

Indelible Wealth Group, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: February 7, 2024

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Indelible Wealth Group, LLC (“IWG” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (970) 532-5842 or by email at jason@indeliblewealth.com.

IWG is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about IWG to assist you in determining whether to retain the Advisor.

Additional information about IWG and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm name or CRD# 166864.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of IWG. For convenience, the Advisor has combined these documents into a single disclosure document.

IWG believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. IWG encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor is transitioning from a state-registered advisor to an advisor registered with the U.S. Securities and Exchange Commission ("SEC").

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 166864.

You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (970) 532-5842 or by email at jason@indeliblewealth.com.

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Item 4 – Advisory Services

A. Firm Information

Indelible Wealth Group, LLC (“IWG” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission. The Advisor is organized as a Limited Liability Company (“LLC”) under the laws of Colorado. IWG was founded in January 2012, and is owned and operated by Jason M. Brooks (President and Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by IWG.

B. Advisory Services Offered

IWG offers investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. IWG’s fiduciary commitment is further described in the Advisor’s Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Wealth Management Services

IWG provides Clients with wealth management services, which generally includes a broad range of comprehensive financial planning services in connection with management of investment portfolios. These services are described below.

Investment Management Services – IWG provides customized investment advisory solutions for its Clients as a component of its wealth management services. This is achieved through continuous personal Client contact and interaction while providing discretionary and/or non-discretionary investment management and consulting services. IWG works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. IWG will then construct a portfolio based on the underlying philosophy of the modern portfolio theory. IWG will utilize five portfolios (Aggressive, Moderately Aggressive, Moderate, Moderately Conservative, and Conservative), to which the Advisor will offer to include Client specific strategies. Core investments will consist of broad-based index funds, exchange-traded index funds (“ETFs”) or open-end mutual funds in the case of less efficient markets. Bond exposure will be achieved with either individual bonds or bond funds.

IWG’s investment approach is primarily long-term focused, but the Advisor may recommend to buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. IWG will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

IWG evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. IWG may recommend, on occasion, redistributing investment allocations to diversify the portfolio. IWG may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. IWG may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will IWG accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

Retirement Accounts – When deemed to be in the Client’s best interest, the Advisor will recommend that a Client take a distribution from an ERISA sponsored plan or to roll over the assets to an Individual Retirement Accounts (“IRAs”), or recommend a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

Financial Planning Services – IWG will typically provide a variety of financial planning services to individuals and families either as a component of wealth management services or pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals and objectives. Generally, such financial planning services will involve preparing a financial plan based on the Client’s financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings and other areas of a Client’s financial situation.

A financial plan developed for rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. IWG may also refer Clients to an accountant, attorney or other specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client’s financial situation, observations, and recommendations. For ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Retirement Plan Advisory Services

IWG will work with businesses and nonprofits (the “Plan Sponsor”) to develop, design and implement a retirement savings plans (each “Plan”) for its employees (the “Plan Participants”). IWG provides objective financial advice to Plan Sponsors regarding issues involving benefit plan options, wealth accumulation strategies for Plant Participants and education. IWG will evaluate a Plan Sponsor’s current plan and recommend changes, if necessary. IWG may also provide consulting regarding new plans for companies that have not previously offered retirement plan benefits. IWG offers retirement plan advisory services on a non-discretionary basis. These services may include:

- Investment Policy Statement Development – A written investment policy statement is the only way to demonstrate a thoughtful process that helps ensure that investment decisions are prudent and well informed. IWG will help you develop your overall investment policy approach and create your Investment Policy Statement, which describes the procedures and metrics used to manage the investment process.
- Monitoring and Reporting Key Metrics - Monitoring investments is an essential part of discharging your fiduciary responsibilities. Performance monitoring and reporting can assist you in making sure your investment decision-making is in line with your investment policy. IWG will assist you by tracking key metrics to confirm investment performance adheres to your Investment Policy Statement, identifying any areas of concern, and recommending changes as necessary.

- Ongoing Fiduciary Governance – If you are to have sound fiduciary discharge of your duties, you must establish a sound fiduciary governance system. IWG will help you develop and implement the optimal organization and governance design for your plan.
- Vendor Search & Selection – Selecting your 401(k) vendor is a serious fiduciary obligation. IWG will assist in you developing your selection methods, guide you through the evaluation process, provide you a written recommendation, and help you manage the implementation process once you've made your decision.
- Fee Assessment/Negotiation – As an ERISA fiduciary you have an obligation to ensure that your plan's fees and expenses are reasonable in light of the level and quality of services being provided. Typically, plan sponsors lose track of the total plan expenses. IWG will help you uncover and document all the fees (both obvious and difficult) associated with your plan and recommend specific steps you can take to reduce those fees, if applicable. When appropriate, we will assist you in negotiating the fee arrangements.
- Education of Employees – In order to fulfill your fiduciary duties to your plan participants (and in order to provide a valuable benefit for your employees), you need to have a benefits education structure in place. IWG will assist in providing both online and on-site education for your organization.

C. Client Account Management

Prior to engaging IWG to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – IWG, in connection with the Client, will develop an investment strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – IWG will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk of each Client.
- Portfolio Construction – IWG will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – IWG will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

IWG does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by IWG.

E. Assets Under Management

As of December 31, 2022, IWG manages approximately \$120,361,359 in Client assets, \$101,384,325 of which are managed on a discretionary basis and \$18,977,034 on a non-discretionary basis. Clients may request current values by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of IWG and the Client.

A. Fees for Advisory Services

Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined investment advisory fee for investment management and financial planning services based on the market value of assets under management as reflected below.

Investment Management Services

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Investment advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the average of the daily closing values of the assets under management at the end of each calendar quarter. Investment advisory fees for investment management services range up to 1.50% annually. The Advisor generally imposes a minimum annual fee as outlined in Item 7 – Types of Clients, which may be waived at the sole discretion of the Advisor.

Fees may be negotiable at the sole discretion of the Advisor. Fees for investment management services are based on several factors, including: the complexity of the services to be provided, the inclusion of financial planning services, the level of assets to be managed, and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by IWG will be independently valued by the Custodian. IWG will not have the authority or responsibility to value portfolio securities. The Client may be able to attain similar services for a lower fee from other service providers.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning Services

IWG offers stand-alone financial planning services on an hourly basis at a rate of up to \$250 per hour or for a fixed fee ranging up to \$2,500 per engagement. Financial planning fees may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours and/or costs will be determined prior to engaging for these services.

Retirement Plan Advisory Services

Fees for retirement plan advisory services paid quarterly, at the end of each calendar quarter, pursuant to the terms of retirement plan advisory agreement. Fees may be negotiable depending on the size and complexity of the Plan. The Plan fees are based on the market value of assets under management at the end of the calendar quarter and are generally based on the following fee schedule:

Assets Under Management	Annual Rate
Up to \$500,000	0.65%
\$500,001 to \$2,500,000	0.50%
\$2,500,001 to \$5,000,000	0.40%
\$5,000,001 and above	0.25%

B. Fee Billing

Investment Management Services

Investment advisory fees are calculated by the Advisor and deducted from the Client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The annual rate is charged quarterly, based upon the market value of the average daily account balance. Since the asset-based fee is determined by average daily account balance, if assets are deposited into or withdrawn from an account, the base fee payable with respect to such assets is adjusted accordingly. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting IWG to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning Services

Financial planning fees may be invoiced up to fifty percent (50%) of the expected total fee upon execution of the financial planning agreement. The balance shall be invoiced upon completion of the agreed upon deliverable[s].

Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than IWG, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The fees charged by IWG are separate and distinct from these custody and execution fees.

In addition, all fees paid to IWG for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of IWG, but would not receive the services provided by IWG which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by IWG to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Investment Management Services

IWG is compensated for its investment management services at the end of the quarter, after investment management services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning Services

The Advisor may be partially compensated for its financial planning services in advance. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the agreement within five (5) days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate or a percentage of completion for fixed fee engagements. Any unearned, prepaid fees will be promptly refunded to the Client. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

Retirement Plan Advisory Services

IWG is compensated for its retirement plan advisory services at the end of the quarter, after retirement plan advisory services are rendered. Either party may terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the agreement within five (5) days of signing the Advisor's retirement plan advisory agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's retirement plan advisory agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

IWG does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

IWG does not charge performance-based fees for its investment advisory services. The fees charged by IWG are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

IWG does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

IWG provides investment advisory services to individuals, high net worth individuals, trusts, estates and retirement plans. IWG generally requires an annual minimum fee that ranges between \$750 and \$1,250 based on the nature and complexity of the services to be provided. These minimums may be waived or reduced at the sole discretion of the Advisor.

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

A. Methods of Analysis

IWG primarily employs fundamental analysis and Modern Portfolio Theory in developing investment strategies for its Clients. Research and analysis from IWG are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Modern Portfolio Theory employs assumptions for future growth based on past historical trends in volatility and returns. Results may vary to the extent that future market returns are influenced by factors such as inflation rates, bond yields and price to earnings multiple of markets.

As noted above, IWG generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. IWG will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, IWG may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. IWG will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. The following are some of the risks associated the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving IWG or any of its Supervised Persons. IWG and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 166864.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

Ms. Carshon Rodgers is licensed as an independent insurance professional. Implementations of insurance recommendations are separate and apart from Ms. Rodgers role with IWG. As an insurance professional, Ms. Rodgers will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Rodgers is not required to recommend the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made the Advisor or Ms. Rodgers.

Mountain Hound, LLC

Mr. Brooks is a member of Mountain Hound, LLC, a residential real estate management firm. This activity requires limited time commitments and does not create any conflicts of interest with Mr. Brooks' responsibilities with IWG. Mr. Brooks is compensated and also performs this activity separate and apart from his role with IWG. Clients of IWG do not participate in Mountain Hound, LLC, nor are they solicited for services provided under this entity.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

IWG has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with IWG ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. IWG and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of IWG associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (970) 532-5842 or via email at jason@indeliblewealth.com.

B. Personal Trading with Material Interest

IWG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. IWG does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. IWG does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

IWG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that IWG recommends (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, IWG must disclose to Clients and mitigate through policies and procedures. As noted above, the Advisor has adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of IWG have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by IWG requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While IWG allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no**

time will IWG, or any Supervised Person of IWG, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

IWG does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize IWG to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, IWG does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where IWG does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a broker-dealer/custodian not recommended by IWG. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. IWG may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian's offices. IWG will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab") or Fidelity Clearing & Custody Solutions, a related entity of Fidelity Investments, Inc. (collectively "Fidelity"). Schwab or Fidelity will serve as the Client's "qualified custodian". IWG maintains an institutional relationships with these Custodians, whereby the Advisor receives economic benefits from Schwab or Fidelity (Please see Item 14 below.)

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **IWG does not participate in soft dollar programs sponsored or offered by the Custodian. However, the Advisor does receive certain economic benefits from the Custodian. Please see Item 14 – Client Referrals and Other Compensation.**

2. Brokerage Referrals - IWG does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where IWG will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). IWG will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. IWG will execute its transactions through the Custodian as directed by the Client. IWG may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Brooks, President and Chief Compliance Officer of IWG. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify IWG if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by IWG

IWG may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, IWG may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform (Schwab)

IWG has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like IWG. As a registered investment advisor participating on the Schwab Advisor Services platform, IWG receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with

Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

Services that May Only Benefit the Advisor – Schwab also offers other services to IWG that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a potential conflict of interest. IWG believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platform (Fidelity)

IWG has established an institutional relationship with Fidelity to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from Fidelity: reimbursement to Clients for transfer costs to the platform/custodian; financing services, receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Compensation for Client Referrals

IWG does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

Item 15 – Custody

IWG does not accept or maintain custody of any Client accounts, except for the authorized deduction of the advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct IWG to utilize the Custodian for the Client's security transactions. IWG encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

Item 16 – Investment Discretion

IWG may be granted the discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by IWG. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by IWG will be in accordance with each Client's investment objectives and goals. In certain instances, IWG may be granted discretionary authority by the Plan Sponsor on behalf of a Plan.

Item 17 – Voting Client Securities

IWG does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither IWG, nor Mr. Brooks, have any adverse financial situations that would reasonably impair the ability of IWG to meet all obligations to its Clients. Neither IWG, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. IWG is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

Form ADV Part 2B – Brochure Supplement

for

**Jason M. Brooks, AIF®, CFP®
President and Chief Compliance Officer**

Effective: February 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jason M. Brooks, AIF®, CFP®, (CRD# 4225460) in addition to the information contained in the Indelible Wealth Group, LLC (“IWG” or the “Advisor”) (CRD # 166864) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (970) 532-5842 or by email at jason@indeliblewealth.com.

Additional information about Mr. Brooks is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Jason M. Brooks, AIF®, CFP®, born in 1971, is dedicated to advising Clients of IWG in his role as the President and Chief Compliance Officer. Mr. Brooks earned a Bachelor of Science in Microbiology from Colorado State University in 2000. Additional information regarding Mr. Brooks's employment history is included below.

Employment History:

President and Chief Compliance Officer, Indelible Wealth Group, LLC	01/2013 to Present
Portfolio Manager, Charles Schwab Investment Advisor Inc	01/2012 to 04/2013
Owner, Mountain Hound, LLC	07/2001 to Present
Portfolio Consultant, Charles Schwab & Co Inc.	06/2000 to 04/2013
Portfolio Consultant, Charles Schwab Bank	02/2005 to 12/2011

Accredited Investment Fiduciary ("AIF®")

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company. The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics. Since October 2002, the Accredited Investment Fiduciary® (AIF®) designation has been the mark of commitment to a standard of investment fiduciary excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

CERTIFIED FINANCIAL PLANNER™ ("CFP®")

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and Client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP® Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Brooks. Mr. Brooks has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Brooks. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Brooks.*** However, the Advisor does encourage you to independently view the background of Mr. Brooks on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or Individual CRD# 4225460.

Item 4 – Other Business Activities

Mountain Hound, LLC

Mr. Brooks is also a member of Mountain Hound, LLC, a residential real estate management firm. This activity requires limited time commitments and do not create any conflicts of interest with Mr. Brooks' responsibilities with IWG. Mr. Brooks is compensated and also performs this activity separate and apart from his role with IWG. Clients of IWG do not participate in Mountain Hound, LLC, nor are they solicited services of this entity.

Item 5 – Additional Compensation

Mr. Brooks has additional business activities where compensation is received. These business activities are detailed in Item 4 above.

Item 6 – Supervision

Mr. Brooks serves as the President and Chief Compliance Officer and Chief Compliance Officer of IWG. As such, no other individual of the Advisor supervises Mr. Brooks. Mr. Brooks can be reached at (970) 532-5842.

IWG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of IWG. Further, IWG is subject to regulatory oversight by various agencies. These agencies require registration by IWG and its Supervised Persons. As a registered entity, IWG is subject to examinations by regulators, which may be announced or unannounced. IWG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Lawrence D. Gale
Investment Advisor Representative**

Effective: February 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Lawrence D. Gale (CRD# 1514793) in addition to the information contained in the Indelible Wealth Group, LLC (“IWG” or the “Advisor”, CRD# 166864) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (970) 532-5842 or by email at jason@indeliblewealth.com.

Additional information about Mr. Gale is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1514793.

Item 2 – Educational Background and Business Experience

Lawrence D. Gale, born in 1960, is dedicated to advising Clients of IWG as an Investment Advisor Representative. Mr. Gale earned a BS in Finance from Metro State in 1992. Additional information regarding Mr. Gale's employment history is included below.

Employment History:

Investment Advisor Representative, Indelible Wealth Group, LLC	01/2017 to Present
Portfolio Consultant, Schwab Private Client Investment Advisory Inc.	01/2012 to 02/2016
Manager Portfolio Consulting, Charles Schwab & CO., Inc.	11/2004 to 12/2015
Dual Employee, Charles Schwab Bank	02/2005 to 12/2011

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Gale. Mr. Gale has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Gale. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Gale.*** However, the Advisor does encourage you to independently view the background of Mr. Gale on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 1514793.

Item 4 – Other Business Activities

Mr. Gale is dedicated to the investment advisory activities of IWG's Clients. Mr. Gale does not have any other business activities.

Item 5 – Additional Compensation

Mr. Gale is dedicated to the investment advisory activities of IWG's Clients. Mr. Gale does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Gale serves as an Investment Advisor Representative of IWG and is supervised by Jason Brooks, the Chief Compliance Officer. Jason Brooks can be reached at (970) 532-5842.

IWG has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of IWG. Further, IWG is subject to regulatory oversight by various agencies. These agencies require registration by IWG and its Supervised Persons. As a registered entity, IWG is subject to examinations by regulators, which may be announced or unannounced. IWG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Carshon R. Rodgers
Investment Advisor Representative**

Effective: February 7, 2024

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Carshon R. Rodgers (CRD# 4008290) in addition to the information contained in the Indelible Wealth Group, LLC ("IWG" or the "Advisor", CRD# 166864) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (970) 532-5842 or by email at jason@indeliblewealth.com.

Additional information about Ms. Rodgers is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4008290.

Item 2 – Educational Background and Business Experience

Carshon R. Rodgers, born in 1971, is dedicated to advising Clients of IWG as an Investment Advisor Representative. Ms. Rodgers attended the College of St. Scholastica in 1991. Ms. Rodgers earned a Bachelor of Arts in Economics from St. Cloud State University in 1995. Ms. Rodgers also earned a Masters in Business Administration from Regis University in 2007. Additional information regarding Ms. Rodgers' employment history is included below.

Employment History:

Investment Advisor Representative, Indelible Wealth Group, LLC	11/2017 to Present
Wealth Advisor, Belpointe Asset Management	06/2017 to 12/2017
Financial Advisor, LPL Financial LLC	07/2011 to 06/2017
Financial Advisor, Met Life	02/2011 to 04/2011
Financial Advisor, Valic Financial Advisors	08/2010 to 01/2011

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Ms. Rodgers. Ms. Rodgers has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Rodgers. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Ms. Rodgers.*** However, the Advisor does encourage you to independently view the background of Ms. Rodgers on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with her full name or her Individual CRD# 4008290.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Ms. Rodgers is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Ms. Rodgers' role with IWG. As an insurance professional, Ms. Rodgers will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Ms. Rodgers is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Rodgers or the Advisor.

Stryde Solutions LLC

Ms. Rodgers serves as an Agent for Stryde Solutions LLC, assisting business owners with cost reduction solutions through the utilization of tax incentives and other areas to reduce expenses. Ms. Rodgers is compensated based on the percentage of cost reductions implemented for the business. Clients are not obligated to engage Ms. Rodgers in this activity. This activity takes up less than 10% of her total time.

Archimedes Offspring Management

Ms. Rodgers serves as a Contractor for Archimedes Offspring Management, assisting the management board with checks and balances with regards to investments into inventions. Ms. Rodgers is compensated on the amount of time and her expertise, where compensation and time may amount to more than 10%.

Item 5 – Additional Compensation

Ms. Rodgers has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Ms. Rodgers serves as an Investment Advisor Representative of IWG and is supervised by Jason Brooks, the Chief Compliance Officer. Mr. Brooks can be reached at (970) 532-5842.

IWG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of IWG. Further, IWG is subject to regulatory oversight by various agencies. These agencies require registration by IWG and its Supervised Persons. As a registered entity, IWG is subject to examinations by regulators, which may be announced or unannounced. IWG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**John J. Gutierrez, AAMS®
Investment Advisor Representative**

Effective: February 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John J. Gutierrez, AAMS®, (CRD# 3050071) in addition to the information contained in the Indelible Wealth Group, LLC (“IWG” or the “Advisor”, CRD# 166864) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (970) 532-5842 or by email at jason@indeliblewealth.com.

Additional information about Mr. Gutierrez is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 3050071.

Indelible Wealth Group, LLC
208 1st St * Berthoud, CO 80513
Phone: (970) 532-5842 * Fax: (970) 532-5424
www.indeliblewealth.com

Item 2 – Educational Background and Business Experience

John J. Gutierrez, AAMS®, born in 1970, is dedicated to advising Clients of IWG as an Investment Advisor Representative. Mr. Gutierrez earned a Business Management degree from Metropolitan State University in 1995. Additional information regarding Mr. Gutierrez's employment history is included below.

Employment History:

Investment Advisor Representative, Indelible Wealth Group, LLC	08/2019 to Present
Private Client Advisor, Schwab Private Client Investment Advisory Inc.	09/2009 to 08/2019
Financial Consultant, Charles Schwab & Co Inc.	07/2005 to 09/2009

Accredited Asset Management SpecialistSM or AAMS®

Individuals who hold the AAMS® designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Gutierrez. Mr. Gutierrez has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Gutierrez.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Gutierrez.***

However, the Advisor does encourage you to independently view the background of Mr. Gutierrez on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 3050071.

Item 4 – Other Business Activities

Mr. Gutierrez is dedicated to the investment advisory activities of IWG's Clients. Mr. Gutierrez does not have any other business activities.

Item 5 – Additional Compensation

Mr. Gutierrez is dedicated to the investment advisory activities of IWG's Clients. Mr. Gutierrez does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Gutierrez serves as an Investment Advisor Representative of IWG and is supervised by Jason Brooks, the Chief Compliance Officer. Mr. Brooks can be reached at (970) 532-5842.

IWG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of IWG. Further, IWG is subject to regulatory oversight by various agencies. These agencies require registration by IWG and its Supervised Persons. As a registered entity, IWG is subject to examinations by regulators, which may be announced or unannounced. IWG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Form ADV Part 2B – Brochure Supplement

for

**Steven R. Wiggins
Investment Advisor Representative**

Effective: February 7, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Steven R. Wiggins (CRD# 4220008) in addition to the information contained in the Indelible Wealth Group, LLC (“IWG” or the “Advisor”, CRD# 166864) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the IWG Disclosure Brochure or this Brochure Supplement, please contact us at (970) 532-5842 or by email at jason@indeliblewealth.com.

Additional information about Mr. Wiggins is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4220008.

Indelible Wealth Group, LLC
208 1st St * Berthoud, CO 80513
Phone: (970) 532-5842 * Fax: (970) 532-5424
www.indeliblewealth.com

Item 2 – Educational Background and Business Experience

Steven R. Wiggins, born in 1975, is dedicated to advising Clients of IWG as an Investment Advisor Representative. Mr. Wiggins earned a degree in Computer Information Systems from University of Wisconsin - Superior in 1999. Additional information regarding Mr. Wiggins's employment history is included below.

Employment History:

Investment Advisor Representative, Indelible Wealth Group, LLC	04/2023 to Present
Care Coordinator, Skills 4 Life	08/2022 to Present
Unemployed, Unemployed	04/2021 to 08/2022
Manager, Lemay Liquors	04/2013 to 04/2021
Director Equity Trading, Wells Fargo Securities	04/2000 to 08/2012

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Wiggins. Mr. Wiggins has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Wiggins.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Wiggins.***

However, we do encourage you to independently view the background of Mr. Wiggins on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4220008.

Item 4 – Other Business Activities

Skills 4 Life

Mr. Wiggins also has a position as a Care Coordinator at Skills 4 Life. Mr. Wiggins in his role as a Care Coordinator assists with administrative duties relating to pediatric Speech, occupational therapy and physical therapy. Mr. Wiggins is compensated for his role as a Care Coordinator. Mr. Wiggins spends approximately 40% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Wiggins has additional business activities that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Wiggins serves as an Investment Advisor Representative of IWG and is supervised by Jason Brooks, the Chief Compliance Officer. Mr. Brooks can be reached at (970) 532-5842.

IWG has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of IWG. Further, IWG is subject to regulatory oversight by various agencies. These agencies require registration by IWG and its Supervised Persons. As a registered entity, IWG is subject to examinations by regulators, which may be announced or unannounced. IWG is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: February 7, 2024

Our Commitment to You

Indelible Wealth Group, LLC ("IWG" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. IWG (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

IWG does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes IWG does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where IWG or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients IWG does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting the Advisor at (970) 532-5842 or via email at jason@indeliblewealth.com.