

Part 2A and 2B of Form ADV: Firm *Brochure*

Item 1: Cover Page

**Iron Horse Wealth Management, LLC
8711 Windsor Parkway, Suite 4
Johnston, Iowa 50131
Telephone: 515-779-6250**

Website: www.ironhorsewm.com

IARD/CRD Number: 165164

March 7, 2024

This brochure provides information about the qualifications and business practices of Iron Horse Wealth Management, LLC. If you have any questions about the contents of this brochure, please contact us at 515-779-6250 or dmarkway@ironhorsewm.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.

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

Additional information about Iron Horse Wealth Management, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Summary of Material Changes

There have been material changes since the February 15, 2023, Form ADV filing on the IARD system as follows:

Effective September 5, 2023, custodial services for Iron Horse at TD Ameritrade transitioned to Charles Schwab & Co., Inc. As a result, there are certain material changes that clients should be aware of:

- Charles Schwab & Co., Inc. will be the new custodian for those client assets previously held at TD Ameritrade.
- For most advisory relationships, the fee schedules will remain the same, however, there may be changes to certain fees and charges associated with the Charles Schwab & Co., Inc. custodial services.

Iron Horse believes that this transition to Charles Schwab & Co., Inc. will benefit its clients by providing enhanced technology and improved operational support. As a result of the transition, Iron Horse has updated Items 5, 12 and 14 of this brochure.

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ITEM 4 Advisory Business

Iron Horse Wealth Management, LLC ("Iron Horse"), established in 2012, provides investment management services on a fee-only basis. Iron Horse's managing member, Dennis Markway, has been active in the industry since 1995. Iron Horse offers financial planning and personalized investment management services to individuals, retirement and profit-sharing plans, trusts, estates, charitable organizations, and corporations. Iron Horse Wealth is a fiduciary and is required to act in a client's best interest at all times.

Financial planning and investment management services are tailored to meet the needs of each client based upon the client's financial goals, investible assets, tax situation, existing holdings, and preferences. Clients may impose restrictions on investing in certain types of securities as appropriate for their situation.

Financial Planning

Financial planning services include preparing a plan that includes: cash flow management, education planning, retirement planning, investment planning, risk management and insurance planning, tax planning, estate planning and business succession planning (for business owners).

Investment Management

The investment management services involve creating an investment portfolio that is tailored to meet the needs and investment/risk objectives of the client. Subject to any written guidelines, which the client may provide, Iron Horse is granted full discretion and authority to manage the account. Accordingly, Iron Horse is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold, as well as the amount of securities to be purchased/sold. Once the portfolio is constructed, Iron Horse provides continuous supervision and rebalances the portfolio as changes in market conditions and client circumstances may require. It is the client's responsibility to notify Iron Horse of any change in financial status or personal data as it occurs.

The Adviser uses a third-party platform to facilitate management of held away assets, which are primarily 401(k) accounts, HSAs, and other assets. The platform allows Adviser to avoid being considered to have custody of client funds since Adviser does not have direct access to client log-in credentials. Adviser is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once client account(s) is connected to the platform, Adviser regularly reviews the available investment options in these accounts, monitor them, and rebalance and implement Adviser's strategies.

Consulting Services

Iron Horse offers consulting related services that may include, but are not limited to, portfolio reviews, investment analysis, and/or asset allocation modeling. Fees associated with such services are based on Iron Horse's hourly rate of \$125. Iron Horse

may also perform the contracted services for an agreed upon fixed fee or retainer basis, which is based on an estimate of the number of hours required to complete the contracted services. Under no circumstances will Iron Horse require prepayment of a fee more than six months in advance and in excess of \$1,200.

Types of Investments

Iron Horse typically provides investment advice on mutual fund shares, insurance products (including variable annuities and life insurance) and ETFs (exchange-traded funds). Iron Horse may also provide investment advice on exchange-listed securities, securities traded over-the-counter, foreign issues, certificates of deposit, securities option contracts, REITs (real estate investment trusts), oil and gas interests, and any type of investment held in a client's portfolio at the inception of the advisory relationship. This may not be an all-inclusive list.

General Information

All Asset Management Services may be provided on a discretionary or nondiscretionary basis by Iron Horse. Discretion means the trading activity within the Client's account(s) may be entered by Iron Horse without receiving prior authorization for each trade. This discretion is authorized by the Client in writing (upon signing the specific Investment Management Agreement) and may be revoked at any time by submitting a written request to Iron Horse. Iron Horse has \$279,802,956 as discretionary assets under management and \$146,487,192 as nondiscretionary assets under management for a total of \$426,290,148 of assets under management as of December 31, 2023. Assets are managed on a discretionary basis unless the client prefers otherwise and Iron Horse agrees on a non-discretionary arrangement. The Client will receive confirmations and statements showing all trading activity in the account(s).

Iron Horse does not participate in a wrap program.

ITEM 5 Fees and Compensation

Financial Planning and Consulting Services

Iron Horse will charge a flat hourly rate of \$125 per hour for financial planning and consulting services. Under no circumstances will Iron Horse require prepayment of a fee more than six months in advance and in excess of \$1,200.

Investment Management Services

On an annualized basis, Iron Horse's current fees for portfolio management services will not exceed 1.50% of the assets under management. All fees are negotiable and there are no account minimums.

Payment of Fees and Brokerage Costs

Clients' assets are held with a qualified custodian that maintains those funds and securities in a separate account for each client under that client's name. The fee for portfolio management services is billed quarterly in arrears based on the market value of the assets on the last day of the quarter unless the client makes withdrawals from or

additions to their account in which case the fee will be billed based on the market value of the assets on the last day of the quarter plus the total amount of client withdrawals/additions occurring in that quarter prorated to the day such transaction takes place. Iron Horse will either invoice the client directly for the advisory fees or the qualified custodian holding the clients' funds and securities will debit the client account directly for the advisory fees, the client may choose which method, although Iron Horse prefers to directly debit the fee from the account. Where the client account is debited directly for the advisory fee, the client will provide written authorization permitting the fees to be paid directly from their account held by the qualified custodian. Iron Horse will not have access to client funds for payment of fees without client consent that was provided to the custodian in writing. Further, the qualified custodian agrees to deliver a quarterly account statement directly to the client. The client is encouraged to review their account statements for accuracy. Iron Horse will receive a duplicate copy of the statement that was delivered to the client. You may contact the custodians used by Iron Horse at either: Charles Schwab & Co., 2723 E Lincoln Drive, Phoenix, AZ 85016 or call 877-716-0852; Fidelity at 800-544-6666, National Financial Services, LLC at 800-800-6890; or Vanguard Marketing Corporation at 610-669-1000.

As fees are payable in arrears, typically, there will be no reason for Iron Horse to provide a refund. The client, however, will be responsible for any outstanding balance due to Iron Horse for services rendered. Some clients have chosen to pay quarterly in advance and if necessary, a refund would be prorated from the date of termination to the quarter end.

Advice offered by Iron Horse may involve investment in mutual funds. Clients are hereby advised that all fees paid to Iron Horse for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities. Iron Horse does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. (See Brokerage Practices) The client should review all fees charged by mutual funds, Iron Horse, and others, so that the total amount of fees to be paid by the client are fully understood. Clients have the option to purchase investment products that Iron Horse recommends through other brokers or agents that are not affiliated with Iron Horse.

In the event of trading errors caused by Iron Horse employees, it is Iron Horse's policy to make its clients whole and to document errors in its trade error file. Any of Iron Horse's created trade errors that result in a gain to a client, and the gain can be attributed to a client, the client is entitled to keep the gain. If Iron Horse makes a trade error that results in a gain to a client and the gain cannot be attributable to a particular client, the custodian, and not Iron Horse, keeps the gain. In that case, if the gain is more than \$100, the custodian will donate the gain to charity. If the gain is less than \$100, the custodian will keep the gain to offset its administrative time and expense.

ITEM 6 Performance-Based Fees and Side-By-Side Management

No Iron Horse employee receives Performance-Based fees.

ITEM 7 Types of Clients

Iron Horse manages individuals, retirement and profit sharing plans, corporations, trusts, and estates. There is not a required minimum account size.

ITEM 8 Methods of Analysis, Investment Strategies, and Risk of Loss

Iron Horse typically uses fundamental and technical analysis to assist with investment decisions. The main sources are websites, financial newspapers and magazines, research material prepared by others, and annual reports, prospectuses, and SEC filings. The investment strategies used to implement advice include long and short-term purchases, margin transactions, and option writing, including covered options, uncovered options or spreading strategies.

Additionally, Iron Horse may use historical quantitative data on selected assets to determine probable risk/reward factors based on the client objectives and constraints. Iron Horse may create a computerized portfolio model to assist in asset selection and performance analysis of varying relationships between asset classes.

Iron Horse has also established a three-member Investment Committee to review, assess and make recommendations for the core model portfolio level decisions. The Investment Committee plans to meet monthly. Investment Adviser Representatives will be making on account level decisions and perform all trading activity.

Iron Horse shall never have custody of any client funds or securities, as the services of a qualified and independent custodian will be utilized for these asset management services. Iron Horse does not represent, warranty, or imply that the services or methods of analysis employed by Iron Horse can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Investing in securities involves a risk of loss that clients should be prepared to bear.

Each client should review the mutual fund prospectus for the specific risks related to each fund that is held in the client's account.

ITEM 9 Disciplinary Information

There are no legal or disciplinary events that are related to Iron Horse's business or the integrity of Iron Horse's management.

ITEM 10 Other Financial Industry Activities and Affiliations

Individuals associated with Iron Horse will provide its investment advisory services. These individuals are appropriately licensed, qualified, and authorized to provide advisory services on behalf of Iron Horse. Such individuals are known as Investment Adviser Representatives.

No Iron Horse employee has a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser. Iron Horse does not have a pending application to register as a broker-dealer, a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

Iron Horse has arrangements that are material to its advisory business with non-related parties. Although these arrangements are considered material to its business they are not considered “related persons.”

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

Iron Horse has adopted a Code of Ethics, the full text of which is available to clients upon request. Iron Horse has several goals in adopting this Code. First, Iron Horse desires to comply with all applicable laws and regulations governing its practice, and the management of Iron Horse has determined to set forth guidelines for professional standards, under which all associated persons of Iron Horse are to conduct themselves. Iron Horse has set high standards, the intention of which is to protect client interests at all times and to demonstrate its commitment to its fiduciary duties of honesty, good faith and fair dealing with Clients. All associated persons are expected to adhere strictly to these guidelines, as well as the procedures for approval and reporting established in the Code of Ethics primarily related to personal securities transactions, and violations of the Code. In addition, Iron Horse maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Iron Horse or any person associated with Iron Horse. Please contact Iron Horse's Chief Compliance Officer at 515-779-6250 to obtain a complete copy of Iron Horse's Code of Ethics.

ITEM 12 Brokerage Practices

Iron Horse primarily recommends that clients establish brokerage accounts with Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC or another qualified custodian (together “the Custodian”). The Custodian is an independent and unaffiliated SEC-registered broker-dealer. The Custodian offers to independent investment advisers services, which include custody of securities, trade execution, clearance and settlement of transactions. Iron Horse receives some benefits from the Custodian through its participation in the program. (Please see the disclosure under Item 14). The Custodian, Iron Horse, and/or Investment Adviser Representatives may receive benefits such as assistance with conferences and educational meetings from product sponsors.

Iron Horse believes that the Custodian provides the best services at the most reasonable commission rates possible. The reasonableness of commissions is based on several factors, including the broker's ability to provide professional services, competitive commission rates, volume discounts, execution price negotiations, the broker's

reputation, experience and financial stability of the broker or dealer, and the quality of service rendered by the broker or dealer in other transactions.

Best execution is not measured solely by reference to commission rates. Paying a broker a higher commission rate than another broker might charge is permissible if the difference in cost is reasonably justified by the quality of the brokerage services offered.

Certain no-load mutual funds may impose a transaction fee with respect to purchases made through a broker/dealer like the Custodian that clients would not have to pay if they dealt directly with that no-load fund. However, the advantages of a consolidated account with centralized bookkeeping and reporting, direct access to funds with a single telephone call, as well as less expensive commission rates on individual stocks and bonds than those available through a full-service broker far outweigh the small transaction fees. It may be the case that the recommended broker charges a higher fee for a particular type of service, such as commission rates. Clients that elect the services of broker/dealers other than those recommended may be subject to additional service fees imposed by Iron Horse at its discretion and also may not be able to participate in aggregate trading practices.

Clients primarily grant Iron Horse discretionary authority over the selection of and amounts of securities to be bought and/or sold for their account without obtaining their prior consent or approval from the client. (See Advisory Business) The trading authority will allow Iron Horse to take advantage of time-sensitive market conditions in securities, which are consistent with the client's prior stated investment objectives. However, Iron Horse's investment authority may be subject to specified investment objectives, guidelines, and/or conditions imposed by the client. For example, a client may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry. Iron Horse does not participate in initial public offerings.

Iron Horse may recommend that certain clients utilize the active non-discretionary management of a portion of their assets by or among certain independent investment managers either directly or through programs sponsored by CLS Investments through Charles Schwab and/or FTJ Fundchoice through Huntington National Bank. Iron Horse will continue to render advisory services to the client relative to the ongoing monitoring and account performance.

Brokerage for Client Referrals

Typically, clients are referred to Schwab and Iron Horse does not receive referrals from Schwab.

Directed Brokerage

A client may direct Iron Horse to use a specific broker; however, the broker may not wish to establish a new relationship with Iron Horse.

Iron Horse participates in the Custodian institutional customer program and Iron Horse may recommend the Custodian to Clients for custody and brokerage services. There is no direct link between Iron Horse's participation in the program and the investment advice it gives to its clients, although Iron Horse receives economic benefits through its participation in the program that are typically not available to the Custodian retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving adviser participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Iron Horse by third party vendors. The Custodian may also have paid for business consulting and professional services received by Iron Horse's related persons. Some of the products and services made available by the Custodian through the program may benefit Iron Horse but may not directly benefit its client accounts. These products or services may assist Iron Horse in managing and administering client accounts, including accounts not maintained at the Custodian.

Other services made available by the Custodian are intended to help Iron Horse manage and further develop its business enterprise. The benefits received by Iron Horse or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to the Custodian. As part of its fiduciary duties to clients, Iron Horse endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Iron Horse or its related persons in and of itself creates a conflict of interest and may influence Iron Horse's choice of the Custodian for custody and brokerage services.

Aggregation of Orders

Iron Horse may aggregate orders with respect to a security if such aggregation is consistent with achieving best execution for the various client accounts. When orders are aggregated, each participating account will receive the average share price for all transactions in a particular security effected to fill such orders on a given business day. Transaction costs will generally be allocated upon each account's participation in the transaction. Specific allocations may be chosen based upon an account's existing positions in securities, the cash availability of one or more particular accounts, a partial fill of the aggregated trade, tax reasons, or the required minimum trade lot sizes for foreign securities.

If it is not possible to aggregate a trade, a client may receive a different price on a security transaction and may not be able to purchase or sell the same quantity of a

security. In addition, clients that elect the services of broker/dealers other than those recommended may not be able to participate in aggregate trading practices.

ITEM 13 Review of Accounts

The review process is, at a minimum, completed quarterly. Iron Horse continuously monitors portfolios and rebalances when appropriate. Investment Adviser Representatives are responsible for completing all client reviews.

The custodian provides quarterly reports that detail portfolio returns on a quarterly and year-to-date basis. Investors are provided with comparable benchmarks to make a fair assessment of the value provided.

ITEM 14 Client Referrals and Other Compensation

Other Compensation

As disclosed under Item 12, above, Iron Horse participates in the Custodian institutional customer program and Iron Horse may recommend the Custodian to Clients for custody and brokerage services. There is no direct link between Iron Horse's participation in the program and the investment advice it gives to its Clients, although Iron Horse receives economic benefits through its participation in the program that are typically not available to the Custodian retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Iron Horse participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Iron Horse by third party vendors. The Custodian may also have paid for business consulting and professional services received by Iron Horse's related persons. Some of the products and services made available by the Custodian through the program may benefit Iron Horse but may not benefit its Client accounts. These products or services may assist Iron Horse in managing and administering Client accounts, including accounts not maintained at the Custodian. Other services made available by the Custodian are intended to help Iron Horse manage and further develop its business enterprise. The benefits received by Iron Horse or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to the Custodian. As part of its fiduciary duties to clients, Iron Horse endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Iron Horse or its related persons in and of itself creates a conflict of interest and may influence the Iron Horse's choice of the Custodian for custody and brokerage services.

Iron Horse may receive access to product research, services, technology and other educational information to help it operate efficiently, grow its business and deliver exceptional service to clients. Custodians or other investment companies may provide some or all of these services. No client is charged for these services and the information received may be used to benefit all clients of Iron Horse.

Iron Horse understands and acknowledges that at all times it owes a fiduciary duty to clients to obtain best execution for their transactions. Iron Horse believes the relationships with these companies help them to execute securities transactions for clients in such a manner that the client's total cost in each transaction is as favorable as possible under prevailing market conditions.

Clients may pay higher account maintenance or trading fees than what is available at other firms.

Client Referrals

Iron Horse does not compensate for client referrals.

ITEM 15 Custody

Iron Horse does **not** have physical custody of any client funds or securities. Client assets are held by qualified custodians. Clients may have standing letters of authorization on their accounts. We have reviewed those relationships and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

Custodian sends account statements directly to clients on at least a quarterly basis. Clients should carefully review these statements, and should compare these statements to any account information provided by us.

ITEM 16 Investment Discretion

Iron Horse primarily manages client accounts on a discretionary basis. When the client signs the Iron Horse Investment Management Agreement, the client authorizes Iron Horse to affect exchanges between the specific investments in accordance with Iron Horse's buy or sell decisions, without Client's prior approval. Clients will also complete the required forms with the custodian to grant this access. Normally, this is part of the custodians account application.

ITEM 17 Voting Client Securities

Iron Horse will not vote proxies on behalf of client accounts. Although Iron Horse may, on rare occasions and only at the client's request, offer clients advice regarding corporate actions and the exercise of proxy voting rights.

ITEM 18 Financial Information

Iron Horse does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Iron Horse does not have any adverse financial information to disclose.

Privacy Notice To Our Clients

We have adopted this policy with recognition that protecting the privacy and security of the personal information we obtain about our customers is an important responsibility. We also know that the customer expects us to service their accounts in an accurate and efficient manner. To do so, we must collect and maintain certain personal information about our customers. We want the customer to know what information we collect and how we use and safeguard that information.

What Information We Collect

We collect certain nonpublic personal identifying information about our customers (such as name, address, social security number, etc.) from information that the customer provides on applications or other forms as well as communications (electronic, telephone, written, or in person) with the customer or authorized representatives (such as attorneys, accountants, etc.). We also collect information about brokerage accounts and transactions (such as purchases, sales, account balances, inquiries, etc.).

What Information We Disclose

We do not disclose the nonpublic personal information we collect about our customers to anyone except: (i) in furtherance of our business relationship and then only to those persons necessary to effect the transactions and provide the services that the customer authorizes (such as broker-dealers, custodians, independent managers, etc.); (ii) persons assessing our compliance with industry standards (e.g. professional licensing authorities, etc.); (iii) our attorneys, accountants, and auditors; or (iv) as otherwise provided by law. We are permitted by law to disclose the nonpublic personal information about our customers to governmental agencies and other third parties in certain circumstances (such as third parties that perform administrative or marketing services on our behalf or for joint marketing programs). These third parties are prohibited to use or share the information for any purpose. If the customer decides at some point to either terminate our services or become an inactive customer, we will continue to adhere to our privacy policy, as may be amended from time to time.

Security of Customer Information

We restrict access to customer nonpublic personal information to those employees who need to know that information to service the accounts. We maintain physical, electronic, and procedural safeguards that comply with applicable federal or state standards to protect customer personal information.

Changes To Our Privacy Policy Or Relationship With The Customer

Our policy about obtaining and disclosing information may change from time to time. We will provide the customer notice of any material change to this policy before we implement the change.

If your personal information with us becomes inaccurate, or if you need to make a change to that information, please contact us at the number shown below so we can update our records.

Item 1: Cover Page

**Dennis L. Markway
Iron Horse Wealth Management, LLC
8711 Windsor Parkway, Suite 4
Johnston, Iowa 50131
Telephone: 515-779-6250**

Website: www.ironhorsewm.com

CRD Number: 4373615

March 7, 2024

This brochure supplement provides information about Dennis L. Markway that supplements the Iron Horse Wealth Management brochure. You should have received a copy of that brochure. Please contact Dennis L. Markway, Chief Compliance Officer, at 515-779-6250 or dmarkway@ironhorsewm.com if you did not receive Iron Horse Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Dennis L. Markway also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience**Dennis L Markway, CFP**

Year of Birth: 1972

Formal Education after High School:

Central College, Pella, Iowa, 1995 BA

University of Northern Iowa, Cedar Falls, Iowa, 1997 MA

Business Background for the Previous Five Years:

Iron Horse Wealth Management, LLC, Johnston, Iowa, Managing Member, 07/2012 to Present

Invest Financial Corporation, Director of Financial Planning, 8/2007 to 07/2012

Mr. Markway earned the Certified Financial Planner (CFP) designation in 2005. In order to achieve and maintain certification, CFP® professionals must: 1) pass the comprehensive CFP® Certification Examination, 2) pass the CFP Board's Fitness Standards for Candidates and Registrants, 3) agree to abide by CFP Board's Code of Ethics and Professional Responsibility and Rules of Conduct which put clients' interests first, 4) comply with the Financial Planning Practice Standards which spell out what clients should be able to reasonably expect from the financial planning engagement, and 5) complete 30 hours of continuing education (including 2 hours of approved Ethics CE) every two years. - See more at: <http://www.cfp.net/become-a-cfp-professional/cfp-certification-requirements#sthash.qwXJz3yF.dpuf>.

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

The above listed supervised person does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

ITEM 5 Additional Compensation

None.

ITEM 6 Supervision

Dennis L. Markway, Chief Compliance Officer, is responsible for monitoring the activities of Iron Horse's supervised persons. Mr. Markway's telephone number is 515-779-6250. Mr. Markway conducts all client contact and continuously reviews investment strategies and market conditions. Iron Horse has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.

Item 1: Cover Page

**Greg J. Hayes
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8711 Windsor Parkway, Suite 4
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Telephone: 515-779-6250**

Website: www.ironhorsewm.com

CRD Number: 6588892

March 7, 2024

This brochure supplement provides information about Greg J. Hayes that supplements the Iron Horse Wealth Management brochure. You should have received a copy of that brochure. Please contact Dennis L. Markway, Chief Compliance Officer, at 515-779-6250 or dmarkway@ironhorsewm.com if you did not receive Iron Horse Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Greg J. Hayes also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Greg J. Hayes, AIF

Year of Birth: 1977

Formal Education after High School:

Loras College, Dubuque, Iowa, 1999, BA Finance

He has passed the Series 65 Examination.

In 12/2017, he obtained his Accredited Investment Fiduciary (AIF) designation from fi360.

The Accredited Investment Fiduciary (AIF) designation represents a thorough knowledge of and ability to apply the fiduciary Practices. Through fi360's AIF Training programs, AIF designees learn the Practices and the legal and best practice framework they are built upon. AIF designees have a reputation in the industry for the ability to implement a prudent process into their own investment practices as well as being able to assist others in implementing proper policies and procedures. AIF Training curriculum is offered in distance education or a blended learning option to suit each student's needs. Each format culminates in the 60 question AIF exam, which students seeking the AIF designation must pass with 75% correct answers. The exam is a 90 minute, closed-book exam, and students may not use any course materials or notes. After passing the exam, students submit designee applications and their first designee fee.

Business Background for the Previous Five Years:

Iron Horse Wealth Management, LLC, Johnston, Iowa, Investment Adviser Representative, 12/2015 to Present

Midwest Heritage Bank, West Des Moines, Iowa, Bank Manager, 10/2011 to 12/2015

Wells Fargo, Des Moines, Iowa, Banker, 09/2003 to 10/2011

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

The above listed supervised person does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

ITEM 5 Additional Compensation

None.

ITEM 6 Supervision

Dennis L. Markway, Chief Compliance Officer, is responsible for monitoring the activities of Iron Horse's supervised persons. Mr. Markway's telephone number is 515-779-6250. Mr. Markway conducts all client contact and continuously reviews investment strategies and market conditions. Iron Horse has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.

Item 1: Cover Page

**Daniel Lee Beyer
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Telephone: 515-779-6250**

Website: www.ironhorsewm.com

CRD Number: 6641102

March 7, 2024

This brochure supplement provides information about Daniel Beyer that supplements the Iron Horse Wealth Management brochure. You should have received a copy of that brochure. Please contact Dennis L. Markway, Chief Compliance Officer, at 515-779-6250 or dmarkway@ironhorsewm.com if you did not receive Iron Horse Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel Beyer also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Daniel Beyer Year of Birth: 1981

Formal Education after High School:

He received a degree in Communication from the Central College in 2004 and received an MBA from Iowa State in 2015. He has passed the Series 65 securities license examination.

Business Background for the Previous Five Years:

Iron Horse Wealth Management, LLC, Johnston, Iowa, Investment Adviser Representative, 5/2018 to Present

Kabel Business Services, West Des Moines, Iowa, Vice President – Sales, 02/2013-05/2018

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

The above listed supervised person does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

ITEM 5 Additional Compensation

None.

ITEM 6 Supervision

Dennis L. Markway, Chief Compliance Officer, is responsible for monitoring the activities of Iron Horse's supervised persons. Mr. Markway's telephone number is 515-779-6250. Mr. Markway conducts all client contact and continuously reviews investment strategies and market conditions. Iron Horse has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.

Item 1: Cover Page

**Mark Alan Broderick
Iron Horse Wealth Management, LLC
8711 Windsor Parkway, Suite 4
Johnston, Iowa 50131
Telephone: 515-779-6250**

Website: www.ironhorsewm.com

CRD Number: 7265945

March 7, 2024

This brochure supplement provides information about Mark Broderick that supplements the Iron Horse Wealth Management brochure. You should have received a copy of that brochure. Please contact Dennis L. Markway, Chief Compliance Officer, at 515-779-6250 or dmarkway@ironhorsewm.com if you did not receive Iron Horse Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Mark Broderick also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience

Mark Broderick Year of Birth: 1998

Formal Education after High School:

He received a degree in Finance, from the Loras College, Dubuque, Iowa in May 2020. He has passed the Series 65 securities license examination, June 2020.

Business Background for the Previous Five Years:

Iron Horse Wealth Management, LLC, Johnston, Iowa, Investment Adviser Representative, 6/2020 to Present

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

The above listed supervised person does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

ITEM 5 Additional Compensation

None.

ITEM 6 Supervision

Dennis L. Markway, Chief Compliance Officer, is responsible for monitoring the activities of Iron Horse's supervised persons. Mr. Markway's telephone number is 515-779-6250. Mr. Markway conducts all client contact and continuously reviews investment strategies and market conditions. Iron Horse has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.

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**Penny Dyan Schmidt
Iron Horse Wealth Management, LLC
8711 Windsor Parkway, Suite 4
Johnston, Iowa 50131
Telephone: 515-779-6250**

Website: www.ironhorsewm.com

CRD Number: 7336547

March 7, 2024

This brochure supplement provides information about Penny Schmidt that supplements the Iron Horse Wealth Management brochure. You should have received a copy of that brochure. Please contact Dennis L. Markway, Chief Compliance Officer, at 515-779-6250 or dmarkway@ironhorsewm.com if you did not receive Iron Horse Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Penny Schmidt also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience**Penny Schmidt**

Year of Birth: 1967

Formal Education after High School:

She received a BBA degree, from the University of Iowa, Iowa City, Iowa in 1990 and a MPA degree from Drake University, Des Moines, Iowa in 2002. She has passed the Series 65 securities license examination, July 2021.

Business Background for the Previous Five Years:

Iron Horse Wealth Management, LLC, Johnston, Iowa, Investment Adviser Representative, 7/2021 to Present

Step Up with Penny LLC, Clive, Iowa, Managing Member, Health Coach, 12/2017 to Present

Country Capital Management, Bloomington, Illinois, Financial Representative, 02/2021 – 07/2021

Country Trust Bank, West Des Moines, Iowa, Investment Solutions Representative, 02/2021-07/2021

Country Insurance, West Des Moines, Iowa, Agent, 05/2020 – 07/2021

Premier Designs Jewelry, Clive, Iowa, Jeweler, 09/2002-09/2019

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

The above listed supervised person does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

ITEM 5 Additional Compensation

None.

ITEM 6 Supervision

Dennis L. Markway, Chief Compliance Officer, is responsible for monitoring the activities of Iron Horse's supervised persons. Mr. Markway's telephone number is 515-779-6250. Mr. Markway conducts all client contact and continuously reviews investment strategies and market conditions. Iron Horse has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.

Item 1: Cover Page

**Isabel Olivia Schwabe
Iron Horse Wealth Management, LLC
8711 Windsor Parkway, Suite 4
Johnston, Iowa 50131
Telephone: 515-779-6250**

Website: www.ironhorsewm.com

CRD Number: 6856286

March 7, 2024

This brochure supplement provides information about Isabel Schwabe that supplements the Iron Horse Wealth Management brochure. You should have received a copy of that brochure. Please contact Dennis L. Markway, Chief Compliance Officer, at 515-779-6250 or dmarkway@ironhorsewm.com if you did not receive Iron Horse Wealth Management's brochure or if you have any questions about the contents of this supplement.

Additional information about Isabel Schwabe also is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 Educational Background and Business Experience**Isabel Schwabe**

Year of Birth: 2000

Formal Education after High School:

She is studying towards a degree in Finance from Loras College, Dubuque, Iowa (anticipated graduation in May 2023). She has passed the Series 65 securities license examination, July 2022.

Business Background for the Previous Five Years:

Iron Horse Wealth Management, LLC, Johnston, Iowa, Associate Advisor, 9/2022 to Present

Loras College, Dubuque, Iowa, Full-time education, 05/2019 to Present

Iron Horse Wealth Management, LLC, Johnston, Iowa, Intern, 05/2021 to 08/2022

Hibbett Sports, Dubuque, Iowa, Assistant Manager, 04/2020 to 05/2021

Panorama National Golf Course, Panora, Iowa, Bartender, 04/2020 to 08/2020

Maurices, Carroll, Iowa, Floor Manager, 07/2018 to 05/2019

Northwestern Mutual, Carroll, Iowa, Administrative Assistant, 06/2017 to 07/2018

ITEM 3 Disciplinary Information

There are no legal or disciplinary events that are related to the above listed supervised person.

ITEM 4 Other Business Activities

The above listed supervised person does not have a pending application to register as a registered representative, an associated person of a futures commission merchant, a commodity pool operator, or a commodity trading adviser.

ITEM 5 Additional Compensation

None.

ITEM 6 Supervision

Dennis L. Markway, Chief Compliance Officer, is responsible for monitoring the activities of Iron Horse's supervised persons. Mr. Markway's telephone number is 515-779-6250. Mr. Markway conducts all client contact and continuously reviews investment strategies and market conditions. Iron Horse has an Investment Adviser Supervisory Manual and Code of Ethics that are annually reviewed.