

## **FORM ADV PART 2A: FIRM BROCHURE**

**September 18, 2018**



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This brochure provides information about the qualifications and business practices of ReDefine Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 303.495.5540 and/or [info@redefine-wm.com](mailto:info@redefine-wm.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

ReDefine Wealth Management, LLC is registered as an Investment Adviser with the Colorado Division of Securities. Registration with any state or federal regulatory division does not imply any level of skill or training.

Additional information about ReDefine Wealth Management, LLC is also available on the SEC's website and can be obtained by referencing CRD# 290054.

**Summary of Material Changes**

Redefine Wealth Management, LLC (“RWM”) is required to advise you of any material changes to our Firm Brochure (“Brochure”) from our last annual update which occurred on March 23, 2018. Since RWM’s last ADV annual update:

- Item 4.A has been updated to reflect change of firm registration from the United States Securities and Exchange Commission to the Colorado Division of Securities;
- Item 4.E has been updated to reflect regulatory assets under management as of July 31, 2018 of \$54,000,000

**Full Brochure Available**

Whenever you would like to receive a complete copy of RWM’s Firm Brochure and/or Supplement Brochure, please contact us at 303.495.5540 or [info@redefine-wm.com](mailto:info@redefine-wm.com).

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## **ITEM 4      ADVISORY BUSINESS**

ReDefine Wealth Management, LLC (“RWM” or the “Firm”) is an Investment Adviser registered with the Colorado Division of Securities. RWM was originally registered as an Investment Advisor in October 2017. RWM’s current business activity consists of providing investment advisory services with respect to securities and other financial instruments to individuals and institutions.

Jeff J. Nuttall and Jason F. Inglis are the primary owners and operators of the company, and both are Colorado residents.

### **TYPES OF ADVISORY SERVICES**

RWM provides ongoing investment advisory and management services, with respect to investments in securities, financial instruments and/or other assets, to individuals, families, trusts, estates, conservatorships, foundations, endowments, corporations or business entities and pension and profit-sharing plans, charitable organizations, public funds, investment limited partnerships, 401(k) self-directed accounts, IRAs and retirement plans, based on their individual needs. RWM generally expects to have discretionary authority with respect to investment decisions made on behalf of the client.

RWM, may in certain circumstances, provide sub-advised investment management services to unaffiliated registered investment advisors.

In certain circumstances, RWM will conduct financial and wealth planning for clients at no extra charge or fee. Even if a formal plan is not developed, RWM tailors and manages investment portfolios according to the specific financial objectives, taxability, and risk tolerance of the client, gathered through discussions in which goals and objectives based on a client's particular circumstances are established. Client accounts will be managed by RWM in accordance with the investment objectives, strategies, guidelines, restrictions and limitations set forth in the investment advisory agreement and/or other applicable account documents.

RWM does not assume any responsibility for the accuracy of the information provided by the client and is not obligated to verify any information received from the client or from the client’s other professionals (e.g. attorney, accountant, or other such professional).

Under all circumstances, clients are responsible for promptly notifying RWM in writing of any material changes to the client’s financial and investment objectives, taxability, time horizon, or risk tolerance.

#### **Non-Tailored Relationships**

**RWM MAY PROVIDE INDIVIDUALIZED ADVICE TO CLIENTS AND/OR ALLOW FOR INDIVIDUALIZED CLIENT RESTRICTIONS. ACCORDINGLY, CLIENTS SHOULD CONSIDER WHETHER THE ADVISOR’S OBJECTIVES AND STRATEGIES MEET THEIR OBJECTIVES AND RISK TOLERANCE PRIOR TO INVESTING.**

The performance of each client's portfolio may be different due to factors such as type of strategy employed, timing of account opening, cash inflows and outflows, and type of account (e.g. retirement accounts have certain restrictions).

***Reasonable Restrictions.*** Clients may request reasonable restrictions regarding investments that may be held in their portfolios. Where client assets are to be managed by outside investment managers, RWM will confer with those managers about their ability to abide by any client-requested restrictions or accommodations. If RWM manages the client assets directly, RWM will accept client-imposed restrictions provided that, in our opinion, such restrictions are reasonable and would not unduly interfere with our ability to provide the investment advisory service necessary to facilitate achievement of the client's goals. In either circumstance, if it is determined that a client-requested restriction cannot be accommodated, the client will be notified so as to have the opportunity to modify the requested restriction and/or consider other investment options.

### **Wrap Fee Brochures**

Under certain circumstances, RWM may offer clients of a group of services for one all-inclusive fee, known as a "wrap fee." For more information, please refer to the Firm's separate Wrap Fee Program Brochure.

### **Assets Under Management**

As of the date of this Brochure filing, RWM provides continuous management services for \$52,000,000 in client assets on a discretionary basis and \$2,000,000 non-discretionary basis.

## **ITEM 5 FEES AND COMPENSATION**

### **Description and Billing**

RWM is compensated for its services by an annual advisory fee charged to its advisory clients based on a percentage of assets being advised. Advisory fees are in certain circumstances, negotiable. RWM's Fees are described in detail and agreed upon in an investment advisory contract with each client. RWM's fees are negotiable and may vary by client relationship, a general summary of our fee schedule is set forth below.

<b><u>Market Value of Portfolio</u></b>	<b><u>% of Assets</u></b>
Under \$2,000,000	1.25%
\$2,000,001 to \$ 10,000,000	1.15%
\$10,000,001 to \$25,000,000	1.00%
\$25,000,001 to \$50,000,000	0.90%
Over \$50,000,001	0.75%

## **Payment of Fees**

Asset-based Advisory Fees are prorated and deducted from client assets quarterly in advance. Advisory Fees for the following calendar quarter are calculated based on a percentage of the client's asset value at the end of the most recent calendar quarter. Unless otherwise directed by the client, RWM's annual advisory fee shall be debited from the client's account on a quarterly basis or as agreed upon and authorized in the written investment advisory agreement. For more information concerning direct deduction, please see Item 15. RWM does not maintain physical possession or custody of the funds or securities of any client.

## **Other Fees**

In addition to RWM's investment advisory fees, clients are also responsible for the fees and expenses charged by custodians and/or broker dealers, including, but not limited to, custodial fees for recordkeeping and safekeeping of client's assets.

BNY Mellon Pershing ("Pershing") serves as custodian for client investment management assets. Custodians may charge brokerage commissions and/or transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and fixed income securities transactions). RWM does not permit clients to trade away from Pershing.

In addition to RWM's annual advisory fee clients will also incur charges imposed at the fund level, relative to all mutual fund, SMA, and ETF purchases, (e.g. management fees and other fund expenses).

***Mutual Fund Fees:*** RWM's investment advisory fees are separate from the fees and expenses charged by mutual funds, SMAs, and/or ETFs. These fees and expenses are described in each fund's prospectus. A client could invest in a mutual fund directly, without RWM's services. In that case, the client would not receive RWM's services. To the degree that RWM uses these products, RWM looks to maximize value for the fees paid to the provider.

### **Termination of the Advisory Relationship**

An investment advisory agreement may be canceled at any time by the client for any reason, upon receipt of written notice. RWM may cancel at any time according to the terms specified in the investment advisory agreement. In the case of termination of the advisory relationship before the end of the billing period, RWM will refund any unearned fees paid in advance, prorated or otherwise, within 30 days of termination date.

### **Outside Compensation for the Sale of Securities**

Neither the Firm nor its supervised persons accepts compensation for the sale of securities or other investment products outside of its association with the Firm.

## **ITEM 6 PERFORMANCE-BASED FEES**

RWM does not charge performance-based fees to clients and therefore does not engage in side by side management.

## **ITEM 7 TYPES OF CLIENTS**

RWM offers investment management services to individuals and institutional clients through separately managed accounts

### **Conditions for Account Management**

RWM generally pursues clients with \$10 million or more in net worth and \$2 million in investment advisory assets. However, at its sole discretion, RWM may charge a lesser annual advisory fee or waive the stated client minimums based upon various factors, including, for example, anticipated future earning capacity, anticipated future assets, historical relationship, client investment experience, related accounts, account composition, negotiations with client, accounts referred to adviser by another professional, etc.

Clients will be required to sign investment advisory agreements (and/or other contractual arrangements) that, among other things, set forth the nature and scope of our investment advisory and management authority, specific services, and the investment objectives, guidelines and restrictions applicable to the management of client accounts.

## **ITEM 8        METHODS OF ANALYSIS, INVESTMENTS STRATEGIES & RISK OF LOSS**

### **Methods of Analysis**

RWM believes the greatest market risks to wealth are those rare, tail-risk events associated with major market downturns and global recessions. Analysis of global macroeconomic conditions and regional public policy decision making helps RWM to identify events that may affect asset prices, interest rates, and currencies. This type of volatility can cause inflation shocks, economic recessions, and other primary drivers of these rare, tail-risk events. RWM's goal is to grow capital during positive markets, while mitigating the negative impact from destructive tail-risk events.

***Macroeconomic*** - analysis performed on economic phenomena such as inflation, price levels, rate of growth, national income, GDP, and changes in unemployment.

***Charting*** - analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices.

***Fundamental*** - analysis performed on historical and present data, with the goal of making financial forecasts.

***Technical*** - analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices.

***Cyclical*** - analysis performed on historical relationships between price and market trends, to forecast the direction of prices.

The methods above are not intended to be comprehensive.

***Risks for All Forms of Analysis.*** RWM's analysis methods rely on the assumption that the companies whose financial instruments RWM purchases and sells, the rating services and agencies that evaluate these financial instruments, and other publicly available sources of information about these financial instruments are providing accurate and unbiased data. While RWM is alert to indications that data may be incorrect, there is always a risk that RWM's analysis may be compromised by inaccurate or misleading information. Moreover, securities are often priced on factors that cannot be predicted, such as emotional and behavioral factors of other market participants.

***General Economic and Market Conditions.*** The success of RWM's investment strategies and recommendations are affected by general economic and market conditions, such as changes in interest rates, availability of credit, competition, industry conditions, inflation rates, economic uncertainty, changes in laws (including laws relating to taxation of client investments), trade barriers, unemployment rates, release of economic data, currency exchange controls and national and international political circumstances (including wars, terrorist acts, natural disasters, or security operations).



These factors may affect the level and volatility of securities prices and the liquidity of client investments. Volatility and/or illiquidity could impair a client's profitability or result in losses. Clients could incur material losses even if we react quickly to difficult market conditions, and there can be no assurance that clients will not suffer material losses and other adverse effects from broad and rapid changes in economic and market conditions in the future. Clients should realize that markets for the financial instruments in which we seek to invest on behalf of our clients can correlate strongly with each other at times or in ways that are difficult for us to predict. Even a well-analyzed approach may not protect clients from significant losses under certain market conditions.

***Interest Rate Risk.*** Changes in interest rates can affect the value of the client's investments. Increases in interest rates may cause the value of investments to decline. The client may experience increased interest rate risk to the extent it invests in lower rated securities, debt securities with longer maturities, debt securities paying no interest, such as zero coupon securities, or debt securities paying non-cash interest in the form of other debt securities (pay-in-kind securities).

**RISK OF LOSS - THERE IS NO GUARANTEE THAT RECOMMENDED INVESTMENTS OR THE INVESTMENT STRATEGIES DISCUSSED HEREIN WILL BE SUCCESSFUL. INVESTING IN SECURITIES INVOLVES THE RISK OF LOSING MONEY, AND CLIENTS SHOULD BE PREPARED TO BEAR THE LOSS OF ALL OR A SIGNIFICANT PORTION OF THEIR INVESTED MONEY.**

### **Investment Strategy and Risk**

RWM will generally suggest a ratio of investments (i.e. equities, fixed income, real assets, alternatives, cash, etc.) that seem appropriate to the client's individual circumstances and the relative long-term attractiveness of the various asset classes.

RWM will generally seek to construct a portfolio targeting attractive risk-adjusted returns for each client through strategies that employ a strategic blend of asset classes and both active and passive management. The securities and other financial instruments in which RWM may invest include, but are not limited to, exchange listed securities, foreign securities, warrants, corporate debt securities, certificates of deposit, municipal securities, mutual funds, United States government securities, options on securities among other types of investments.

The main investment strategy that RWM employs is based upon the global macroeconomic approach to investing. This is based on theory that markets are directed by central bank activity and government policies, which then affect asset prices. RWM attempts to invest in assets through this lens that it believes to be undervalued based upon potential future market action.

The investment strategy above is not intended to be comprehensive.

***General Strategy Risk Factors.*** RWM may provide personalized investment advisory services or other personalized advice. Clients should consider whether RWM's investment objectives and strategies meet their objectives and risk tolerance prior to investing.

The performance of each client's portfolio may be different due to factors such as type of strategy employed, timing of account opening, cash in-flows and out-flows, and type of account (for example, retirement accounts have certain restrictions).

**Limited Diversification.** The portfolio will have limited diversification. Limited diversification increases exposure to idiosyncratic risk (i.e. security-specific/company-specific risk). This concentration could expose client accounts to losses disproportionate to market movements in general if there are disproportionately greater adverse price movements in selected investments.

**Long-Biased Investment Program.** RWM's strategy has a long-exposure bias making it more likely that adverse changes in the overall market will result in a decline in the value of a client's account. The Firm's hedging strategies should not be viewed as insulating a client from risks attendant to investing in the market as a whole.

**Concentration.** RWM intends to concentrate its portfolio in a relatively limited number of investments because it believes that (i) there are a limited number of materially mispriced securities available in the marketplace at any one time and (ii) the marginal benefits of diversification must be weighed against the marginal cost of allocating capital to less attractive investments.

**Leverage Risk.** To a limited extent, the Firm may increase the number and extent of the portfolio's "long" positions by borrowing (e.g. by purchasing securities on margin). RWM intends to utilize margin in order to provide short-term liquidity to clients instead of exiting positions. While leverage presents opportunities for increasing total return, it has also the effect of increasing losses. Accordingly, any event which adversely affects the value of an investment held within an account would be magnified to the extent the account is leveraged. The cumulative effect of the use of leverage by an account in a market that moves adversely to the account's investments could result in a loss greater than the client's investment to the account which would be greater than if the account were not leveraged.

**Bunched Orders.** When possible, RWM typically places bunched orders with regard to trades entered into on behalf of clients. A bunched order is a group of orders for more than one client entered as one order. Bunched orders will be allocated to client accounts in a systematic manner according to the procedures in place with the custodian (discussed in Item 12). The custodian's back office will facilitate this process.

## **Types of Securities**

RWM monitors a wide variety of variables including broad economic trends and financial markets worldwide in order to identify both risks and long-term opportunities. In its investment selection process, RWM conducts independent research on financial instruments for potential investment. In addition, RWM utilizes a variety of other sources including industry data, economic information, and research from various brokerage firms as well as independent sources.

Risk factors relevant to the specific securities utilized include:

**Equity Securities.** The value of the equity securities are subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and risky than some other forms of investments.

**Exchange Traded Funds.** ETFs are a recently developed type of investment security, representing an interest in a passively managed portfolio of securities selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector. Shares of ETFs are not purchased and redeemed by investors directly with the fund, but instead are purchased and sold through broker-dealers in transactions on a stock exchange. Because ETF and closed-end fund shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index bear the risk that the ETF's performance may not correctly replicate the performance of the index. Investors in ETFs, closed-end funds and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and other transaction costs.

**Leveraged Exchange Traded Funds.** ETFs may use leverage, which may amplify gains and losses. Most leveraged ETFs reset their leverage daily. Due to the effect of compounding, their performance over longer periods of time can differ significantly from the performance of their underlying index or benchmark during the same period of time. RWM intends to invest in leveraged ETFs as short-term trading vehicles to hedge another position or take advantage of a perceived market mispricing.

**Mutual Fund Shares.** Some of the risks of investing in mutual fund shares include: (i) the price to invest in mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the fund imposes at the time of purchase (such as sales loads), (ii) investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs, and (iii) investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

**Options.** Buying and selling either call or put options entails significant risks. Although an option buyer's risk is limited to the amount of the option's purchase price, an option may be subject to greater fluctuation than an investment in the underlying investment. The use of leverage available in trading options may yield greater profits or greater losses than trading in the underlying securities would. The risk in options if buying puts or calls is that they can expire worthless.

***Credit Risk.*** The issuer of a debt security, may, in certain circumstances, be unable or unwilling to make timely principal and/or interest payments, or to otherwise honor its obligations. The degree of risk for a particular security may be reflected in its credit rating. Credit risk is greater for medium quality and lower-rated securities.

**THE FOREGOING LIST OF RISK FACTORS DOES NOT PURPORT TO BE A COMPLETE ENUMERATION OR EXPLANATION OF THE RISKS INVOLVED WITH INVESTING WITH RWM. PROSPECTIVE CLIENTS SHOULD READ THE ENTIRE BROCHURE, THE AGREEMENT AS WELL AS OTHER MATERIALS THAT MAY BE PROVIDED BY RWM AND CONSULT WITH THEIR OWN ADVISERS BEFORE DECIDING TO ENTER INTO AN AGREEMENT WITH THE FIRM.**

#### **ITEM 9 DISCIPLINARY INFORMATION**

Neither the Firm nor its employees have been involved in legal or disciplinary events related to past or present investment clients.

#### **ITEM 10 OTHER FINANCIAL ACTIVITIES AND INDUSTRY AFFILIATIONS**

RWM does not have any arraignments with material third parties, however RWM personnel may be licensed insurance agents. Personnel who are insurance licensed may have incentive to recommend insurance products for which they would receive additional compensation. Although clients are under no obligation to purchase insurance products recommended by RWM IAR's, in their separate capacity as insurance agents, RWM IAR's are able to offer such products should the need arise. When insurance products are purchased, commissions are paid to the IAR in their separate capacity as an insurance agent. To mitigate this conflict of interest and consistent with RWM's fiduciary duty, our IAR's strive to recommend insurance products to only those clients that need new or additional policies. Commissions earned for selling insurance products are always separate from advisory fees charged by RWM. Due to our fiduciary status, recommendations will only be made in the client's best interest, and (i) the client has the right to decide whether or not to act on the advice being offered and (ii) if a client does opt to act upon the advice, the client has the right to affect an insurance transaction with any insurance agent of their choice.

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

### **Code of Ethics**

RWM has adopted a Code of Ethics (the “Code”), which, among other things, (i) describes the standards of business conduct RWM requires of employees; (ii) governs the personal securities transactions of RWM employees (iii) governs the treatment and forbids the use of material nonpublic information by the Firm’s employees, and (iv) requires all supervised persons to report any violations of the Code to the Firm’s Chief Compliance Officer.

The Code provides that (i) RWM will act in the clients’ best interest and that clients’ interests come before the Firm’s or employees’ interests; (ii) RWM must disclose to clients all material facts about conflicts of which it is aware between the Firm’s and its employees’ interests on the one hand and clients’ interests on the other; (iii) employees must operate consistently with RWM’s disclosures to and arrangements with clients regarding conflicts and its efforts to mitigate the impacts of those conflicts; (iv) RWM and its employees must not take inappropriate advantage of the Firm’s clients or their positions of trust with or responsibility to clients; and (v) RWM and its employees must comply with all applicable securities laws.

The Code requires employees to report personal securities holdings on no less than an annual basis. In addition, the RWM monitors all employees’ securities transactions. Employees must arrange for duplicate copies of their brokerage statements and trade confirmations to be sent to the Chief Compliance Officer. The Code includes procedures for and restrictions on employee trading intended to prevent employees from benefiting from, or appearing to benefit from, any price movement that may be caused by client transactions or RWM’s recommendations regarding securities. Among other things, these include certain pre-clearance requirements. The Code also contains restrictions on and procedures to prevent inappropriate trading while the Firm is in possession of material nonpublic information.

The Firm will provide a copy of its Code of Ethics to any client or prospective client upon request. Such a request may be made by submitting a written request to RWM at the address on the cover page to this brochure.

### **Participation of Interest in Client Transactions**

As noted in Item 5, RWM earns a Management Fee for providing advisory services to its clients. It does not act as a principal in any transaction with its clients.

### **Personal Trading**

Generally, all accounts of RWM’s related persons (which include officers and employees of the Firm) are managed by RWM. Therefore, RWM and related persons of RWM may buy or sell securities for themselves that RWM buys or sells for clients.

RWM recognizes that the personal investment transactions of related persons of the Firm demand the application of a high code of ethics and will require that all such transactions be carried out in a way that does not disadvantage the trading of any client account (see discussion regarding the Firm’s Code of Ethics above).

At the same time, RWM believes that its clients derive a significant benefit from an alignment of interests between the related persons of RWM and its clients. To achieve this alignment of interests, RWM generally manages the accounts of related persons similarly to the way that it manages the accounts of its clients. This may naturally result in the related persons of RWM owning substantially the same securities as clients own. In order to address any conflicts of interest that may arise, the Firm has adopted a set of procedures with respect to transactions effected by its related persons for their personal accounts, which include documenting any transactions that could be construed as conflicts of interest and acting to promote the best interests of the clients.

### **Simultaneous Trading**

As stated above, RWM and related persons of the Firm may buy or sell securities for themselves that RWM also buys or sells for clients. These transactions occur concurrently with all other client transactions. Please see Item 12.B. for more information about order aggregation for client accounts and the accounts of related persons. RWM will always document any transactions that could be construed as conflicts of interest and act to promote the best interests of the clients.

## **ITEM 12      BROKERAGE PRACTICES**

RWM requires clients to use Pershing as their custodian. RWM endeavors to select those custodians that will provide the best services for the best value. The reasonableness of commissions is based on the broker's stability, reputation, ability to provide professional services including trade execution, competitive commission rates and prices, research, trading platform, and other services that will help RWM in providing investment management services to clients. RWM may therefore recommend or use a broker who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Research services may not be useful in servicing all of RWM's clients, and not all such research may be useful for the account for which the particular transaction was effected.

### **Research and Other Soft Dollar Benefits**

The Firm has not utilized any particular procedures to direct investment strategies transactions in return for products and research services. RWM receives certain benefits by having clients at Pershing and believes the fees charged by Pershing are appropriate in light of services received. To mitigate any conflicts of interest, RWM reviews the fees and services provided by the custodian every three years.

However, if and when it does, RWM intends to comply with the “safe harbor” of Section 28(e) of the Securities Exchange Act of 1934, as amended. Under “soft dollar” arrangements, one or more of the brokerage firms would provide or pay the costs of certain services, equipment, or other items for the benefit of RWM. These soft dollar arrangements may benefit RWM by reducing its expenses. Nonetheless, RWM believes that to the extent it makes allocations to brokerage business with soft dollar arrangements, this would generally enhance the ability to obtain research, optimal execution and other benefits on behalf of the Firm’s Clients.

### **Services That Benefit RWM**

Pershing makes available to RWM other products and services that benefit RWM but may not directly benefit the Firm's Clients. These products and services may include software and other technology that:

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

Pershing also offers other services intended to help RWM manage and further develop its business enterprise. These services may include:

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

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

### **Order Aggregation**

RWM performs investment management services for multiple clients. When possible, portfolio transactions are typically executed as part of concurrent authorizations to purchase or sell the same security for all accounts served by the Firm. Concurrent authorizations will be affected only when the Firm believes that to do so will be in the best interest of all such accounts. When such concurrent authorizations occur, the objective will be to allocate the executions in a manner which is deemed equitable to the accounts involved. Allocations to client accounts and the accounts of related persons will be made in a systematic, non-preferential manner. Allocations are expected to be made pursuant to the average pricing method.

## **ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

### **Frequency and Nature of Periodic Review and Who Makes Those Reviews**

For those clients to whom RWM provides investment supervisory services, account reviews are conducted on an ongoing and periodic basis by RWM's Principals and representatives. All investment advisory clients are advised that it remains their responsibility to advise RWM of any changes in their investment objectives, tax status, and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), tax status, investment objectives, and account performance with RWM on an annual basis at a minimum.

Securities held across client accounts are reviewed by RWM on a weekly basis and all accounts are reviewed monthly at a minimum. Reviews will be held with clients based on client preference, but no less than annually.

### **Factors That Will Trigger a Non-Periodic Review of Client Accounts**

RWM may conduct account reviews on other than a periodic basis upon the occurrence of a triggering event, including but not limited to a change in client investment objectives, tax status, and/or financial situation, market corrections and client request.

### **Content and Frequency of Regular Reports**

Generally, the custodian will provide on-demand access to data and account balances through an online interface available on the custodian's website. Additionally, clients are provided, at least quarterly, with written or (upon client consent) digital transaction confirmation notices and regular summary account statements directly from the custodian. Clients are advised to carefully review and compare statements provided by the custodian. Clients need to compare custodial statements to the reports and invoices provided by RWM. RWM provides client access to robust reporting tools, is able to generate customized reports, as well as a quarterly report summarizing account activity, balances, holdings, and performance.

### **Economic Benefits from Others**

RWM does not receive an economic benefit from others other than the soft dollar benefits received from Pershing as described in Item 12 above.

### **Compensation to Unaffiliated Third Parties**

RWM does not compensate any third parties for referrals.

## **ITEM 15 CUSTODY**

### **Custodian of Assets**

RWM does not maintain physical possession or custody of funds or securities of any client. Custody of client funds or securities will be maintained with a qualified custodian as described in Item 12. Clients will open an account with the custodian and will expressly authorize the custodian to accept trading instructions from the Firm. All transactions will be made in the client's name.

Generally, the custodian will provide real time performance data and account balances through an online interface available on the custodian's website. Additionally, each client will receive written statements detailing the portfolio performance no less than quarterly from the custodian. The client may authorize in advance in writing that RWM may instruct the custodian to deduct advisory fees directly from their account(s). RWM will send the client an invoice concurrently instructing the custodian to process the deduction. Clients are advised to carefully review and compare reports and invoices provided by the Firm and the statements provided by the custodian.



## **ITEM 16 INVESTMENT DISCRETION**

The client can determine to engage RWM to provide investment advisory services on a discretionary basis. Prior to RWM assuming discretionary authority over a client's account, the client shall be required to execute our Investment Advisory Agreement, granting RWM full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage RWM on a discretionary basis may, at any time, impose restrictions, in writing, on RWM's discretionary authority. (i.e., limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe RWM's use of margin, etc.).

## **ITEM 17 VOTING CLIENT SECURITIES**

RWM is not responsible for voting client proxies. Clients receive their proxies or other solicitations directly from the custodian or a transfer agent, and from RWM - if proxies are received by RWM in error.

If clients have questions regarding proxies, they should contact us 303.495.5540 or [info@redefine-wm.com](mailto:info@redefine-wm.com).

## **ITEM 18 FINANCIAL INFORMATION**

### **Balance Sheet Requirement**

Under no circumstances will RWM require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, RWM is not required to include a financial statement.

### **Financial Condition**

The registrant has no financial commitments that impair its ability to meet contractual and fiduciary commitments to clients and has not been the subject of bankruptcy proceedings.

### **Bankruptcy Petition**

RWM has never been the subject of a bankruptcy petition.

## **ITEM 19 STATE REGISTERED INVESTMENT ADVISER INFORMATION**

Jeffrey J. Nuttall and Jason F. Inglis are the principals and officers of ReDefine Wealth Management. For their formal education, business background, please refer to ADV Part 2B.

### **Other Business**

The Adviser does not engage in any other business or provide any other services other than those described in Part 2A of this ADV brochure.

### **Performance Fees**

Fees are not based on a share of the capital gains or capital appreciation of managed securities. However, the Adviser may employ certain types of investments that do charge a performance fee in which the Adviser does not participate. For these investments, refer to their offering or private placement memorandum for an explanation and amounts of the performance fees.

### **Management/Officer/Principal Disclosures**

No member of management, an officer or a principal of the Adviser has been involved in an award or otherwise found liable in an arbitration claim alleging damages in excess of \$2,500 in an activity involving investment or investment related activity; fraud, false statements or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; dishonest, unfair or unethical practices.

Further, no member of management, an officer or a principal of the Adviser has been found liable in a civil, self-regulatory organization or administrative proceeding involving investment or investment related activity; fraud, false statements or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; dishonest, unfair or unethical practices.

## **PRIVACY POLICY**

ReDefine Wealth Management, LLC (“RWM”) recognizes the importance of protecting its clients’ non-public information, and is committed to maintaining the confidentiality, integrity and security of its current and former clients’ non-public information.

RWM collects information about its clients (such as name, address, social security number, assets and income) from discussions with clients, documents provided by clients, and in the course of providing service to our Clients.

RWM will not disclose non-public information about its clients except as necessary to carry out transactions the client has requested or authorized in connection with RWM's services, as required by law, or to non-affiliated third parties who assist RWM in administering client accounts. Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation and is not permitted to share or use this information for any other purpose.

RWM restricts access to its clients’ non-public information to those employees who need to know such information in order to provide products or services to its clients. RWM maintains physical, electronic, and procedural safeguards that comply with federal standards to guard each client’s non-public information.