



CORBETT ROAD

OVERVIEW

Nature
not Numbers.



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Our Story

Corbett Road was founded in 2001 on the premise that the traditional approach to planning and investing isn't always the best approach. While retirement calculators and financial analytics are useful, they often fall short because they do not account for the human element. Simply, they fail to consider YOU.

We pride ourselves on our unique **smartlife**™ planning process and **crfusion**™ investment approach. Human behavior influences near every aspect of decision-making. By incorporating an understanding of these tendencies into our planning process and offering clients the flexibility to develop customized strategic and tactical investment approaches, we foster stronger, more successful, and enduring client relationships.

Our Mission

Our firm is driven by a clear mission – to create the best future for our clients.

We bring our clients' goals and visions to life through:

- » Exceptional client service
- » **smartlife**™ planning process
- » **crfusion**™ investment approach

About Corbett Road & Spire

Spire Wealth Management, LLC is the Registered Investment Advisor, and Spire Securities, LLC is the Broker/Dealer for Corbett Road.

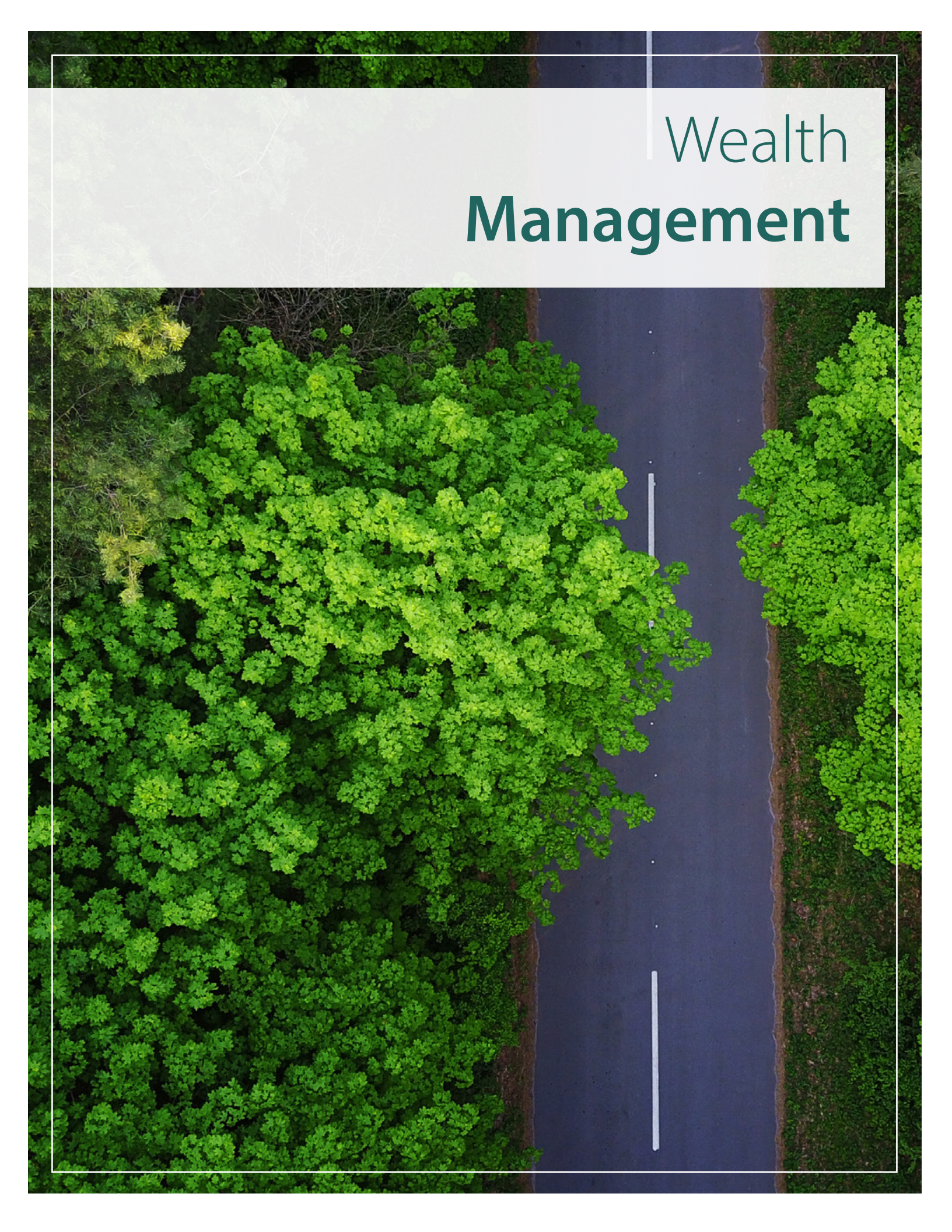
Plainly stated, Corbett Road serves as your exclusive point of contact and handles all of the Wealth Management, Investment Management, and Client Service aspects of your relationship. Corbett Road partners with Spire to provide all of the back-office functions necessary to navigate our industry's regulatory environment, licensing, and compliance aspects.



- » Wealth Management
- » Investment Management
- » Client Service



- » Regulatory Environment
- » Licensing
- » Compliance

An aerial photograph of a paved road winding through a dense forest. The road is dark grey with white dashed lines. The surrounding trees are lush green, with some taller, darker green trees on the left side. The overall scene is serene and natural.

Wealth **Management**



smartlife™

It's Nature, Not Numbers

WHY IS smartlife™ DIFFERENT?

Typical approaches to wealth management, while well intended, typically lack execution and effectiveness because they fail to appropriately account for the most critical element. They fail to account for YOU. Smartlife™ creates a better experience that is flexible enough to adjust with you as your life changes.

- » Many financial plans focus solely on data, facts, and figures.
- » Life happens and plans become obsolete shortly after their creation.
- » Without strategic action taken, the creation of a plan can be a fruitless exercise.

Corbett Road believes it is not solely the numbers (financial data) that inhibit one's success, but rather their human nature. By helping you engage with your plan and act with intention, you take proactive steps towards attaining your goals and vision by design, rather than by default.



smartlife™
ACCESS

smartlife™ Access is our introductory level into Corbett Road Wealth Services. Our Advisors offer situational client-driven advice and assessment, annual reviews of your accounts, and can be used as a sounding board for all financial matters.

smartlife™ Access offers the following:

- » Recurring Reviews
- » How much do I have when? (Monte Carlo and Cash Flow Analysis)
- » Asset Map®
- » Nitrogen

HOW MUCH WILL I HAVE WHEN...?

The Monte Carlo and Cash Flow Analysis reports depict your current financial picture based upon information provided to us. The Monte Carlo Summary report runs 1,000 randomized simulations of your financial plan against various market conditions and illustrates the potential impact of varying investment returns of your financial future. The Cash Flow report demonstrates the longevity of your assets based upon your annual net cash flow.



A SIMPLIFIED FINANCIAL PICTURE IS WORTH A THOUSAND WORDS

Asset-Map® is a visual representation of your current net worth based upon information provided to us. This can be used as a planning tool that helps reveal gaps in your financial picture, but may also serve as a valuable estate planning document to store alongside your Will, Trust, etc. This illustration provides a detailed map of your assets to the executor/executrix of your estate and may make the handling of your financial affairs significantly easier on them.

WHAT'S MY RISK NUMBER?

Corbett Road uses Nitrogen to fully understand your view of money and your appetite for risk. This initial step is vital to your future success, as the market can be extremely volatile, causing some to make irrational decisions at the worst possible moment. Understanding the level of risk you are willing to take is paramount in constructing an overall game plan that can weather market storms when they occur.

RISK
72

Your Current
Portfolio



RISK
55

Your Risk
Score



RISK
55

Corbett Road
Solution



smartlife™ WEALTH

smartlife™ Wealth builds upon the features of smartlife™ ACCESS by providing a holistic financial plan of your current financial state and a look into your financial future. The plan will highlight current strengths and weaknesses and provide guidance to help you reach your goals.

The first step of smartlife™ Wealth is designed to provide the bedrock for building a new financial future. The plan will cover the following areas:

- » Budget & Cash Flow Planning
- » Retirement Income Planning
- » Investment Planning
- » Risk Management & Insurance
- » Liabilities Planning
- » Estate Planning
- » Tax Planning



“The measure of who we are is what we do with what we have.”
–Vince Lombardi

Corbett Road's smartlife™ Wealth experience helps you create your vision, overcome roadblocks, and execute on your life goals in three phases:

01

DISCOVER

- » Wealth Discovery
- » Life Index

02

PLAN

- » Wealth Plan
- » Purpose and Values
- » Goals and Action Steps

03

ACT

- » HorizonView™
- » Kinetic Advice™
- » Education
- » Coaching
- » Accountability Partner

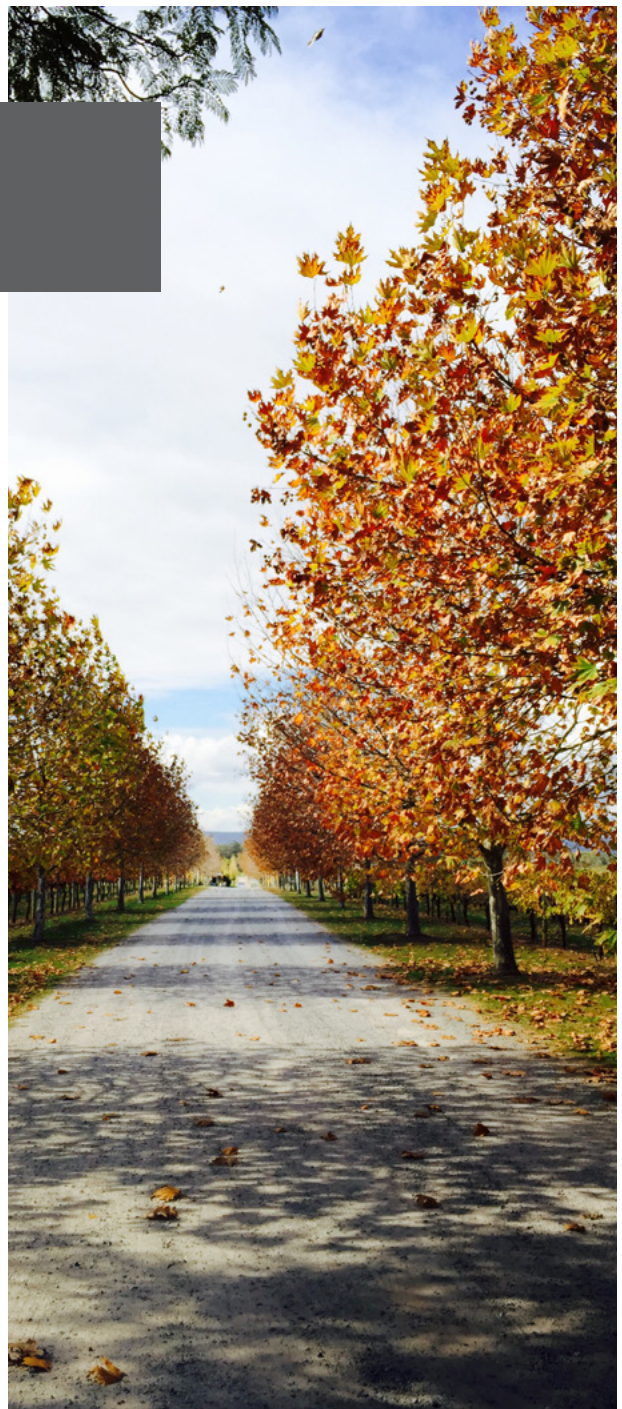


Behavioral Alpha is **KEY!**

Behavioral Alpha describes the additional return that investors can experience by effectively managing their own behaviors, biases, and responses to conditions and/or events that occur.

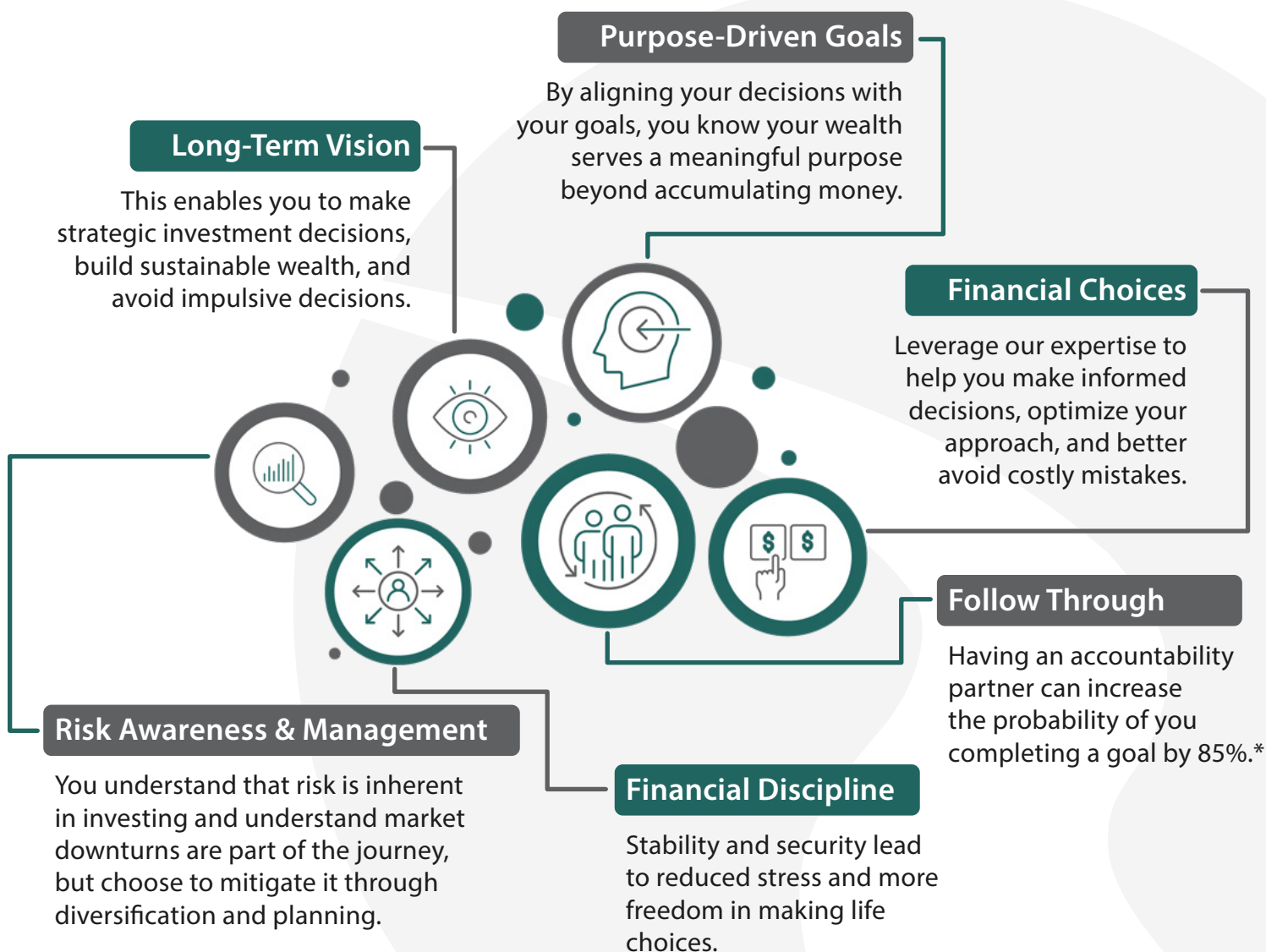
Through our smart**life**™ Planning Process and crFusion™ investment approach, you are able to leverage systems that were created specifically to address behavioral tendencies of clients like you. Further, your ability to personalize and align your approach with your vision, reduces behavioral gaps, increasing your overall odds of long-term success and realizing your goals.

When you use multiple investment styles and take necessary steps to plan for the certainty of uncertainty, we believe you will be better positioned and more resilient in the face of changes (to your relationships, your health, your goals, your money, etc.) that will inevitably occur throughout your lifetime.

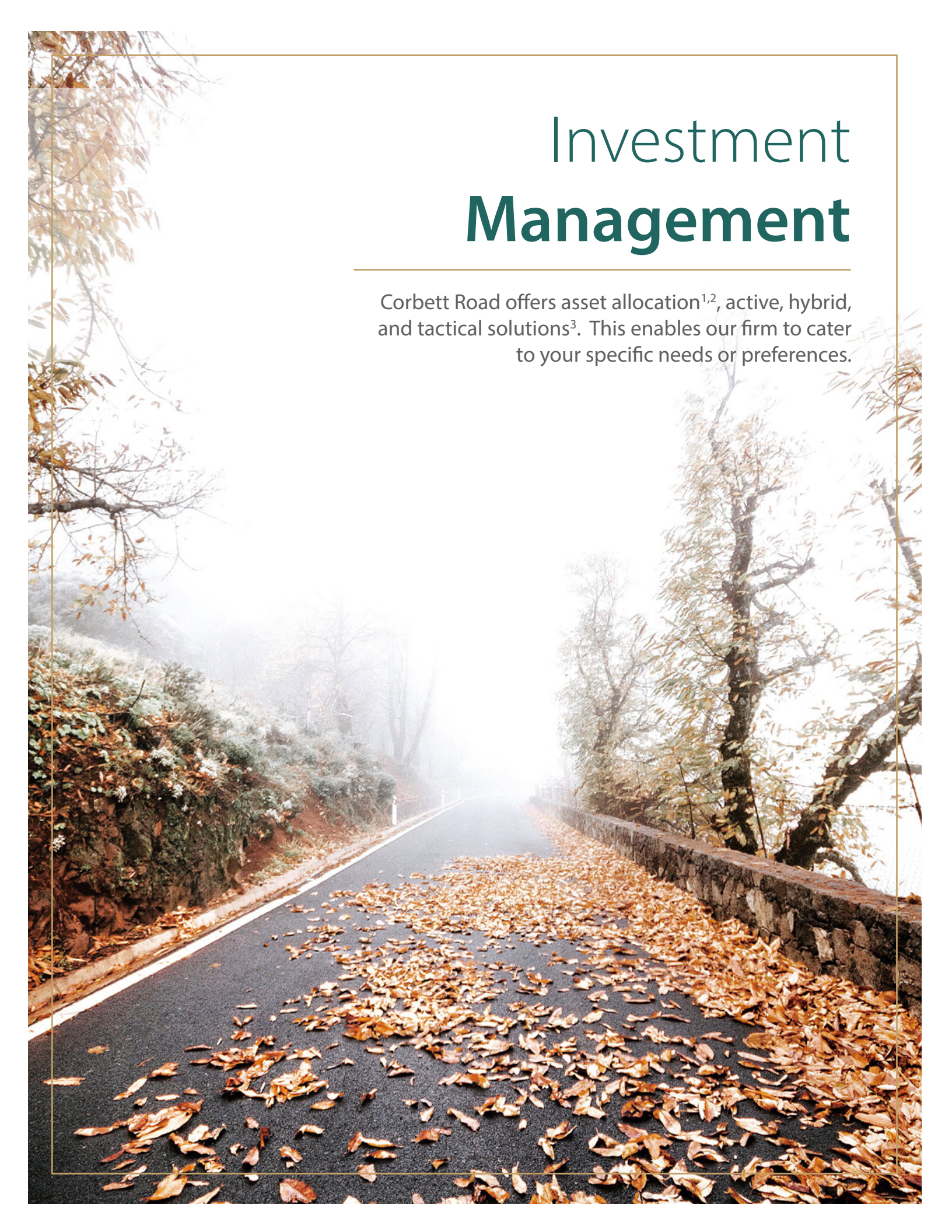


smartlife™ - Unlock your wealth mindset...

A **wealth mindset** goes beyond accumulating assets – it's a **way of thinking** that prioritizes long-term growth, stability, smart investing, and discipline. It is a **proactive approach** in which individuals focus on purpose and goals, strategic planning, opportunities, and financial education, rather than short-term gains or limitations. Our smartlife™ planning process helps you **address your...**



*Source: AFCPE

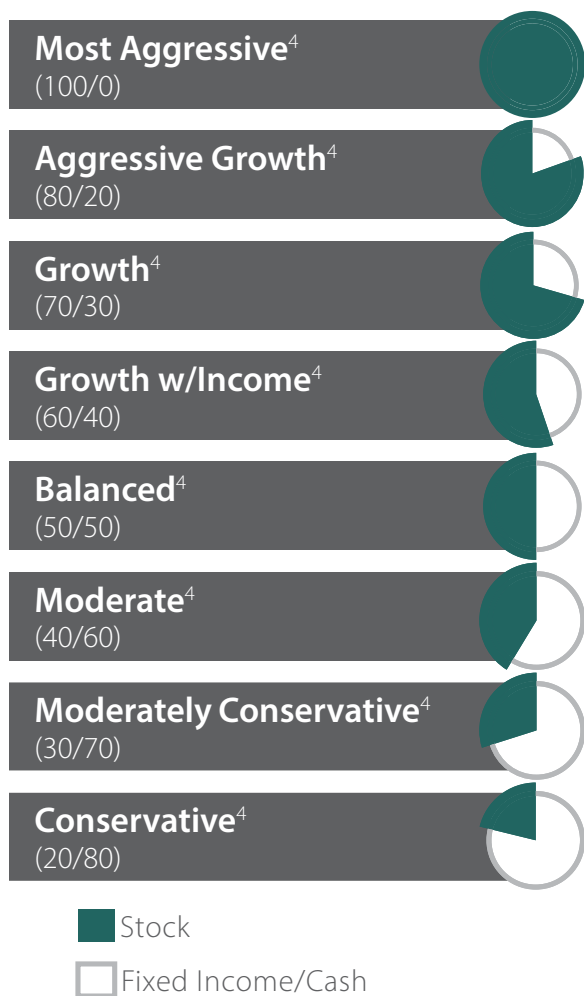


Investment Management

Corbett Road offers asset allocation^{1,2}, active, hybrid, and tactical solutions³. This enables our firm to cater to your specific needs or preferences.

Passive Solutions

Asset Allocation is an investment approach that aims to balance risk by dividing assets among major categories such as cash, bonds, and stocks. Furthermore, the goal is to divide your investment dollars among asset categories that do not all respond to the same market forces in the same way at the same time. While one asset category increases in value, another may decrease or may not increase as much. The risk-return tradeoff lies at the core of this approach.



Active Solutions

The active strategies seek long-term growth of capital. They are designed to remain fully invested throughout the economic cycle and weather market volatility, with the goal of generating alpha through stock selection.

Opportunity – This strategy combines top-down macroeconomic research with a bottom-up fundamental approach to individual stock selection. The top-down analysis guides portfolio positioning while stock selection seeks to incrementally add to potential returns.

Dynamic ETF – This strategy selects investments based upon the firm's analysis of the market cycle and seeks to capitalize on trends among certain styles, factors, and industries that are expected to outperform during different stages of the cycle.

Core Equity – This strategy selects stocks from the S&P 500 Index using a multi-factor model that seeks to identify US large-cap businesses with industry-leading scale, operating efficiency, and earnings momentum.

Select Q – This strategy selects stocks from the Nasdaq-100 Index® using a multi-factor screening tool to identify high-quality, high-growth businesses exhibiting positive earnings momentum.

Select V – This strategy selects stocks from the S&P 500 Index using a multi-factor model that seeks to identify high-quality businesses trading at attractive valuations with improving earnings outlooks.

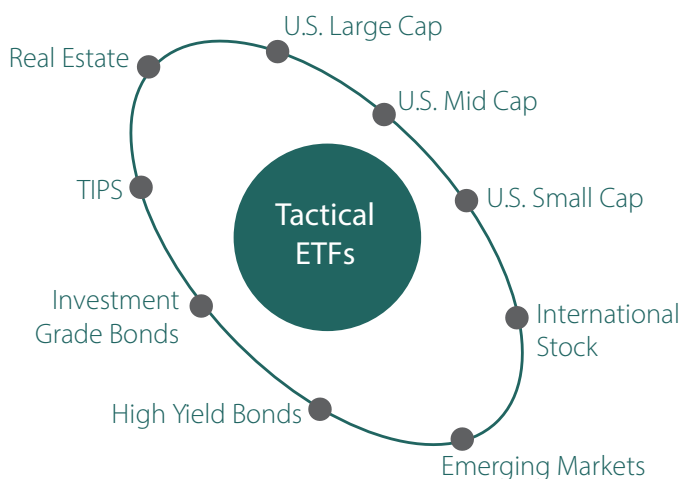
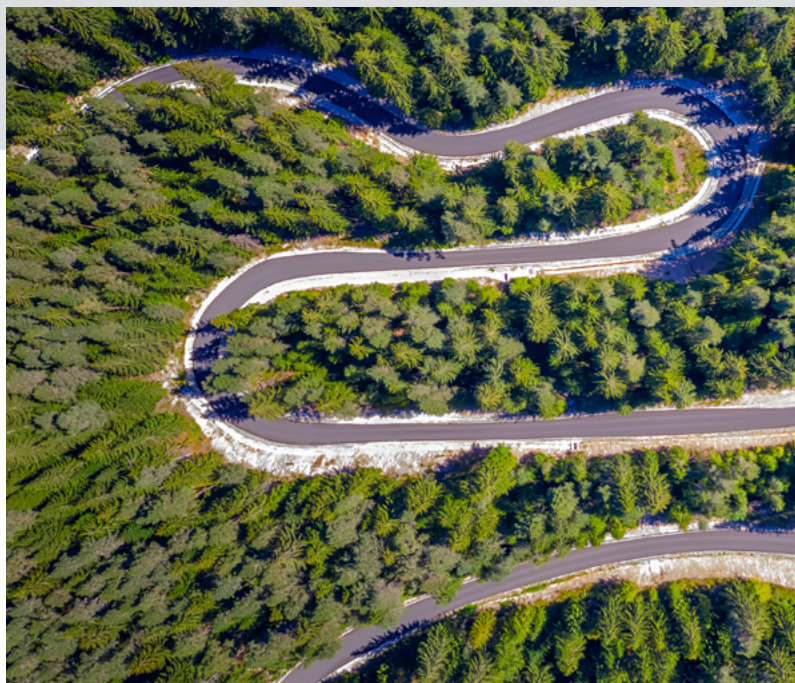
1. Asset allocation strategies and diversification do not ensure a profit or protect against loss.
2. Investments in securities and other instruments involve risk and will not always be profitable.
3. Tactical investing is generally more complex and may involve higher or different risks than standard long-term (strategic) investment strategies.
4. Portfolio allocations are subject to change

Hybrid Solutions

The **HELIX** Series

Specifically designed for taxable accounts, the HELIX Series combines tactical and passive solutions in an effort to capture the risk reduction benefits of tactical management in a tax-efficient manner.

This is accomplished using actively managed, tactical ETFs, which form the foundation of the HELIX Series. Our investment team constructs an asset allocation model around the tactical component using 8-15 broadly diversified ETFs. The growth and risk objectives of the strategy are tailored toward your targeted allocation, which is determined by your specific risk tolerance. This combination results in a solution that delivers the active advantages of tactical exposure, paired with the diversification benefits of asset allocation, all within the tax-efficient structures of ETFs.



Buffered Outcome Strategies

Our Buffered Outcome strategies provide a solution to investors that find experiencing losses to be more difficult than missing out on potential gains. These strategies utilize exchange-traded funds (ETFs) that seek to provide investors with returns linked to the performance of an underlying index(es), while also offering a degree of downside protection over a specified time period.

These ETFs function by setting a specific level of downside protection (or buffer), which may vary based upon the provider, but typically ranges between approximately 5-25% of the fund's value. This downside protection is achieved by using FLEX option contracts, which help to limit the amount of losses the fund incurs in the event of a market downturn. If the fund experiences a loss within the specified buffer, the fund will absorb the loss the investor incurred. However, for any losses that exceed the specified buffer, the investor will experience the full extent of the loss. Conversely, the upside participation is provided by the fund capturing growth opportunities in up markets, subject to a predetermined maximum cap.



Tactical Solutions

Our **smarttactical™** Strategies enable your overall portfolio to be more adaptive to changing market environments. These strategies have the ability to invest in any exchange traded asset class and are not restricted by market cap, sector, or geographic location. They may also hold a substantial fixed income or cash position based upon our **macrocast™** or **microcast™** indicators.

macrocast™

- V Valuation
- I Inflation
- T Technical Analysis
- A Aggregate Economy
- L Liquidity
- S Sentiment

microcast™

- T Technical Analysis
- U Underlying Market Breadth
- M Momentum
- S Sentiment

Bringing Corbett Road Strategies Together

crfusion™ is the ability to blend Corbett Road strategies into a custom portfolio solution. By combining tactical, active, and passive strategies we are able to establish guardrails around a client's maximum and minimum allocation targets. This creates a more customized and targeted solution that considers both the positive and negative fluctuations that occur throughout a market cycle. The underlying goal of **crfusion™** is to enable us to compete with an established benchmark when the market is considered "healthy", but also provide a mechanism of defense when the market faces significant recessionary pressure.



Passive Strategies

Passive strategies are designed to maintain their allocation regardless of market conditions.



Active Strategies

Active strategies remain fully invested, but will change the underlying investment based on fundamental analysis.



Tactical Strategies

Tactical strategies have the ability to shift the allocation more favorably to stocks, fixed income, or cash at any time depending upon the health of the market.



crfusion™

crfusion™ allows a client to invest in a customized and targeted solution that considers both the positive and negative fluctuations that occur throughout a market cycle.

Meet **Our Team**



C. Scott Airey, CFP®, MBA
Chairman

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Scott serves as Chairman to Corbett Road and is a member of the Corbett Road Investment Committee. Prior to founding Corbett Road, Scott was a Branch Manager at Charles Schwab and began his financial services career at Legg Mason Wood Walker. Scott earned his BS in Consumer Economics from the University of Delaware and MBA from the University of Baltimore. He is a Certified Financial Planner™ and holds FINRA Series 7, 9, 10, 63, and 65 licenses and Life, Health, and Variable Annuity Insurance licenses.

Matthew Gaffey, CFP®, ChFC®, BFA™, CF2
President

703.748.5836 | matthew.gaffey@corbettroad.com

Matthew is the President of Corbett Road and a member of the Corbett Road Investment Committee. He brings years of wealth management experience to the team and has been extensively quoted in several national publications and news outlets, including Forbes, CNBC, Yahoo Finance, and USA Today. Prior to Corbett Road, Matthew worked for Fidelity Investments, providing financial services and retirement planning to clients. He has a Bachelor of Science from Virginia Tech and has earned the Certified Financial Planner™, Chartered Financial Consultant®, Behavioral Financial Advisor™, and Certified Financial Fiduciary® designations. He also holds FINRA Series 7 and 66 licenses, as well as Life, Health, and Variable Annuity insurance licenses. Matthew is a member of the Financial Planning Association and Virginia Tech Alumni Association.



Jeffrey McCoy, AAMS®, CF2
Managing Partner, Sr Wealth Manager – PCG

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Jeff is a Managing Partner at Corbett Road and serves as Lead Chair on the Corbett Road Investment Committee. Prior to joining Corbett Road, Jeff spent 17 years as a VP/Branch Manager at Charles Schwab, overseeing several branch locations in Maryland and Virginia. Jeff spent his early years in the industry with T. Rowe Price Associates and Legg Mason Wood Walker. Jeff has a Bachelor of Science in Consumer Economics from the University of Delaware and holds FINRA Series 7, 9, 10, 63, and 65 licenses. He has also earned the Accredited Asset Management Specialist and Certified Financial Fiduciary® designations, and completed the Certified Investment Management Analyst Executive Education Program through the University of Chicago Booth School of Business.





Maureen Pitts, AAMS[®], CF2
Managing Partner, Director of Client Services

703.748.5833 | maureen.pitts@corbettroad.com

Maureen is a Managing Partner of Corbett Road and oversees client relations and general administration for the team. Maureen previously worked as an account services supervisor at ADVISORport Inc., a financial services provider. She has years of experience working in the financial services industry providing excellent customer service to large enterprise sponsors, RIAs and money managers. Maureen earned a Bachelor of Science in Business Administration from Cabrini College and holds FINRA Series 7, as well as Life, Health, and Variable Annuity Insurance licenses. She is also an Accredited Asset Management Specialist and Certified Financial Fiduciary[®].



Rush Zarrabian, CFA[®]
Managing Partner, Portfolio Manager

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Rush is a Managing Partner of Corbett Road and directs the Investment Management Division. He is a member of the Corbett Road Investment Committee and is the Portfolio Manager for the Opportunity, Dynamic ETF, and Core Demand strategies. Before joining Corbett Road, Rush worked at two of the largest financial institutions in the country in a variety of roles, including management, operations, and lending. Rush has a Bachelor of Science in Finance from Virginia Tech and holds FINRA Series 7 and 66 licenses. He is a CFA Charterholder and a member of the CFA Institute and CFA Society of Washington, D.C.

Liliana Molina, CFP®, MBA, CF2
Senior Wealth Manager – PCG

703.748.5819 | liliana.molina@corbettroad.com

Lili provides her clients with the support they need to identify their goals and develop sound plans for their financial future. She believes success should be measured not just by your financial well-being but by how confident you feel about your future. Her mission is to help clients reach their financial goals through a relationship based on personalized, knowledgeable advice.

Lili earned her BA from George Mason University and MBA from George Washington University. She is a Certified Financial Planner™ and Certified Financial Fiduciary®. Lili also holds FINRA Series 6, 7, 63, and 65 licenses and Life, Health, and Variable Annuity Insurance licenses.



Will Cunningham, CFP®, BFA™, CF2
Senior Wealth Manager – PCG

703.748.5826 | will.cunningham@corbettroad.com

Will offers clients years of financial services, investment guidance, and individualized planning experience. Will uses our Milestone™ planning process to assist clients in achieving their financial goals. Prior to joining Corbett Road, Will worked as a Client Relationship Advisor for a mutual fund company. While there, he provided retirement planning services to their high net asset clients. Will earned a Bachelor of Arts from James Madison University and is a Certified Financial Planer™, Behavioral Financial Advisor™, and Certified Financial Fiduciary®. He holds FINRA Series 7, Series 63, and Series 65 licenses.

Meet **Our Team** Cont...



Alexi Sacco, CF2
Senior Regional Wealth Consultant

703.748.5805 | alexi.sacco@corbettroad.com

Alexi provides clients with a holistic view of their financial picture. By identifying their current financial situation, risk tolerance, and lifetime goals, Alexi is able to deliver a more comprehensive and individualized client experience. Prior to joining Corbett Road, Alexi worked as a Financial Advisor at Oppenheimer and an Associate at UBS. He received a Bachelor of Science in Business with a Specialization in Finance from American University and is a member of the American University Alumni Association. Alexi is a Certified Financial Fiduciary® and holds FINRA Series 7 and Series 66 licenses, as well as Life, Health, and Variable Annuity insurance licenses.

Georgia Lord, CFP®, BFA™, CF2, FPQP®
Financial Planner

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Georgia is a Financial Planner at Corbett Road. She believes one's financial plan is an invaluable tool in making informed decisions, protecting against uncertainties, and working toward achieving financial security and prosperity.

She is a Certified Financial Planner™, Certified Financial Fiduciary®, and has many years of experience in financial services and financial planning, especially in the areas of retirement, tax and cash flow planning. Georgia moved to the United States from Australia in 2018, where she studied Finance and Music at the Queensland University of Technology. Prior to joining Corbett Road, Georgia provided financial planning guidance and educational workshops to advisors and clients as part of the Financial Planning Team at Oppenheimer. She holds FINRA Series 7 and Series 66 licenses, as well as Life, Health, and Variable Annuity Insurance licenses.



Meet **Our Team** Cont...

Marcus Malone, CFP®, BFA™, CF2 *Wealth Manager*

703.748.5816 | marcus.malone@corbettroad.com

Marcus offers years of experience in the financial services arena and believes planning is an integral part in helping a client achieve their personal measure of success. Prior to Corbett Road, Marcus worked for Pioneer Investments, providing exceptional customer service to investors across the country. He also spent time with International Fund Services, in which he was responsible for the complete administration of multiple hedge funds and the management of many high profile relationships. Marcus earned a BS from Virginia Tech, is a Certified Financial Planner™, and a Certified Financial Fiduciary®. He also holds FINRA Series 7 and 66 licenses, as well as Life, Health, and Variable Annuity Insurance licenses.



Sean Rosencrance, CFP®, BFA™, CF2 *Wealth Manager*

703.748.5814 | sean.rosencrance@corbettroad.com

Sean prioritizes focusing on understanding his clients and their personal motivations. He has found he has been able to add the most value to a relationship through active listening and asking the right questions. He earned a Bachelor of Science in Finance with a concentration in Financial Planning at Virginia Tech and is a member of the Virginia Tech Alumni Association. He has also earned the Certified Financial Planner™, Behavioral Financial Advisor™, and Certified Financial Fiduciary® designations. He holds FINRA Series 7 and Series 66 licenses, as well as Life, Health, and Variable Annuity Insurance licenses.





Camilla Carvalho, APMA™
Wealth Consultant

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Through the evaluation of their goals, assets, and long-term objectives, Camilla provides tailored solutions and an individualized experience to clients. In addition to providing knowledgeable support and helping clients build financial plans, she has extensive experience in guiding clients through the healthcare marketplace and Medicare system processes. Camilla received a Bachelor of Arts from the University of Rochester and is an Accredited Portfolio Management Advisor™. She holds the Series 7 and Series 66 licenses, as well as Life, Health, and Variable Annuity Insurance licenses.



Carmen Dello Iacono, CFA®
Senior Research Analyst

703.748.5818 | carmen.delloiacono@corbettroad.com

Carmen works in Corbett Road's Investment Management Division, where he supports all of the firm's investment strategies and is a member of the Corbett Road Investment Committee. Before joining Corbett Road, Carmen worked as an Investment Consultant at a large financial data company. Carmen earned a Bachelor of Science in Physics with a minor in Mathematics at Boston College. Carmen holds Series 7 and 66 licenses as well as a CFA Charterholder. He is also a member of the CFA Institute, CFA Society of Washington, D.C., and the Boston College Alumni Association.

Connor Bector, CFP®
Research Analyst

703.584.3539 | connor.bector@corbettroad.com

Connor is a Research Analyst at Corbett Road within the Investment Management Division. He supports the investment team by providing market research and trading client accounts. He earned a Bachelor of Business Administration in Finance at James Madison University, is a Certified Financial Planner™, and holds his FINRA Series 7 & 66 Licenses.



Angelica Orozco
Senior Client Service Specialist

703.748.5822 | angelica.orozco@corbettroad.com

Angelica Orozco offers years of experience in the financial services industry and supports the client relationship team by collaborating with clients, facilitating complex service requests, and helping implement internal processes. Prior to joining Corbett Road, she was responsible for overseeing the client service experience and helping clients align their finances with their life goals at Morgan Stanley and Merrill Lynch. Angelica earned a Bachelor of Science degree in Business Administration from California State University East Bay and holds FINRA Series 7, 63, and 66 licenses. She is also fluent in both English and Spanish.



Nicole Capobianco
Client Onboarding Specialist

703.748.5807 | nicole.capobianco@corbettroad.com

As a Client Onboarding Specialist, Nicole supports the Client Services Team and works to ensure that all clients receive an exceptional level of service and onboarding experience. Nicole honed her craft and ability through her many years within the financial industry, previously excelling as a Client Service Associate. She earned a Bachelor of Science in Financial Planning from the University of Georgia and is a member of the University of Georgia Alumni Association.



Meet **Our Team** Cont...



Adreana Dejohn
Client Service Associate

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As a Client Service Associate, Adreana supports the Client Services Team and works to ensure that clients receive an exceptional level of service. She is well-versed in solving client inquiries and managing relationships with a focus on personalized attention and effective communication. Her ability to act as a liaison between clients and advisors helps provide a cohesive and responsive experience. Adreana attended Cabrini University where she earned a Bachelor of Science in Exercise Science and Health Promotion.

Nadia Rullo
Client Service Associate

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As a Client Service Associate, Nadia plays a pivotal role in supporting our advisors and ensuring clients receive an exceptional level of service with professionalism and efficiency. She has several years of experience in the wealth management arena and is committed to fostering strong client relationships. Nadia earned a Bachelor of Business Administration in Finance from Florida International University.



Karli Harkleroad
Design/Marketing Associate

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Karli is a creative innovator, branding strategist, and design expert with years of expertise in creating impactful visual branding solutions. She pairs a broad range of creative leadership experience in brand strategy and development, graphic design, and marketing with a deep understanding of the psychology behind design to create effective campaigns and corporate narratives. Prior to joining Corbett Road, Karli was a Senior Design & Marketing specialist working in tandem with C-level executives to guide the creative marketing strategy and design of multi-million dollar companies. Karli earned her B.A. in Graphic Design from The University of Maryland, Baltimore County.



Disclosures

Spire Wealth Management, LLC Client Relationship Summary (Form CRS)

Item 1 Introduction

Spire Wealth Management, LLC is registered with the Securities and Exchange Commission as an Investment Adviser. Investment advisory services and compensation structures differ from those of a registered broker-dealer, and it is important that you understand the differences. You should carefully consider which types of accounts and services are right for you.

Free and simple tools are available to research firms and financial professionals at www.Investor.gov/CRS. The site also provides educational materials about broker-dealers, investment advisers and investing.

Item 2 Relationships and Services

What investment services and advice can you provide me? We provide investment advisory services, through our investment advisory representatives ("IAR") including discretionary and non-discretionary investment management and financial planning and consulting services to individuals, trusts, and estates (our "retail investors").

When a retail investor engages us to provide discretionary or non-discretionary investment management services we shall monitor, on an ongoing basis, no less than quarterly, the investments in the accounts over which we have been granted authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade, and allocate the investments within your account(s) consistent with your investment objectives. When engaged on a non-discretionary basis, the retail investor makes the ultimate decision regarding the purchase and/or sale of investments. Our discretionary or non-discretionary authority over your account(s) shall continue until our engagement is terminated. We also offer model asset allocation portfolios through our Investment Supervisory Services program. Some of our IARs offer Proprietary Model Portfolio Strategies. We also provide services wherein we may select independent third-party managers to manage your portfolio. This includes a Wrap-Fee program offered through one of our custodians. We monitor the performance of the third-party asset manager on an ongoing basis.

When a retail investor engages us to provide financial planning and consulting services as part of the investment management engagement, we rely upon the information provided for our review and do not verify or monitor any such information while providing this service. We do not limit the scope of our investment advisor services to proprietary products or a limited group or type of investment. While we do recommend clients to maintain a minimum asset level of \$25,000, there is no account minimum. We may group certain related client accounts for the purpose of determining your advisory fee. For additional information including minimum investment amounts, please see www.SpireIP.com for our Form ADV Part 2A, brochure (Items 4 and 7 of Part 2A)

Conversation Starters:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

Item 3 Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay? We provide our investment advisory services on an ongoing asset-based fee basis. When engaged to provide discretionary or non-discretionary investment management services, we shall charge a fee calculated as a percentage of your assets under our management (our "AUM Fee"). Our annual AUM Fee schedule is negotiable and generally ranges from .02% to 2.25%, depending upon the fee schedule used by your specific advisor. We typically deduct our AUM Fee from one or more of your managed accounts, either quarterly in advance, based upon the prior quarter end balance or monthly in arrears, based on an average daily account balance for the month. Independent third-party managers utilized in managing client accounts and/or our IARs offering proprietary strategies will charge fees separately from our management fee. Additionally, our representatives are compensated based upon the amount of assets that they service; therefore, we have an incentive to encourage you to increase the assets maintained in accounts we manage. Specific information regarding the fees that you will be charged will be disclosed in your Investment Management Agreement ("IMA"). These fees are also described in our Form ADV Part 2A, Item 5.

Because our AUM Fee is calculated as a percentage of your assets under management, the more assets you have in your advisory account, the more you will pay us for our investment management services.

We offer our financial planning and consulting services on either an hourly rate or fixed fee basis, ranging from \$100 to \$500 on an hourly rate basis or on a negotiated fixed fee basis. Prior to accepting your engagement, we will assess the nature and scope of the services requested and negotiate either an hourly rate or fixed fee engagement fee. We may request a retainer upon completion of our initial factfinding session with you. The balance is due upon completion of the plan. You will be invoiced directly from your advisor for financial planning and consulting fees based upon your agreed upon payment schedule.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. For accounts managed outside of a wrap fee program, some custodians charge brokerage commissions and/or transaction fees for effecting certain securities transactions as well as certain processing activities (i.e. transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). Certain custodians may charge an asset-based fee in lieu of transaction-based commissions for transaction costs. In addition, relative to all mutual fund and exchange traded fund purchases, certain charges will be imposed at the fund level (e.g. management

fees and other fund expenses). The custodian's fees are separate from your advisory fee paid to Spire Wealth Management. With respect to clients who have assets allocated to an unaffiliated wrap fee program, client assetbased fees will include most transaction costs and fees to a broker-dealer or bank that has custody of these assets, and therefore are higher than a typical asset-based advisory fee.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more detailed information about our fees and costs please review our Form ADV Part 2A brochure (specifically Item 5) which can be found on our website at www.SpireIP.com.

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

- We receive certain support technologies and/or services from our custodian.
- We receive greater compensation when you place more assets in your account.
- We may not charge a fee on some assets held in your account and therefore have an incentive to hold more assets on which we do charge a fee.

We receive certain support and or services from our custodians such as research and access to their technologies. As participants in the Charles Schwab & Co. or Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") referral programs we may be incentivized to place assets with those custodians. In addition, some of our advisory personnel are separately licensed which allows them to offer commission-based products as well as insurance.

How do your IARs make money? Our IARs are compensated by the payment of the fee collected for the management of your accounts per the terms of the IMA. Certain IARs are separately licensed as registered representatives (RR) of Spire Securities, LLC (an unaffiliated, registered broker-dealer, member FINRA). These individuals can affect separate securities transactions for which they will receive brokerage compensation. Some of our IARs are also licensed insurance agents and receive commissions in connection with insurance product sales.

Additional Information: For more detailed information about our conflicts of interest, please review our Form ADV 2A Firm Brochure (Items 5, 10 & 11).

Conversation Starters:

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

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

Item 4 Disciplinary History

Do you or your financial professionals have legal or disciplinary history? Yes. We encourage you to visit www.investor.gov/CRS to research our firm and our financial professionals.

Conversation Starters:

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

Item 5 Additional Information

Additional information about our firm is available on the SEC's website at www.adviserinfo.sec.gov. You may contact our Chief Compliance Officer at any time to request a current copy of your Form ADV Part 2A or our relationship summary.

Conversation Starters:

Who is my primary contact person? Are they a representative of an investment adviser or a broker-dealer?

Who can I talk to if I have concerns about how this person is treating me?

Our Chief Compliance Officer may be reached by phone: (703) 657-6060.

* Source: <https://www.afcpe.org/news-and-publications/the-standard/2018-3/the-power-of-accountability/>

Spire Wealth Management, LLC is a Federally Registered Investment Advisory Firm. Securities offered through an affiliated company, Spire Securities, LLC., a Registered Broker/Dealer and member FINRA/SIPC.

All information is based on sources deemed reliable but no warranty or guarantee is made as to its accuracy or completeness. **macrocast™** and **microcast™** are proprietary indices used by Corbett Road Wealth Management to help assist in the investment decision-making process. Neither the information provided by **macrocast™** or **microcast™** nor any opinion expressed herein constitutes a solicitation for the purchase or sale of any securities, and should not be relied on as financial advice. The phrase "the market" refers to the S&P 500 Total Return Index unless otherwise stated. The phrase "risk assets" refers to equities, REITs, high yield bonds, and other high volatility securities. Past performance is no guarantee of future results.

Risk analysis questionnaire and risk score are provided through Nitrogen. Returns range expectations are derived by taking the individual holdings past performance and projecting returns within 95% probability level.

There can be no assurance that any investment product or strategy will achieve its investment objective(s). Investing involves risk, including the entire loss of principal invested. Diversification neither assures a profit nor guarantees against loss in a declining market.

GARP is an equity investment strategy that seeks to combine views of both growth investing and value investing. Return on Equity is the measure of financial performance calculated by dividing net income by shareholder's equity. Value Methodology seeks stocks that tend to outperform in a specific part of the economic cycle.

Corbett Road Investment Management (CRIM) is a Subchapter S Corporation affiliated with Spire Wealth Management, LLC, an independent registered investment advisor. CRIM claims compliance with the Global Investment Performance Standards (GIPS®). Valuations are computed and performance is reported in U.S. dollars. A complete list of composite descriptions is available upon request. Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request. To obtain a compliant presentation for the associated strategy, please contact us at 703.748.5833 (local) or 888.737.8907 (toll free).

Investing involves risk, including possible loss of principal. Diversification does not ensure profits or prevent losses. The Fund's return may not match or achieve a high degree of correlation with the return of the Index. The Fund is non-diversified; to the extent the Fund's investments are concentrated in or have significant exposure to a particular issuer, industry or group of industries, or asset class, the Fund may be more vulnerable to adverse events affecting such issuer, industry or group of industries, or asset class than if the Fund's investments were more broadly diversified. Issuer-specific events, including changes in the financial condition of an issuer, can have a negative impact on the value of the Fund.

There is no guarantee that the Sub-Adviser's allocation techniques and decisions will produce the desired results. Investments in non-U.S. securities involve certain risks that may not be present with investments in U.S. securities including foreign currency fluctuations or to expropriation, nationalization or adverse political or economic developments, relatively low market liquidity and decreased publicly available information. Non-U.S. issuers may also be subject to inconsistent and potentially less stringent accounting, auditing, financial reporting and investor protection standards than U.S. issuers.

A new or smaller fund is subject to the risk that its performance may not represent how the fund is expected to or may perform in the long term. In addition, new funds have limited operating histories for investors to evaluate and new and smaller funds may not attract sufficient assets to achieve investment and trading efficiencies.

Shares are bought and sold at market price (closing price) not net asset value (NAV) and are not individually redeemed from the Fund. Market price returns are based on the midpoint of the bid/ask spread at 4:00pm Eastern Time (when NAV is normally determined) and do not represent the return you would receive if you traded at other times.



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