Compensation*, for information on the additional charges that apply to direct indexing. Clients will not, however, enter into an agreement with First Trust. Radix will continue to be the point of contact and Radix retains the ability to hire and fire First Trust.

Client Tailored Relationships and Restrictions

As a fiduciary, Radix Wealth places your interests ahead of its own and always acts in your best interests. Your portfolio is customized based on your investment objectives, risk tolerance, and other factors specific to your situation. We are happy to accommodate reasonable client requests or restrictions in our portfolio construction. We are not able to accept restrictions that we believe, in our sole judgment, are too operationally onerous to administer or that we believe will not serve the client's best interest or are inconsistent with the fiduciary duty we owe to clients. If we cannot come to agreement with clients about reasonable restriction, we will decline the advisory agreement. Any client-imposed restrictions will be documented in writing.

Retirement Investors

When we recommend that you roll over retirement assets or transfer existing retirement assets (such as a 401(k) or an IRA) to our management, we have a conflict of interest. This is because we will generally earn additional revenue when we manage more assets. In making the recommendation, however, we do so only after determining that the recommendation is in your best interest. Further, in making any recommendation to transfer or rollover retirement assets, we do so as a "fiduciary," as that term is defined in ERISA or the Internal Revenue Code, or both. We also acknowledge we are a fiduciary under ERISA or the Internal Revenue Code with respect to our ongoing investment advisory recommendations and discretionary asset management services, as described in the advisory agreement we execute with you. To the extent we provide non-fiduciary ERISA or IRS Code services to you, those will be described in the advisory agreement.

Wrap Fee Program

Radix Wealth does not sponsor nor provide portfolio management services to a wrap fee program.

Assets under Management (AUM)

As of April 15, 2024, we managed client assets totaling $55,492,992, all on a discretionary basis, and $0 on a non-discretionary basis.

ITEM 5 – FEES AND COMPENSATION

Investment Management—Standard Fee Schedule

Assets Under Management	**Annual Fee (%)**
First $500,000	0.95%
$500,001 and above	0.85%

The fee schedule above represents the maximum fees charged by Radix Wealth. Our fees are negotiable, however, and we will often agree to lower our fees based on factors such as the total amount of assets managed, the relative complexity of the relationship, and whether the client was paying lower fees with a prior adviser. Clients can combine multiple household accounts to qualify for lower fees in accordance with the above schedule. Our investment management fees are billed quarterly in advance (prior to the services being provided), and are deducted directly from the custodial account holding your assets pursuant to the investment advisory agreement between us. If there is insufficient cash in the account to cover fees due to us, we will use our discretionary authority to liquidate adequate securities to pay the fees owed. Fees are calculated using the market value of your account assets on the last day of each calendar quarter, multiplied by the quarterly fee rate (e.g., 0.95%/4 = 0.2375%). Accounts with assets in excess of $500,000 will be charged a blended rate based on the above schedule, with the first $500,000 charged at the higher rate shown, and all assets above $500,000 charged at the lower rate shown. Static or non-managed assets are not included in the management fee calculation. Radix Wealth does not price securities or otherwise determine the value of securities for billing purposes. Instead, we rely on the values provided by our third-party asset management platform, which uses the last reported sale price on the principal market in which the security is traded. This pricing methodology may differ slightly from the methodology used by the custodian holding your assets. We may modify the terms of our agreement by written agreement of both the client and Radix Wealth, and changes will not be effective until after they have been agreed to by both parties.

While we strive to maintain competitive fees, the same or similar services may be available from other firms at higher or lower fees. Our fees are negotiable.

Direct Indexing Fees

Clients who agree to use First Trust for direct indexing will pay additional asset-based fees of 30 basis points per year (.003 annually/.00075 quarterly), and will be subject to an annual per account minimum of $1,500 assessed by First Trust. Technology advancement has made it possible to provide the benefits of direct indexing at lower cost than was previously available, though the cost remains higher than simply purchasing an index fund or ETF. Clients are subject to both Radix Wealth’s advisory fee and

First Trust's advisory fee on the same set of assets. Because of the minimum annual fee of $1,500, we will generally not recommend direct indexing for any portfolio holding less than $500,000. Portfolios with asset values under $500,000 will pay an effective annual fee that is higher than 30 basis points, as a result of the minimum charge.

Other Professionals

With your consent, we may agree to consult with your other professional advisors, such as lawyers and accountants, to ensure your investment planning is consistent with other areas of your financial life, such as estate and tax plans. Our asset-based advisory fees include the time we spend discussing these matters, as well as implementing investment-related activities that arise from these consultations, such as ensuring accounts are correctly registered. We are not, however, responsible for attorney or accountant fees your other professionals charge you as a result of these activities. See *Item 10, Financial Industry Affiliations*, for information on our relationship Radix Law, which is a minority owner of Radix Wealth.

Radix Wealth requires written authorization from the client to deduct advisory fees from an account held by a qualified custodian. Our fees are paid from your account by the custodian when we submit a payment request to them. At the same time we send the qualified custodian written notice of the amount of the fee to be deducted from the client's account, we also send the client a written invoice generally including the fee charged, the amount of assets under management on which the fee was based, and the time period covered by the fee. Different states have various requirements for the content of the billing statement and may require more detail for clients of their states. We have provided the requirement for our home state of Arizona and clients should refer to their own advisory agreement for the exact content of the billing statement under applicable state requirements. We strongly urge you to compare our invoices with the fees listed in the custodian account statements.

For clients who are Washington State residents only: Each time we charge a fee, we will send the client a written invoice, including the fee, the formula used to calculate the fee, the fee calculation itself, the time period covered by the fee, and, if applicable, the amount of assets under management on which the fee was based. We will also include the name of the custodian(s) on your fee invoice. We will send these to the client concurrent with the request for deduction of advisory fees from clients' custodial accounts. We urge the client to compare this information with the fees listed in the account statement.

In cases where there are partial fees due at the commencement of our agreement, or a refund of pre-paid fees is due to the client in the event the agreement is terminated, they will be billed or refunded on a pro-rata basis using the number of days the account was open during the period. Quarterly fee adjustments for additional assets received into the account during a quarter or for partial withdrawals will also be provided on the above pro rata basis.

In addition to our fees, custodial charges will also apply. See Item 12, Brokerage Practices, for more information. If we select funds or exchange-traded funds for your portfolio, the managers of those funds also charge a management fee that is reflected in the fund's expense ratio and reduces returns over time.

Termination

Clients have the right to terminate our advisory agreement without penalty within five business days after entering into an agreement with us if we do not provide Form ADV Part 2 (this brochure) within 48 hours prior to entering into an Agreement with you. Clients may terminate our services at any time after that by contacting us as described in the advisory agreement.

When an agreement is terminated, we will refund any pre-paid, unearned fees based on the number of days remaining in the quarter after termination. Refunds will be made within 30 calendar days of the effective date of termination.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. The custodian may assess additional fees for transfer of illiquid investments or transfer to a new custodian. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good faith estimate of these fees.

Other Compensation—Insurance Recommendations

Advisory representatives of Radix Wealth are separately licensed to sell insurance. If you choose to purchase insurance through your Radix Wealth insurance-licensed advisor, both Kierland Insurance Services LLC (see Item 10) and the individual insurance producer affiliated with Kierland Insurance Services will receive customary commissions. This creates a conflict of interest based on the individual advisor's (or other insurance producer's) ability to earn additional compensation if you accept the recommendation. Clients are never obligated to accept our insurance recommendations, and they are able to purchase insurance through unaffiliated companies or individuals.

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

Radix Wealth does not charge advisory fees on the performance of funds or securities in your account.

ITEM 7 – TYPES OF CLIENTS

Radix Wealth generally provides asset management and financial planning services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit-Sharing Plans
- Trusts
- Estates
- Charitable or Nonprofit Organizations

- Corporations

Minimum Account Size
Radix Wealth has an account minimum of $100,000. However, in certain conditions, we may decide to accept clients with smaller portfolios. Certain strategies, including direct indexing, generally require higher minimums.

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

Analysis

Radix Wealth uses multiple sources of information to obtain analysis and strategies. They include sources such as financial newspapers, financial magazines, research prepared by others, corporate rating services, prospectuses, company press releases, annual reports, and filings with the SEC.

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

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, in our opinion, 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. Further, our judgment about whether a security is over- or underpriced may simply be wrong.

Technical & Charting Analysis: We analyze past market movements and apply that analysis to the present in an effort to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. There is no guarantee that past patterns of market or security movements will accurately predict future performance. Similarly, a risk of technical analysis is that an over-focus on historical patterns could lead us to ignore or downplay security-specific concerns, overall market or sector concerns, or other factors because we inaccurately assume the historical patterns will repeat themselves.

Cyclical Analysis: In this type of technical analysis, we measure the movements of a particular stock against the overall market in an effort to predict the price movement of the security. This presents a risk because the broad economy has been shown to move in cycles – periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns as compared with the recent past.

Investment Strategies

Radix Wealth utilizes multiple investment strategies to meet your investment objectives. These methodologies are formulated based on a comprehensive review and assessment of your expectations, investment time horizon, risk tolerance level, present investment allocation, and current and projected financial requirements.

Ultimately, each strategy must maximize return within reasonable and prudent levels of risk. Also, the approach taken must provide exposure to a wide range of investment opportunities in various markets while limiting risk exposure through prudent diversification. Finally, the costs of administering and managing the investments related to the strategy cannot be excessive.

Long-Term Purchases: When utilizing this strategy, we may purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically, we employ this sub-strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

Short-Term Purchases: When utilizing this strategy, we may also purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase. The risk in this strategy is that the initial funds invested may be lost if a client is heavily invested in one stock or sector of the market with an incorrect investment or market crash.

Trading: If using this strategy, we purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings. The risk associated with this strategy is that a high volume of trading activity may lead to increased transaction fees, potential negative tax ramifications, and the fact returns are not guaranteed on any transaction and that the market can be volatile.

Options: These involve leverage and special risk considerations. Use of options entails the potential for significant losses and significantly increased portfolio volatility. Options are a wasting asset that eventually expire worthless if they are not exercised, assigned, or closed out prior to expiration. They incur trading costs that are often higher than the costs of other securities. This means that options positions can increase portfolio costs significantly while also expiring worthless and thereby contributing to overall portfolio losses or reductions in return. Radix clients are more likely to be exposed to options as a holding in a mutual fund or ETF, rather than as a direct holding.

Risk of Loss

<u>All investments include a risk of loss, which clients should be prepared to bear.</u> Clients should be aware that there is a material risk of loss using any investment strategy. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. <u>However, we cannot guarantee any level of performance</u>

or that you will not experience financial loss.

General Investment Risks

Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.

Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. Conceptually, they carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not. Certain instruments may have no readily available market or third-party pricing. Reduced liquidity may have an adverse impact on market price and the ability to sell particular securities when necessary to meet cash needs or in response to a specific economic event, such as the deterioration of creditworthiness of an issuer. Reduced liquidity in the secondary market for certain securities may also make it more difficult to obtain market quotations based on actual trades for the purpose of valuing the security. Clients should invest in illiquid (or relatively illiquid) assets only to the extent they have adequate other liquid assets available to fund current and ongoing cash requirements. Annuities are the only product we recommend that is inherently illiquid.

Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Sectors: When a substantial portion of assets are devoted to a particular market sector or industry, there is potential for greater volatility than with broadly diversified strategies. A market sector or industry may underperform the market as a whole for a variety of reasons. Sectors (e.g., financial services, technology, or health care) may over or under-perform as a group and therefore become a larger or smaller portion of an index or a portfolio based solely on market value. Volatility in a sector may, as a result, have more significance on a portfolio when that sector has become over or under-weighted due to related market performance. Regular rebalancing is one way to help limit some of the volatility risk of over-concentration

Tracking Risk: This refers to a product or model that attempts to track the performance of an index, sector, or other benchmark, and the risk that the actual performance will differ materially from the instrument being tracked. This is a risk of index funds and ETFs. In addition, direct indexing generally aims to track specified indexes through selection of a subset of representative securities. The smaller the number of representative securities—versus the selection of all securities in the underlying index—tracking risk will generally increase. A portfolio using direct indexing could deviate substantially from its benchmark. When using direct indexing, we specify a benchmark to follow, made up of one or a combination of indexes available. There may then be further customization, such as client-direct exclusion of specific securities or sectors. Finally, we identify whether there are specific “tilts” in portfolio direction, including value, quality, growth, dividend yield, liquidity, or others made available by First Trust. First Trust then constructs a customized portfolio with the aims of (1) minimizing taxes, (2) minimizing tracking error, and (3) maximizing portfolio tilts. Direct indexing will not produce results identical to the index or indexes the portfolios are tracking.

Direct Indexing Risk: Tracking risk (discussed above). Higher management fees apply to Direct Indexing in the form of per-account minimums and additional asset-based fees, which reduce returns over time. Direct Indexing typically leads to higher trading volume than would occur if the portfolio simply held an index ETF, for example, which could lead to increased trading costs.

Systemic Risk: Risks inherent to the entire market or market segment. Systemic risk is also known as “undiversifiable risk,” and affects the overall market, not just a particular stock or industry. This type of risk is both unpredictable and impossible to completely avoid.

Third Party Risk: It is not uncommon for companies to maintain myriad third-party relationships in an effort to reduce costs, increase efficiency and focus more intently on core competencies. However, while businesses seek to gain a competitive and operational advantage through these relationships, they are also exposing themselves to an increasing level of risk. At the same time, however, it is becoming increasingly difficult for businesses to maintain the necessary controls for mitigating the risks associated with these relationships. Failure to manage these risks can expose a business to regulatory action, financial loss, litigation, and reputational damage, and may even impair the institution’s ability to establish new or service existing customer relationships.

Risks of Specific Investment Types

The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: These are professionally-managed investments that pool money from multiple investors to purchase securities. Mutual funds may be broad-based (e.g., focused on the market overall, or focused on large-capitalization companies), or they can be narrower in scope, such as those focused on the technology industry or the securities of specific country. The risks of mutual funds are generally connected to the risks of the underlying securities they hold. Mutual funds do not trade on an exchange but are priced daily based on the net asset value of the securities held in the fund. Investors buy or sell fund shares based on that end-of-day price.

Exchange Traded Funds (ETFs): ETFs are funds bought and sold on a securities exchange that attempt to track the performance of a specific index (such as the S&P 500), a commodity, or a basket of assets (such as a set of technology-focused, country-specific, or other sector-specific stocks). The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in its being more volatile than the underlying securities. ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: the risk that their prices may not correlate perfectly with changes in the underlying index (tracking error); the lack of transparency in products and increasing complexity; the risk that the ETF will trade at prices that differ, sometimes materially, from the ETF’s net asset value; and illiquidity risk, especially for narrowly-focused ETFs, including the risk of possible trading halts due. Buffer ETFs are exchange traded funds that use options to track the performance of an index. They don't actually own stocks or bonds. Investors forgo some potential returns for protection against some losses. The expense ratios of these ETFs may be fairly high, which will lower returns over time. Over extended periods, they may not perform much differently than a typical balanced portfolio of 60% equities and 40% fixed income. They also may tend to sacrifice upside more than they protect on the downside. We use our judgment to select buffer ETFs that we think offer the most potential value and we tend to use them for shorter periods of time or during periods of particular uncertainty Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Real Estate Investment Trusts (REITS). A *REIT*, or real estate investment trust, is a company that owns – and typically operates – income-producing real estate or real estate-related assets. *Publicly traded REITs* are listed on an exchange and can purchased or sold with relative ease. An investment in publicly traded REITs is typically a liquid investment. *Non-traded REITs* are ***not*** listed on an exchange. Non-traded REITs are illiquid investments, which mean that they cannot be sold readily in the market. Non-traded REITs typically charge high upfront fees to compensate a firm or individual selling the investment and to lower their offering and organizational costs. *Distributions may come from principal.* The initial distributions may not represent earnings from operations since non-traded REITs often declare these distributions prior to acquiring significant assets. Because non-traded REITs are not publicly traded, there is no market price readily available. *Conflicts of interest.* Non-traded REITs are typically externally managed, meaning the REITs do not have their own employees. External managers may manage or be affiliated with other companies that may compete with the REIT in which you are invested or that are paid by the REIT for services provided, such as property management or leasing fees.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Annuities are not short-term products and the insurance company issuing the annuity contract generally pays customary commissions to the licensed insurance producer recommending the annuity. Annuities are usually subject to surrender penalties if the annuity contract is terminated earlier than the date stipulated in the contract. They should be considered illiquid.

Non-U.S. investments present certain additional risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Options transactions involve a contract to purchase or sell a security at a given price, not necessarily at market value, depending on the market. Investments in options contracts have the risk of losing value in a relatively short period of time. This strategy includes the risk that an option may expire out of the money resulting in minimal or no value, as well as the possibility of leveraged loss of trading capital due to the leveraged nature of stock options. Leverage, or borrowing for the purchase of options, can be used to offset risk but can also compound gains or losses.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Radix Wealth will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by Radix Wealth with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any unauthorized act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

ITEM 9 – DISCIPLINARY INFORMATION

This item requires disclosure of specific legal and regulatory matters, as well as other, non-specified matters that would be material to a client's evaluation of Radix Wealth or of its managers. We have nothing to report in response to this item.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

The principal business of Radix Wealth is that of a registered investment advisor and we are not registered as a broker-dealer or other financial industry participant.

Radix Professional Services, LLC dba Radix Law ("Radix Law"), owns approximately 19% of Radix Wealth. Radix Law and Radix Wealth will refer clients to each other, where the other firm is likely to meet the prospective client's needs. The two firms do not, however, share fees or otherwise compensate each other for advisory referrals, but will share insurance commissions where the referring party is insurance licensed. Radix Law, through its ownership interest in Radix Wealth, stands to earn additional money to the extent Radix Wealth is profitable and makes profit distributions to its owners. Lawyers associated with Radix Law who are also insurance-licensed will share in customary commissions if they refer clients to Radix Wealth and the client chooses to purchase insurance products recommended by the Radix Wealth advisor and implemented through a licensed insurance producer associated with Kierland Insurance Services. The common ownership, as well as the potential to share in insurance commissions, creates a conflict of interest when making referrals. We mitigate the conflicts by disclosing them and by informing clients that they are not required to accept referral recommendations or to purchase insurance through their Radix Wealth advisor. Clients are free to use Radix Wealth for investment management and seek unaffiliated attorneys for legal services, as well as unaffiliated insurance agents to implement any insurance advice Radix Wealth provides.

Radix Wealth's owners, Danielle Kvesic and Jennifer Burke, also own a licensed insurance agency, Kierland Insurance Services LLC ("Kierland Insurance"). As discussed in Item 4, above, to the extent clients purchase insurance through a Radix Wealth advisory representative, both the representative and Kierland Insurance will earn customary insurance commissions paid on the transaction. The commission is paid to Kierland Insurance and then Kierland Insurance pays insurance-licensed individuals a variable percentage of the total commission. In all cases, clients are free to accept or reject our insurance advice and are also free to choose an unaffiliated insurance agent or agency to purchase insurance. Tim will be associated with this firm once his resident AZ license is approved.

Timothy Boyle, the firm's President and Chief Investment Officer, owns Boyle Group Insurance Services, LLC, a licensed insurance agency. This agency will continue to service legacy business, but commissions related to new recommendations of insurance products will run through Kierland Insurance.

One of our owners, Danielle Kvesic, is also a licensed real estate agent. She spends approximately five hours per month on this activity. To the extent client of Radix Wealth choose to use Ms. Kvesic for real estate transactions, she will receive customary and separately disclosed commissions. This activity is not part of Radix Wealth's investment advisory services and clients are not required to use for Ms. Kvesic for real estate transactions.

Radix Wealth has entered into a service agreement with NWAM, LLC dba Northwest Asset Management ("NWAM"), an unaffiliated investment adviser. NWAM provides us with back-office support, and fee calculation and invoicing at our direction and in accordance with the advisory agreement we enter into with our clients. A primary benefit of the relationship is that we are able to access qualified custodians, such as Fidelity and Schwab (see Item 12) and obtain beneficial pricing even though we are a small adviser. We are responsible for paying NWAM's fees ourselves; they are not passed on to clients.

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

Radix Wealth has adopted a Code of Ethics that governs a number of potential conflicts of interest we have when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you and to stress the importance of a culture of compliance within our firm.

Radix Wealth's Code of Ethics includes the following:

- Requirements related to the confidentiality of your personal, business and financial information
- Prohibitions on insider trading (if we are in possession of material, non-public information)
- Reporting of gifts and business entertainment
- Reporting (on an on-going and quarterly basis) all personal securities transactions

Radix Wealth, or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. In some cases, Radix Wealth, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client. We generally trade only in liquid securities and our own trading is not of sufficient volume or frequency to effect market prices. We will not knowingly trade ahead of client orders, and our policies require that client orders be entered prior to Radix Wealth or Radix Wealth associated person trades, or that our associated persons trade in a block with clients and receive the same price. Neither our firm nor any of our associated persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Radix Wealth will always maintain full disclosure with our clients so that you can make informed decisions. We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to service@radix-wealth.com or by calling us at (602) 837-4014.

ITEM 12 – BROKERAGE PRACTICES

Recommendation of a Broker / Custodian; Factors Considered in our Recommendations

Radix Wealth does not maintain custody of your assets, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account to pay our fees or to direct funds to third parties you authorize (see Item 15—Custody, below). In all cases, client assets must be held with a "qualified custodian," generally a broker-dealer or a bank. Although we occasionally work with other broker/dealers and custodians, we recommend Fidelity Brokerage Services, LLC, member FINRA. Fidelity Brokerage Services is part of the Fidelity group of companies, and we gain access to them by using the Fidelity Institutional® ("Fidelity") platform and recommending Fidelity to our clients. We also recommend Charles Schwab & Co., Inc. ("Schwab").

We are independently owned and operated and are not affiliated with Fidelity or Schwab. Fidelity or Schwab will hold your assets in a brokerage account and buy and sell securities as we instruct them to. While we recommend you use Fidelity or Schwab, you will decide whether to do so and will open your account with the custodian by entering into an account agreement directly with them. We don't open the account for you, though we assist you with the process and handle the administrative aspects.

When considering whether the terms Fidelity and Schwab provide are overall most advantageous to you when compared with other available providers and their services, we take into account a range of factors, including:

- Combination of transaction execution services and asset custody services, generally without a separate fee for custody
- Capability to execute, clear, and settle trades

- Capability to facilitate transfers and payments to and from accounts
- Breadth of available investment products
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services and willingness to negotiate prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Services delivered or paid for by Schwab
- Availability of other products and services that benefit us, as discussed below

Brokerage and Custody Costs
Fidelity and Schwab generally do not charge clients separately for custody services but are compensated by charging you commissions or other fees on trades that it executes or that settle into your brokerage account. They are also compensated by earning interest on the uninvested cash in your account or on any margin balance maintained in your brokerage accounts with the custodian.

Most trades no longer incur commissions or transaction fees, though there are exceptions. Custodians disclose their fees and costs to clients when they establish the relationship, and we take those costs into account when executing transactions on your behalf. The custodian will charge you a flat dollar amount as “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 your Fidelity or Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have the custodian holding your assets execute most trades for your account.

Certain mutual funds and ETFs are also made available for no transaction fee (“NTF” funds); as a result many confirmations show “no commission” for a particular fund transaction. Typically, the custodian (but not Radix Wealth) earns additional remuneration from such services as recordkeeping, administration, and platform fees, for the funds and ETFs on their no-transaction fee lists. This additional revenue to the custodian will tend to increase the internal expenses of the fund or ETF. Radix Wealth selects investments based on our assessment of a number of factors, including liquidity, asset exposure, reasonable fees, effective management, and low execution cost. Where we choose a no-transaction fee fund or ETF, it is because it has met our criteria in all applicable categories. Mutual funds that are not on the NTF list are generally subject to a $25 transaction fee. This is most likely to apply to legacy positions transferred to our management.

Products and Services Available to Radix Wealth from Fidelity and Schwab
Fidelity and Schwab are in the business serving independent investment advisory firms like Radix Wealth. Through our agreement with NWAM (see Item 10), we gain access to Fidelity and Schwab’s

institutional brokerage services (trading, custody, reporting, third-party managers, and related services), some of which are not typically available to retail customers. The custodians will also extend the pricing they've negotiated with NWAM to our clients. Certain retail investors may be able to get institutional brokerage services from Fidelity or Schwab without going through us or another advisor. The custodians 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. These support services are generally available on an unsolicited basis (we don't have to ask for them) and at no charge to us. Following is a more detailed description of the custodians' support services.

Custodian Services that Benefit Clients

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 and Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. These services generally benefit you and your account.

Custodian Services that do not Directly Benefit Clients

Fidelity and Schwab also make available to NWAM, and thereby to us, other products and services that benefit us but 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 the custodian'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 or Schwab. In addition to investment research, the custodians also make available software and other technology that:

- Provides access to client account data
- Facilitates trade execution and the allocation of blocked orders for multiple accounts
- Provides pricing and other market data
- Facilitate payment of Radix Wealth's fees directly from your account, if authorized in your advisory agreement
- Assistance with recordkeeping and client reporting

We execute client trades through the custodian holding the assets. Accordingly, we do not seek price improvement through broker-dealers other than our recommended custodian on an individual transaction basis, and we do not permit clients to direct brokerage outside of the custodian. Placing orders with a broker-dealer other than your custodian may cause you to incur fees for "trading away" and will usually prevent you from achieving best execution in light of the additional costs incurred. Because we execute your investment transactions through the custodian holding your assets, we are effectively requiring that you "direct" your brokerage to your custodian, absent other specific instructions as discussed below. Because we are not choosing brokers on a trade-by-trade basis, we may not be able to achieve the most favorable executions for clients and this may ultimately cost clients more money. Not all investment advisers require directed brokerage.

We do not use, recommend, or direct activity to brokers in exchange for client referrals.

Aggregated or Block Transactions

When it is advantageous to clients and can be accomplished efficiently, and where it is consistent with our trade execution agreement with NWAM, we will aggregate client transactions with those of other client accounts at the same custodian, often referred to as a ‘block’ or ‘bunched’ trade. In a block trade, each participating client receives a price that represents the average of the prices at which we executed all of the transactions in that block. Block trades can lower transaction costs and/or help clients achieve better execution. Accounts participating in a block trade share transaction cost on an equal and pro-rata basis. If the order is not completely filled, the securities purchased or sold are allocated among the participating clients, typically on a pro-rata basis. Our agreement with NWAM requires us to upload block trades three hours in advance of market close, which could cause us to delay execution of trades if we have not prepared the affected trade file early enough to meet NWAM’s requirements. We do not believe this is significant given that our investment management approach is not based on frequent or carefully-timed trades.

Research and Other Soft Dollar Benefits

We do not have any “soft dollar” arrangements in place, in which we agree to direct a certain amount of commission dollars to a specific custodian in exchange for research or other services. Rather, the services described in this Item 12 are made available to us simply because we have an agreement with NWAM and then enter into agreements with the custodians and obtain the ability to use their platforms. Many of these services may be used to service all or a substantial number of our accounts, including accounts not maintained at the specific custodian.

The availability of the foregoing products and services to us is not contingent upon our committing to the custodian (or to NWAM) any specific amount of business (assets in custody or trading commissions). In some cases, clients could pay more for custody and execution through the custodian we recommend than through others. We review the capacities and costs of custodians regularly to ensure that our clients are receiving quality executions and competitive pricing, as well as more intangible service benefits.

As part of our fiduciary duty to our clients, we endeavor at all times to put the interest of our clients first. We want our clients to be aware that the receipt of the above benefits and services from the custodian creates a conflict of interest, as this could indirectly influence our choice of either broker-dealer for custody and brokerage services. Radix Wealth reviews its choice of custodians on an annual basis to reaffirm the health of each entity, the quality of executions and the additional services provided by the custodian. We believe our selection of both Fidelity and Schwab as custodian and broker is in the best interest of our clients because of the scope, quality, and price of their services.

Best Execution

As indicated above, we typically require that clients open brokerage/custodial accounts at custodians not affiliated with us, namely Fidelity and Schwab. We are not compensated directly for recommending custodians to clients, though we may receive indirect economic benefits from those custodians as outlined above. The criteria for recommending a custodian include reasonableness of commissions and other costs of trading, ability to facilitate trades, securities lending needs, access to client records, computer trading support and other operational considerations. These factors will be reviewed from time to time to ensure that the best interests of our clients are upheld.

In seeking "best execution" for clients, the key factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into account the full range of services, including execution capability, technological processes used for submitted trades and other valuation services.

ITEM 13 – REVIEW OF ACCOUNTS

Periodic Reviews

Accounts are reviewed by Radix Wealth or qualified staff members. Clients portfolios are reviewed by the assigned advisor, and the review process is overseen by our Chief Compliance Officer. We review portfolio holdings on an ongoing basis, with the frequency of specific portfolio reviews based on the client's investment objectives and changes to risk profiles or investment horizons, but no less than annually.

Review Triggers

More frequent reviews are triggered by a change in your investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in economic climate.

Regular Reports

Clients generally receive either quarterly or annual reports from Radix Wealth, depending on what we agree to with you. These are in addition to statements delivered at least quarterly by the qualified custodian holding account assets. We urge client to carefully compare the custodial statements to any statements we provide and to notify us promptly of any differences.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

Radix Wealth is compensated solely by fees paid by our clients. The firm does not provide compensation to third parties for referrals and does not receive compensation from any third party for client referrals or any other purpose.

As discussed in Item 4 and Item 10, if we recommend insurance products and clients choose to accept our recommendation and buy insurance through us, our representatives and Kierland Insurance will receive customary insurance commissions.

As discussed in Item 10, Radix Law owns 19% of Radix Wealth. We routinely refer clients to each other but do not share advisory fees or otherwise provide compensation for referrals. Kierland Insurance will share insurance commissions where the referring party is insurance licensed; some of Radix Law's lawyers are individually licensed as insurance producers. Radix Law stands to benefit from referrals to Radix Wealth due to possibly increased profit distributions based on their ownership interest. If we refer clients to Radix Law, and they choose to engage Radix Law for legal services, those clients will enter into a separate engagement with Radix Law and will pay legal fees as agreed with that firm. No clients of either firm are required to accept referrals to the other.

ITEM 15 – CUSTODY

All client funds and securities are maintained with a qualified custodian; we don't take physical possession of client assets. You will receive account statements and transaction confirmation notices directly from the custodian at least quarterly, which you should carefully review. We urge you to carefully compare the custodian's account statements with the periodic data you receive from us and to notify us promptly of any discrepancies.

We have the ability to deduct our advisory fees directly from your accounts based on your written authorization to do so, and this ability is technically considered "custody," which we address through the invoice process described in Item 5. At the same time we send the qualified custodian written notice of the amount of the fee to be deducted from your account, we also send you a written invoice including the fee charged, the amount of assets under management on which the fee was based, and the time period covered by the fee. The fee deduction shown on your custodial statement should match the fee on our invoice.

ITEM 16 – INVESTMENT DISCRETION

Radix Wealth asks our clients to give us discretionary authority to execute transactions without our client's prior approval. These transactions may include the purchase and selling of securities, arranging for payments or generally acting on behalf of our clients in most matters necessary to the handling of the account.

ITEM 17 – VOTING CLIENT SECURITIES

The clients of Radix Wealth retain the authority to proxy vote and will continue to do so until we otherwise may agree in writing. You should ensure that proxy ballots are mailed directly to you by selecting this option on your custodial application forms. You are welcome to delegate said proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate custodial form. Where First Trust is acting as sub-advisor to a client portfolio, First Trust will vote proxies in accordance with their Proxy Voting Policies and Procedures. See First Trust's disclosure brochure for more information.

ITEM 18 – FINANCIAL INFORMATION

Radix Wealth does not solicit prepayment of more than $500 in fees per client six (6) or more months in advance.

Radix Wealth has no financial commitment that impairs our ability to meet contractual and fiduciary commitments to our clients. In addition, neither Radix Wealth nor its management persons have been the subject of a bankruptcy proceeding at any time during the past 10 years.

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISORS

The formal education, business background, and outside business activities of our investment advisor representatives can be found in the specific individual's Form ADV 2B Supplement. Other questions specific to this item are detailed in our responses to other items in this Brochure.

Neither Radix Wealth nor any of its management persons has been involved in any of the following:

- An award or otherwise been found liable in an arbitration claim
- An award or otherwise been found liable in a civil, self-regulatory organization or administrative proceeding