

ITEM 1: COVER PAGE



Big Sky Wealth Advisors, LLC

Physical Address: 812 14th Street N, Great Falls, Montana 59401
Mailing Address: Post Office Box 1626, Great Falls, Montana 59403
Phone: (406) 315-2627

www.BigSkyWealthAdvisors.com

Form ADV Part 2A Firm Brochure
Effective: August 15, 2023

This brochure provides information about the qualifications and business practices of Big Sky Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (406) 315-2627 or by email at info@bigskywealthadvisors.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.

Additional information about our Firm is available on the SEC's website at www.adviserinfo.sec.gov. The site may be searched by a unique identifying number known as a CRD number. Our Firm's CRD number is 321272.

ITEM 2: MATERIAL CHANGES

This version of Big Sky Wealth Advisors, LLC's Disclosure Brochure, dated January 18, 2023. It contains information regarding our qualifications, business practices, nature of the advisory services we provide, as well as a description of potential conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different.

We encourage all current and prospective clients to read this Firm Brochure and reach out to us with any questions. Should you have any additional questions regarding Big Sky Wealth Advisors or the contents of this Firm Brochure, please contact Joshua Horton, Chief Compliance Officer at (406) 315-2627.

Material Changes

- Our Firm moved from registration with the SEC to registration with various States.

Full Brochure Available

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

At any time, you can view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD No. 321272. To request a complete copy of our Disclosure Brochure, contact us by telephone at (406) 315-2627 or by email at info@bigskywealthadvisors.com.

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ITEM 4: ADVISORY BUSINESS

FIRM DESCRIPTION

Big Sky Wealth Advisors, LLC (referred to as “we,” “our,” “us,” “Firm,” “Advisor,” or “Big Sky”) is a Montana limited liability company founded in 2022, based in Great Falls, Montana. Big Sky Wealth Advisors is pending approval as a registered investment advisor with various State Security Authorities. The Firm is wholly owned by Joshua Horton, who also acts as the Firm’s Chief Compliance Officer. Additional information about Mr. Horton’s background may be found in the accompanying Form ADV Part 2B Brochure Supplement.

The purpose of this Disclosure Brochure is to disclose the conflicts of interest associated with the investment transactions, compensation, and any other matters related to investment decisions made by our Firm or its representatives. As a fiduciary, it is our duty to always act in the client’s best interest first, which includes, but is not limited to, a duty of care, loyalty, obedience, and utmost good faith. This is accomplished in part by knowing our client. Our Firm has established a service-oriented advisory practice with open lines of communication for many different types of clients to help meet their financial goals while remaining sensitive to risk tolerance and time horizons. Working with clients to understand their investment objectives while educating them about our process facilitates the kind of working relationship we value.

Big Sky Wealth Advisors provides investment management and financial planning services. We are committed to helping clients build, manage, and preserve their wealth. Our Firm provides services that help clients to achieve their stated financial goals. We will offer an initial complimentary meeting upon our discretion; however, investment advisory services and financial planning services are initiated only after you and Big Sky execute an agreement.

INVESTMENT MANAGEMENT AND SUPERVISION SERVICES

We manage advisory accounts on a discretionary basis. For discretionary accounts, once we have determined a profile and investment plan with a client, we will execute the day-to-day transactions without seeking prior client consent but within the expected investment guidelines. We may accept accounts with certain restrictions, if circumstances warrant. We primarily allocate client assets among cash, individual stocks, bonds, exchange traded funds (“ETFs”), equities, corporate bonds, municipal bonds, U.S. Government Treasuries and cash in accordance with their stated investment objectives. We generally invest Client’s cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client’s cash balances through relatively low-risk and conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to this service.

Portfolios will be designed to meet a particular investment goal, determined to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, portfolios are continuously and regularly monitored, and if necessary, rebalanced based upon the client’s individual needs, stated goals and objectives. During personal discussions with clients, we determine the client’s objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review a client’s prior investment history, as well as family composition and background. Based on client needs, we develop a client’s personal profile and investment plan. We then create and manage the client’s investments based on that policy and plan. It is the client’s obligation to notify us immediately if circumstances have changed with respect to their goals. Once we have determined the types of investments to be included in a client’s portfolio and have allocated the assets, we provide ongoing investment review and management services.

With our discretionary relationship, we will make changes to the portfolio, as we deem appropriate, to meet client financial objectives. We trade these portfolios based on the combination of our market views and client

objectives, using our investment process. We tailor our advisory services to meet the needs of our clients and seek to ensure that your portfolio is managed in a manner consistent with those needs and objectives. Clients have the ability to leave standing instructions with us to refrain from investing in particular industries or invest in limited amounts of securities.

In all cases, clients have a direct and beneficial interest in their securities, rather than an undivided interest in a pool of securities. We do have limited authority to direct the Custodian to deduct our investment advisory fees from your accounts, but only with the appropriate written authorization from clients.

Where appropriate, we provide advice about any type of legacy position held in client portfolios. Typically, these are assets that are ineligible to be custodied at our primary custodian. Clients will engage us to advise on certain investment products that are not maintained at their primary custodian, such as variable life insurance, annuity contracts, and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans).

You are advised and are expected to understand that our past performance is not a guarantee of future results. Certain market and economic risks exist that adversely affect an account's performance. This could result in capital losses in your account.

Prior to providing the client with wealth management services, we require the client to execute an investment management agreement ("IMA"). The IMA outlines the services Big Sky Wealth Advisors will provide and fees the clients will incur for our Investment Management Services.

FINANCIAL PLANNING SERVICES

Through the financial planning process, our team strives to engage our clients in conversations around the client's goals, objectives, priorities, vision, and legacy – both for the near term as well as for future generations. With the unique goals and circumstances of each client in mind, our team will offer financial planning ideas and strategies to address the client's holistic financial picture, including but not limited to, investment planning, tax return review, charitable planning, divorce planning, cash flow and debt analysis and retirement planning. Please see Appendix A of this brochure for a complete list of our financial planning services and descriptions about each. Our team partners with our client's other advisors (CPAs, Enrolled Agents, Estate Attorneys, Insurance Brokers, etc.) to ensure a coordinated effort of all parties toward the client's stated goals. Such services include various reports on specific goals and objectives or general investment and/or planning recommendations, guidance to outside assets, and periodic updates.

Our specific services in preparing your plan may include:

- Review and clarification of your financial goals;
- Assessment of your overall financial position including cash flow, balance sheet, investment strategy, risk management, and estate planning;
- Creation of a unique plan for each goal you have, including personal and business real estate, education, retirement or financial independence, charitable giving, estate planning, business succession, and other personal goals;
- Development of a goal-oriented investment plan, with input from various advisors to our clients around tax suggestions, asset allocation, expenses, risk, and liquidity factors for each goal. This includes IRA and qualified plans, taxable, and trust accounts that require special attention;
- Design of a risk management plan including risk tolerance, risk avoidance, mitigation, and transfer, including liquidity as well as various insurance and possible company benefits; and

- Crafting and implementation of, in conjunction with your estate and/or corporate attorneys as tax adviser, an estate plan to provide for you and/or your heirs in the event of an incapacity or death.

A written evaluation of each client's initial situation or Financial Plan is provided to the client. An annual review will be provided by the Adviser, if indicated by the Client and Adviser per the Agreement. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Assuming all the information requested from the client is provided promptly, financial plans are typically completed within six (6) months of the client executing the financial planning agreement. Once we have created and provided the initial financial plan to the client, we will continue to communicate with the client and periodically evaluate and adjust the financial plan based on the client's needs and goals. We will also provide educational content to the client. The written financial plan will include a recommendation for a course of activity or specific actions for the client to take. The client must determine whether to implement the financial planning recommendations outlined in the financial plan. Should the client elect to act on any of our recommendations, the client is not obligated to utilize Big Sky Wealth Advisors or its related persons to implement the recommendations within the written financial plan to the extent Big Sky Wealth Advisors or its related persons might be able to, such as effecting insurance transactions.

The FPA may be terminated by the Client within five (5) business days of signing the Agreement without penalty or incurring any fees. The FPA may be terminated by any party at any time without penalty upon receipt of written notice. In the event that the FPA is terminated by either party, the Client shall be provided with any work product, including any unfinished portions of the financial plan within five (5) business days of termination.

Prior to providing the client with financial planning services, we require the client to execute a financial planning agreement ("FPA"). The FPA outlines the financial planning services we will provide and the fees the clients will incur for those services. Financial Planning and Investment Management are separate services, executed under separate agreements. Financial Planning Services do not involve Big Sky Wealth Advisors Investment Management Services.

RETIREMENT PLAN SERVICES

For employer-sponsored retirement plans with participant-directed investments, our firm provides its advisory services as an investment adviser as defined under Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA").

When serving as an ERISA 3(21) investment adviser, the Plan Sponsor and Our Firm share fiduciary responsibility. The Plan Sponsor retains ultimate decision-making authority for the investments and may accept or reject the recommendations in accordance with the terms of a separate ERISA 3(21) Plan Sponsor Investment Management Agreement between Our Firm and the Plan Sponsor. Under the 3(21) agreements,

Our Firm provides the following services to the Plan Sponsor:

- Screen investments and make recommendations.
- Monitor the investments and suggests replacement investments when appropriate.
- Provide a quarterly monitoring report.
- Assist the plan sponsor in developing an Investment Policy Statement ("IPS").
- Recommend QDIA alternatives.
- Recommend non-discretionary model portfolios.

We can also be engaged to provide Plan Consulting Services. Plan Consulting Services include financial education to Plan participants, benchmarking the Plan services, education to fiduciary committee members, and monitoring the service provider. The scope of education provided to participants will not constitute "investment advice" within the meaning of ERISA and participant education will relate to general principles for

investing and information about the investment options currently in the Plan. We may also participate in initial enrollment meetings and periodic workshops and enrollment meetings for new participants.

When servicing as in a 3(38) fiduciary capacity, our Firm is granted full trading authority over the Plan and have the responsibility for the selection and monitoring of all investment options offered under the Plan in accordance with the investment policy statement and its underlying investment objectives and strategies for the Plan. Plan participants have the ability to exercise control over the investment selection from the plans line up of investments, and we have no authority or discretion to direct the investment of assets of any participant's account under the Plan.

OTHER SERVICES

Occasionally, Big Sky may educational seminars and workshops to its clients or prospective clients who reside in the state of Montana. These services are free of charge.

WRAP FEE PROGRAMS

Big Sky Wealth Advisors does not offer or sponsor any wrap fee programs.

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions, and affiliated and unaffiliated investment advisers through which the clients of such firms receive investment advisory, execution, clearing and custodial services in a "bundled" form. In exchange for these "bundled" services, the clients pay an all-inclusive (or "wrap") fee determined as a percentage of the assets held in the wrap account.

ASSETS UNDER MANAGEMENT

When calculating regulatory assets under management, an investment adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services. As of January 17, 2023, our firm has \$84,750,106 regulatory assets under management.

ITEM 5: FEES AND COMPENSATION

The following paragraphs detail the fee structure and compensation methodology for services provided by Big Sky. Each client engaging our Firm for services described herein shall be required to enter into a written agreement with Big Sky Wealth Advisors. Each time the Adviser charges an advisory fee, the Adviser will provide an invoice to the client that contains the fee(s), the formula used to calculate the fee(s), the fee calculation itself, the time period covered by the fee(s), and, if applicable, the amount of assets under management the fee is based on and the name of the Custodian(s).

INVESTMENT MANAGEMENT FEES & COMPENSATION

Unless otherwise specified, fees are billed quarterly in arrears based on the daily average balance. The client's first billing cycle will be prorated based on the number of days the client's account was open and how much was funded into the account during their first quarter. The client's last billing cycle will be prorated based on the number of days the client's account was open during the quarter and the Account Value on the day the relationship is terminated.

Clients must provide our Firm written authorization permitting direct payment of advisory fees from their account(s) maintained by an independent custodian. The account custodian sends a statement to the client, at least quarterly, showing all account disbursements, including advisory fees.

Our Firm or the Client may terminate the advisory agreement within five (5) business days of signing the investment management agreement without penalty to the client. After the five-day period, we may voluntarily terminate the engaged advisory services for any reason with thirty (30) days written notice to the Client. Furthermore, after the five-day period, the Client may voluntarily terminate the advisory agreement for any reason with written notice to the Firm. The date of receipt of the written notice will be the effective date of termination. Upon termination of advisory services, we will conduct a fee reconciliation that will determine whether a refund is owed to the client, or if there are outstanding fees due from the client.

Fees for our investment management services are calculated as a percentage of the market value of client assets under our management, including all cash and other assets in the account (the "Account Value"). Big Sky will not charge an ongoing advisory fee for any unmanaged or static assets held in accounts. The investment management fee charged is subject to negotiation with each client based on the size of the account, prospective growth and other factors and may differ from client to client. The specific fee to be assessed will be outlined in the advisory agreement signed by the client.

Assets Under Management	Maximum Annual Advisory Fee Percentage
\$0 - \$250,000.00	1.50%
\$250,000.01 - \$500,000.00	1.30%
\$500,000.01 - \$1,000,000.00	1.10%
\$1,000,000.01 - \$2,500,000.00	0.90%
\$2,500,000.01 - \$5,000,000.00	0.70%
\$5,000,000.01 and above	0.50%

FINANCIAL PLANNING FEES

Fees for financial planning services will vary based on factors including, the complexity of the Client's financial situation, agreed upon deliverables and the level of experience of the Adviser(s), agreed upon deliverables, and whether or not you intend to implement any recommendations through Big Sky. Fees for financial plans are negotiable and billed as one-time fees or hourly fees.

For the one-time initial planning fee, 50% of the financial planning fee is paid in advance at the time of executing our Financial Planning Agreement and the remaining 50% will be paid in arrears upon delivery of the written financial plan. One-time fees range from \$500 to \$25,000 and are based on the formula: [one-time fee = \$(hour) x Estimated hours].

For ongoing financial planning, fees will be charged to client accounts in January of each year. Ongoing financial planning fees will be calculated using the formula: [Total Fixed Ongoing Fee = \$(hour) x Actual Time Spent].

Hourly fees range from \$250 to \$500 per hour. The fee will be based upon the anticipated number of hours it will take to complete the financial plan or project and the level of expertise required to complete the plan. Per the Financial Planning Agreement, clients can opt for an ongoing annual review of their financial plan. Some investment advisers include financial planning as part of their asset management services for no additional fee.

A completed financial plan will be delivered by Big Sky in less than six months from the effective date of the Agreement unless otherwise agreed upon and noted in the Financial Planning Agreement in Exhibit A. If the service provided does not meet the required hourly threshold, the amount due will be reduced according to the service that was completed and any unearned fee will be refunded to the client.

At our discretion, you may pay the financial planning fees by check. Fees can be paid via check directly to our firm from your personal bank account or can be deducted directly from your advisory account with written discretionary permission. We will not require prepayment of more than \$500 in fees per client, six (6) or more months in advance of providing any services.

The client or Big Sky may terminate financial planning agreements at any time, by providing written notice. Termination by the Client within five (5) business days of them signing the Agreement shall occur without penalty or incurring any fees. In the event that the Agreement is cancelled after five (5) days, the financial planning fee will be prorated based on the time the adviser actually spent performing work on the financial plan based upon the agreed upon hourly rate outlined in Exhibit A of the Financial Planning Agreement.

If termination occurs prior to the plan completion, the Adviser will send the Client all work products that have been completed or are in the process of completion within two (2) business days of Client cancellation along with an invoice containing information regarding all earned fees earned by the Adviser.

In the event of termination of ongoing planning services, the client shall be charged a prorated fee for earned services. This fee will be calculated using the following formula:

$$\text{Ongoing Fee/Time Period of Service Provided} = \text{Prorated Amount}$$

RETIREMENT PLAN SERVICES FEES

For Retirement Plan Advisory Services compensation, we charge an advisory fee as negotiated with the Plan Sponsor and as disclosed in the Employer Sponsored Retirement Plans Consulting Agreement ("Plan Sponsor Agreement"). Our maximum advisory fees do not exceed 0.75% annually.

Typically, the billing period for these fees are paid quarterly in arrears. This fee is generally negotiable, but terms and advisory fees are agreed to in advance and acknowledged by the Plan Sponsor through the Plan Sponsor Agreement and/or Plan Provider's account agreement. Fee billing methods vary depending on the Plan Provider.

Either our Firm or the Plan Sponsor may terminate the Agreement upon 30 days written notice to the other party. The Plan Sponsor is responsible to pay for services rendered until the termination of the Agreement.

Flat Advisory Fee Arrangement - We will bill your 401(k) plan, or build in a markup with the service provider, a flat advisory fee which we will collect periodically depending on the service provider. Typically, the periodicity of these transactions is monthly, every 6 weeks, or quarterly. This fee is generally negotiable, but terms and advisory fee is agreed to in advance and acknowledged by the Plan Sponsor through the Plan Sponsor Agreement.

Either party may terminate your management agreement at any time with written notice.

ADMINISTRATIVE SERVICES

Our Firm utilizes a third party and technology platform to support data reconciliation, performance reporting, fee calculation and billing, research, client database maintenance, quarterly performance evaluations, payable reports, web site administration, models, trading platforms, and other functions related to the administrative tasks of managing client accounts. Due to this arrangement, the third-party vendor will have access to client information, but will not serve as an investment advisor to our clients. AFG and this third party are non-affiliated companies. These third-party charges our Firm an annual fee for each account administered by the third party. The annual fee is paid from the portion of the management fee retained by us.

ADDITIONAL FEES AND EXPENSES

In addition to the advisory fees paid to our Firm, clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks, and other financial institutions (collectively "Financial Institutions"). These additional charges include securities, transaction fees, custodial fees, fees charged by the Independent Managers, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Our brokerage practices are described at length in Item 12, below. Neither our Firm nor its supervised persons accept compensation for the sale of securities or other investment products. Further, our Firm does not share in any of these additional fees and expenses outlined above.

OTHER COMPENSATION

Joshua Horton is a licensed insurance agent. In this capacity, he may sell insurance products. Mr. Horton is not licensed and does not sell insurance products, including variable annuities, to any clients residing outside of his home state of Montana. The sale of insurance products within the state of Montana may present a conflict of interest as they give Mr. Horton an incentive to recommend insurance products based on the compensation received rather than on the client's needs. To mitigate this conflict of interest, Mr. Horton, as a fiduciary and does not receive commission for the sale of insurance products. As a fiduciary, Mr. Horton will only recommend insurance transactions when he believes it to be in the client's best interest. Any insurance commissions Mr. Horton receives do not offset advisory fees the client pays Big Sky Wealth Advisors. Clients are under no obligation to purchase insurance products through Mr. Horton.

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

PERFORMANCE BASED COMPENSATION

Big Sky Wealth Advisors does not assess Performance Fees.

Performance-Based Fees ("Performance Fees") are based on a share of the capital gains or capital appreciation of the assets of a client. Our fees are calculated as described in Item 5 above.

SIDE-BY-SIDE MANAGEMENT

Big Sky Wealth Advisors does not provide Side-By-Side Management.

"Side-by-Side Management" refers to a situation in which the same adviser manages accounts that are billed based only on a percentage of assets under management and at the same time manages other accounts for which fees are performance-based.

ITEM 7: CLIENT TYPES AND ACCOUNT REQUIREMENTS

We provide investment advice to individuals, high net worth individuals, charitable organizations, and corporations, limited liability companies and other business types.

Our Firm maintains a \$50,000 minimum in aggregate investable assets. In certain instances, at the discretion of our Firm, this minimum may be waived if we determine your account can be adequately diversified at an amount less than \$50,000. However, because trading costs are typically a fixed and per transaction cost

imposed by the custodian, smaller accounts will incur incrementally higher trading costs expressed as a percentage of the account balance.

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

We take an active approach in managing our client's assets. Each account is rebalanced on either a quarterly, semi-annual, or annual basis. The frequency of rebalancing is based on the account's time horizon, investment objective current economic climate and tax situation.

While there may be some similarities in the portfolios created by Big Sky, we understand that every client has their own unique planning needs. We have the ability and flexibility to create portfolios to help our client achieve their goals.

METHODS OF ANALYSIS

We may utilize the following forms of analysis:

- **Fundamental Analysis:** Fundamental analysis involves analyzing a business' financial statements (usually to analyze the business's assets, liabilities, and earnings), health, and its competitors and markets. When analyzing a stock, futures contract, or currency using fundamental analysis, there are two basic approaches one can use: bottom-up analysis and top-down analysis. The terms are used to distinguish such analysis from other types of investment analysis, such as quantitative and technical. Fundamental analysis is performed on historical and present data, but with the goal of making financial forecasts. There are several possible objectives: (a) to conduct a company stock valuation and predict its probable price evolution; (b) to make a projection on its business performance; (c) to evaluate its management and make internal business decisions; (d) and/or to calculate its credit risk.; and (e) to find out the intrinsic value of the share.

When the objective of the analysis is to determine what stock to buy and at what price, there are two basic methodologies investors rely upon: (a) Fundamental analysis maintains that markets may misprice a security in the short run but that the "correct" price will eventually be reached. Profits can be made by purchasing the mispriced security and then waiting for the market to recognize its "mistake" and reprice the security; and (b) Technical analysis maintains that all information is reflected already in the price of a security. Technical analysts analyze trends and believe that sentiment changes predate and predict trend changes. Investors' emotional responses to price movements lead to recognizable price chart patterns. Technical analysts also analyze historical trends to predict future price movement. Investors can use one or both of these different but complementary methods for stock picking. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

- **Qualitative Analysis:** A securities analysis that uses subjective judgment based on unquantifiable information, such as management expertise, industry cycles, strength of research and development, and labor relations. Qualitative analysis contrasts with quantitative analysis, which focuses on numbers that can be found on reports such as balance sheets. The two techniques, however, will often be used together to examine a company's operations and evaluate its potential as an investment opportunity. Qualitative analysis deals with intangible, inexact concerns that belong to the social and experiential realm rather than the mathematical one. This approach depends on the kind of intelligence that machines (currently) lack, since things like positive associations with a brand, management trustworthiness, customer satisfaction, competitive advantage, and cultural shifts are difficult, arguably impossible, to capture with numerical inputs. A risk in using qualitative analysis is that subjective judgment may prove incorrect.

- **Quantitative Analysis:** The use of models, or algorithms, to evaluate assets for investment. The process usually consists of searching vast databases for patterns, such as correlations among liquid assets or price-movement patterns (trend following or mean reversion). The resulting strategies may involve high-frequency trading. The results of the analysis are taken into consideration in the decision to buy or sell securities and in the management of portfolio characteristics. A risk in using quantitative analysis is that the methods or models used may be based on assumptions that prove to be incorrect.
- **Technical Analysis:** A security analysis methodology for forecasting the direction of prices through the study of past market data, primarily price and volume. A fundamental principle of technical analysis is that a market's price reflects all relevant information, so their analysis looks at the history of a security's trading pattern rather than external drivers such as economic, fundamental and news events.

Therefore, price action tends to repeat itself due to investors collectively tending toward patterned behavior – hence technical analysis focuses on identifiable trends and conditions. Technical analysts also widely use market indicators of many sorts, some of which are mathematical transformations of price, often including up and down volume, advance/decline data and other inputs. These indicators are used to help assess whether an asset is trending, and if it is, the probability of its direction and of continuation. Technicians also look for relationships between price/volume indices and market indicators. Technical analysis employs models and trading rules based on price and volume transformations, such as the relative strength index, moving averages, regressions, inter-market and intra-market price correlations, business cycles, stock market cycles or, classically, through recognition of chart patterns. Technical analysis is widely used among traders and financial professionals and is very often used by active day traders, market makers and pit traders. The risk associated with this type of analysis is that analysts use subjective judgment to decide which pattern(s) a particular instrument reflects at a given time and what the interpretation of that pattern should be.

Big Sky utilizes the following investment strategies to manage client accounts, provided such strategies are appropriate to the client's needs and consistent with the client's investment objectives, risk tolerance, as well as other important factors.

- **Asset Allocation:** The implementation of an investment strategy that attempts to balance risk versus reward by adjusting the percentage of each asset in an investment portfolio according to the investor's risk tolerance, goals, and investment time frame. Asset allocation is based on the principle that different assets perform differently in different market and economic conditions. A fundamental justification for asset allocation is the notion that different asset classes offer returns that are not perfectly correlated, hence diversification reduces the overall risk in terms of the variability of returns for a given level of expected return. Although risk is reduced as long as correlations are not perfect, it is typically forecast (wholly or in part) based on statistical relationships (like correlation and variance) that existed over some past period. Expectations for return are often derived in the same way.
- **Mutual Fund and/or ETF Analysis:** We look at the experience and track record of the manager of the mutual fund or ETF in attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also monitor the funds or ETFs in attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the

stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

There is no guarantee that a particular strategy will meet its investment goals. The investment strategies we use will vary over time depending on various factors. Our Firm may give advice and take action for clients which differs from advice given or the timing or nature of action taken for other clients with different objectives. Our Firm is not obligated to initiate transactions for clients in any security which its principals, affiliates or employees may purchase or sell for their own accounts or for other clients.

Clients should be aware that ETFs and mutual funds have unique characteristics, and their cost structures differ, sometimes significantly.

INVESTMENT STRATEGY

Our financial advice and investment strategy varies with each Client. We will determine the investments chosen based on a comprehensive assessment that includes a determination of an investor's risk tolerance, time horizon, investment goals, financial situation, and any special circumstances. Once this assessment is complete, a portfolio is built with an individualized asset allocation model specifically tailored to meet the Client's objectives. In some circumstances, many of the Client's existing holdings will not be sold and will be held. The following is a list of some asset allocation strategies that Big Sky may use when forming financial advice and investment strategies for clients.

- **Strategic Asset Allocation:** The primary goal of a strategic asset allocation is to create an asset mix that seeks to provide the optimal balance between expected risk and return for a long-term investment horizon. Strategic asset allocation strategies are agnostic to economic environments, i.e., they do not change their allocation postures relative to changing market or economic conditions.
- **Dynamic Asset Allocation:** Dynamic asset allocation is like strategic asset allocation in that portfolios are built by allocating to an asset mix that seeks to provide the optimal balance between expected risk and return for a long-term investment horizon. Like strategic allocation strategies, dynamic strategies largely retain exposure to their original asset classes; however, unlike strategic strategies, dynamic asset allocation portfolios will adjust their postures over time relative to changes in the economic environment.
- **Tactical Asset Allocation:** Tactical asset allocation is a strategy in which an investor takes a more active approach that tries to position a portfolio into those assets, sectors, or individual stocks that show the most potential for perceived gains. While an original asset mix is formulated much like strategic and dynamic portfolio, tactical strategies are often traded more actively and are free to move entirely in and out of their core asset classes.
- **Core-Satellite Asset Allocation:** Core-Satellite allocation strategies generally contain a 'core' strategic element making up the most significant portion of the portfolio, while applying a dynamic or tactical 'satellite' strategy that makes up a smaller part of the portfolio. In this way, core-satellite allocation strategies are a hybrid of the strategic and dynamic/tactical allocation strategies mentioned above.
- **Fixed Income:** Fixed income is a type of investing or budgeting style for which real return rates or periodic income is received at regular intervals and at reasonably predictable levels. Fixed-income investors are typically retired individuals who rely on their investments to provide a regular, stable income stream. This demographic tends to invest heavily in fixed-income investments because of the reliable returns they offer. Fixed-income investors who live on set amounts of periodically paid income face the risk of inflation eroding their spending power. Some examples of fixed-income investments include treasuries, money market instruments, corporate bonds, asset-backed securities, municipal bonds, and international bonds.

The primary risk associated with fixed-income investments is the borrower defaulting on his payment. Other considerations include exchange rate risk for international bonds and interest rate risk for longer dated securities. The most common type of fixed-income security is a bond. Bonds are issued by federal governments, local municipalities, and major corporations. Fixed-income securities are recommended for investors seeking a diverse portfolio; however, the percentage of the portfolio dedicated to fixed income depends on your own personal investment style. There is also an opportunity to diversify the fixed-income component of a portfolio. Riskier fixed-income products, such as junk bonds and longer-dated products, should comprise a lower percentage of your overall portfolio. The interest payment on fixed-income securities is considered regular income and is determined based on the creditworthiness of the borrower and current market rates. In general, bonds and fixed-income securities with longer-dated maturities pay a higher rate, also referred to as the coupon rate, because they are considered riskier. The longer the security is on the market, the more time it has to lose its value and/or default. At the end of the bond term, or at bond maturity, the borrower returns the amount borrowed, also referred to as the principal or par value.

- **Long-Term Purchases:** Big Sky may buy securities for your account and hold them for a relatively long time (more than a year) in anticipation that the security's value will appreciate over a long horizon. The risk of this strategy is that Big Sky could miss out on potential short-term gains that could have been profitable to your account, or it is possible that the security's value may decline sharply before Big Sky decides to sell.

RISK OF LOSS

A client's investment portfolio is affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic conditions, changes in laws and national and international political circumstances.

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. Big Sky will assist Clients in determining an appropriate strategy based on their tolerance for risk.

While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Risks that apply to both fixed income and equity strategies include, but are not limited to, the following:

- **Active Management Risk:** Due to its active management, a portfolio could underperform other portfolios with similar investment objectives and/or strategies.
- **Allocation Risk:** A portfolio may use an asset allocation strategy in pursuit of its investment objective. There is a risk that a portfolio's allocation among asset classes or investments will cause a portfolio to lose value or cause it to underperform other portfolios with a similar investment objective and/or strategy, or that the investments themselves will not produce the returns expected.
- **Cybersecurity Risk.** Cybersecurity risks include both intentional and unintentional events at Big Sky or one of its third-party counterparties or service providers, that may result in a loss or corruption of data, result in the unauthorized release or other misuse of confidential information, and generally compromise our Firm's ability to conduct its business. A cybersecurity breach may also result in a third-party obtaining unauthorized access to our clients' information, including social security numbers, home addresses, account numbers, account balances, and account holdings. Our Firm has established

business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches. However, there are inherent limitations in these plans and systems, including that certain risks may not have been identified, in large part because different or unknown threats may emerge in the future. As such, there is no guarantee that such efforts will succeed, especially because our Firm does not directly control the cybersecurity systems of our third-party service providers. There is also a risk that cybersecurity breaches may not be detected.

- **Interest-Rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic, and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar will be worth more today than a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e., interest rate). This primarily relates to fixed income securities.
- **Business Risk:** This risk is associated with a particular industry or a particular company within an industry.

Liquidity Risk: Liquidity is the ability to convert an investment into cash readily. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

Risk Factors relevant to specific securities utilized include:

- **Equity Securities:** The value of the equity securities is subject to market risk, including changes in economic conditions, growth rates, profits, interest rates and the market's perception of these securities. While offering greater potential for long-term growth, equity securities are more volatile and riskier than some other forms of investment.
- **Exchange Traded Funds ("ETF"):** ETFs are a recently developed type of investment security, representing an interest in a passively managed portfolio of securities often selected to replicate a securities index, such as the S&P 500 Index or the Dow Jones Industrial Average, or to represent exposure to a particular industry or sector. Unlike open-end mutual funds, the shares of ETFs and closed-end investment companies are not purchased and redeemed by investors directly with the fund, but instead are purchased and sold through broker/dealers in transactions on a stock exchange. Because ETF and closed-end fund shares are traded on an exchange, they may trade at a discount from or a premium to the net asset value per share of the underlying portfolio of securities. In addition to bearing the risks related to investments in equity securities, investors in ETFs intended to replicate a securities index bear the risk that the ETF's performance may not correctly replicate the performance of the index. Investors in ETFs, closed-end funds and other investment companies bear a proportionate share of the expenses of those funds, including management fees, custodial and accounting costs, and other expenses. Trading in ETF and closed-end fund shares also entails payment of brokerage commissions and other transaction costs.
- **Mutual Fund Shares:** Some of the risks of investing in mutual fund shares include: (i) the price to invest in mutual fund shares is the fund's per share net asset value (NAV) plus any shareholder fees that the

fund imposes at the time of purchase (such as sales loads), (ii) investors must pay sales charges, annual fees, and other expenses regardless of how the fund performs, and (iii) investors typically cannot ascertain the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.

- **Index Mutual Fund Shares:** Index Mutual Funds are a type of mutual fund or ETFs that seeks to track the returns of a market by index. A market index measures the performance of a mixture of securities representative of a sector of a stock market or of an economy. Index Mutual Funds generally follow a passive, rather than active, investment strategy, aiming to maximize returns over a period of time. However, some risks associated with Index Mutual Funds include: (i) lack of flexibility to react to price fluctuation in the securities within the index compared to a non-index mutual fund; (ii) tracking error when the index fund does not perfectly track its index; and (iii) underperformance of the index due to the fees, expenses, trading costs, and tracking error associated with the index fund.
- **Municipal Bond Risk:** Municipal securities issuers may face local economic or business conditions (including bankruptcy) and litigation, legislation or other political events that could have a significant effect on the ability of the municipality to make payments on the interest or principal of its municipal bonds. In addition, because municipalities issue municipal securities to finance similar types of projects, such as education, healthcare, transportation, infrastructure and utility projects, conditions in those sectors can affect the overall municipal bond market. Furthermore, changes in the financial condition of one municipality may affect the overall municipal bond market. The municipal obligations in which clients invest will be subject to credit risk, market risk, interest rate risk, credit spread risk, selection risk, call and redemption risk and tax risk, and the occurrence of any one of these risks may materially and adversely affect the value of the client's assets or profits.
- **Fixed Income Securities Risk:** Prices of fixed income securities tend to move inversely with changes in interest rates. Typically, a rise in rates will adversely affect fixed income security prices. The longer the effective maturity and duration of the client's portfolio, the more the portfolio's value is likely to react to interest rates. For example, securities with longer maturities sometimes offer higher yields, but are subject to greater price shifts as a result of interest rate changes than debt securities with shorter maturities. Some fixed income securities give the issuer the option to call, or redeem, the securities before their maturity dates. If an issuer calls its security during a time of declining interest rates, we might have to reinvest the proceeds in an investment offering a lower yield, and therefore might not benefit from any increase in value as a result of declining interest rates. During periods of market illiquidity or rising interest rates, prices of callable issues are subject to increased price fluctuation.
- **Interval Mutual Funds:** While interval mutual funds may provide limited liquidity to shareholders by offering to repurchase a limited amount of shares on a periodic basis, there is no guarantee that clients will be able to sell all of their shares in any specific repurchase offer. Also, the offer to repurchase shares may be suspended or postponed by the investment sponsor. An investment in an interval fund involves a considerable amount of risk and it is possible to lose the total investment amount. An investment in a closed-ended interval mutual fund is suitable only for investors who can bear the risks associated with the limited liquidity of the shares and should be viewed as a long-term investment.

While this information provides a synopsis of the events that may affect a client's investments, this listing is not exhaustive. Although our methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Clients are encouraged to ask our Firm any questions regarding their risk tolerance.

Clients should understand that there are inherent risks associated with investing and depending on the risk occurrence; clients may suffer **loss of all or part of the client's principal investment**.

RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES

We do not primarily recommend a particular type of security as our recommendations is unique to each client based on their needs, goals, and risk capacity.

ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that are material to a client's or prospective client's evaluation of the Firm or the integrity of the Firm's management. **Neither the Firm nor any of its management persons have been involved in legal or disciplinary events that are related to past or present investment clients.** Our backgrounds are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching our Firm name or our CRD No. 321272.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

As a registered investment advisor, we are required to disclose when we, or any of our principals, have any other financial industry affiliations.

INSURANCE

Some of our Investment Adviser Representatives ("IARs") of the Firm are licensed Insurance Agents registered with Montana's Insurance Departments. IARs of Big Sky are not licensed and do not sell insurance products, including variable annuities, to any clients residing outside of his home state of Montana. IARs receive compensation as a result effecting insurance transactions for mutual client(s) of Big Sky. Compensation generated by insurance sales do not offset regular advisory fees. Our firm has an incentive to recommend insurance products and this incentive creates a conflict of interest between your interests and our Firm. We mitigate this conflict by disclosing to clients they have the right to decide whether to engage the Insurance services offered through our IARs. Further, clients should note they have the right to decide whether to act on the recommendations and the right to choose any professional to execute the advice for any insurance products through any licensed insurance agent not affiliated with our Firm. We recognize the fiduciary responsibility to place the client's interests first and have established policies in this regard to avoid any conflicts of interest.

OTHER AFFILIATIONS

Our Firm does not have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

Clients should be aware that the ability to receive additional compensation by our Firm and its management persons or employees creates conflicts of interest that impair the objectivity of the Firm and these individuals when making advisory recommendations. Our Firm endeavors at all times to put the interest of its clients first as part of our fiduciary duty as a registered investment adviser; we take the following steps, among others to address this conflict:

- we disclose to clients the existence of all material conflicts of interest, including the potential for the Firm and our employees to earn compensation from advisory clients in addition to the Firm's advisory fees.
- we disclose to clients that they have the right to decide whether to purchase recommended investment products from our employees.
- we collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives, and liquidity needs.

- the Firm conducts regular reviews of each client advisory account to verify that all recommendations made to a client are in the best interest of the client's needs and circumstances.
- we require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed.
- we periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by the Firm; and
- we educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

SELECTION OF OTHER ADVISORS

Our Firm does not recommend or select other investment advisers for our clients, nor do we have any other business relationships with other investment advisers that creates a material conflict of interest.

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

DESCRIPTION OF CODE OF ETHICS

All employees of Big Sky Wealth Advisors must act in an ethical and professional manner. In view of the foregoing and applicable provisions of the Investment Advisers Act of 1940, we have adopted a set of enforceable guidelines ("Code of Ethics"), to identify and prohibit certain types of transactions deemed to create conflicts of interest (or the potential for or the appearance of such conflicts), and to establish reporting requirements and enforcement procedures relating to personal trading by our personnel. The Firm's Code of Ethics specifically deals with professional standards, insider trading, personal trading, gifts and entertainment, and fiduciary duties, establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. The goal of our Code of Ethics is to protect the interests of our clients at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with clients. We will provide a copy of our Code of Ethics to any client or prospective client upon request. If you would like to receive a full copy of our Code of Ethics, please contact us by telephone at (406) 315-2627 or by email at info@bigskywealthadvisors.com.

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

Neither our Firm, nor its representatives, recommend or effect transactions in securities in which any related person may have material financial interest.

PROPRIETARY / SIMULTANEOUS TRADING

Our Firm, or its related persons, may buy or sell securities for its own accounts that it has also recommended to clients. However, any purchase or sale of a security by the Firm or its related person will be subject to the Firm's fiduciary duty to its clients. From time to time, investment advisors of the Firm may buy or sell securities for themselves at or around the same time as the Firm's clients. In any instance where similar securities are bought or sold, the Firm will uphold its fiduciary duty by always transacting on behalf of the client before transacting for its own benefit. The Firm will always document any transactions that could be construed as a conflict of interest.

To mitigate or remedy any conflict of interest or perceived conflict of interest, the Firm will monitor its proprietary and personal trading reports for adherence to its Code of Ethics. All related persons are expected to adhere strictly to these guidelines.

ITEM 12: BROKERAGE PRACTICES

SELECTION AND RECOMMENDATION

Our Firm does not maintain custody of client assets other than its ability to deduct advisory fees and disburse funds pursuant to a standing letter of authorization as described in Item 15 of this Firm Brochure. Client assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that clients use the Schwab Advisor Services division of Charles Schwab & Co. Inc. (“Schwab”), a FINRA-registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and not affiliated with Schwab. Schwab will hold client assets in a brokerage account and buy and sell securities when instructed. While we recommend that clients use Schwab as custodian/broker, clients will decide whether to do so and open an account with Schwab by entering into an account agreement directly with them. Big Sky Wealth Advisors does not open the account. While the account is maintained at Schwab, Big Sky Wealth Advisors can still use other brokers to execute trades, as described in the next paragraph.

We seek to recommend a custodian/broker who will hold client assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. A wide range of factors are considered, including, but not limited to:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody).
- Capability to execute, clear and settle trades (buy and sell securities for client accounts).
- Capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.).
- Breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.).
- Availability of investment research and tools that assist in making investment decisions quality of services.
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them.
- Reputation, financial strength and stability of the provider.
- Prior service to Big Sky Wealth Advisors and its other clients.
- Availability of other products and services that benefit Big Sky Wealth Advisors, as discussed below (see “Products & Services Available from Schwab”); etc.

Schwab generally does not charge a separate fee for custody services but is compensated by charging commissions or other fees to clients on trades that are executed or that settle into the Schwab account. In addition to commissions, Schwab charges a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into a Schwab account. These fees are in addition to the commissions or other compensation paid to the executing broker-dealer. To minimize client trading costs, we have Schwab execute most trades for the accounts.

RESEARCH AND OTHER SOFT DOLLAR BENEFITS

Schwab Advisor Services is Schwab’s business serving independent investment advisory firms like Big Sky Wealth Advisors. They provide us and our clients with access to its institutional brokerage – trading, custody, reporting and related services – many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help manage or administer our client accounts while others help manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we do not have to request them) and at no charge to us. Clients are not required to pay higher

commissions or fees in exchange for these soft dollar benefits. The availability of Schwab's products and services is not based on the provision of particular investment advice, such as purchasing particular securities for clients. Here is a more detailed description of Schwab's support services:

Services that Benefit Clients

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by firm clients. Schwab's services described in this paragraph generally benefit clients and their accounts.

Services that May Not Directly Benefit Clients

Schwab also makes available other products and services that benefit our Firm but may not directly benefit clients or their accounts. These products and services assist in managing and administering our client accounts. They include investment research, both Schwab's and that of third parties. This research may be used to service all or some substantial number of client accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

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

Services that Generally Only Benefit Big Sky Wealth Advisors

Schwab also offers other services intended to help manage and further develop our business enterprise. These services include:

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

Schwab may provide some of these services itself. In other cases, Schwab will arrange for third-party vendors to provide the services to our Firm. Schwab may also discount or waive fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits, such as occasional business entertainment for our personnel. Irrespective of direct or indirect benefits to our clients through Schwab, we strive to enhance the client experience, help clients reach their goals and put client interests before that of Big Sky Wealth Advisors or associated persons.

The availability of these services from Schwab benefits our Firm because we do not have to produce or purchase them. Our Firm does not have to pay for these services, and they are not contingent upon committing any specific amount of business to Schwab in trading commissions or assets in custody. Considering our arrangement with Schwab, a conflict of interest exists as we may have incentive to require that clients maintain their accounts with Schwab based on its interest in receiving Schwab's services that benefit our Firm rather than based on client interest in receiving the best value in custody services and the most favorable execution of transactions. As part of our fiduciary duty to our clients, we will always endeavor to put its client's interests first. Clients should be aware, however, that the receipt of economic benefits by our Firm or our related persons creates a potential conflict of interest and may indirectly influence our choice of Schwab as a custodial recommendation. We examined this potential conflict of interest when it chose to recommend Schwab and has

determined that the recommendation is in our clients' best interest and satisfies our fiduciary obligations, including its duty to seek best execution.

In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. We believe that the selection of Schwab as a custodian and broker is the best interest of its clients. It is primarily supported by the scope, quality, and price of Schwab's services, and not Schwab's services that only benefit our Firm.

BROKERAGE FOR CLIENT REFERRALS

Our Firm does not receive client referrals from third parties for recommending clients utilize a specific broker-dealer's brokerage services.

DIRECTED BROKERAGE

We require clients to open an account with Schwab, member FINRA/SIPC, and do not permit clients to direct brokerage. This arrangement is designed to maximize efficiency and to be cost effect for our clients. By requiring clients utilize this specific custodian, we seek to achieve best execution of client transactions. Please note that not all firms restrict the client's ability to direct brokerage and that by directing brokerage, the Firm may be unable to achieve the most favorable execution of *client* transactions and this practice may cost *clients* more money.

ORDER AGGREGATION

Our Firm may, at times, aggregate sale and purchase orders of securities ("block trading") for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, lower commission expenses, or beneficial timing of transactions, or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. Our Firm may aggregate or "bunch" transactions for a client's account with those of other clients in an effort to obtain the best execution under the circumstances.

TRADE ERROR POLICY

The Firm maintains a record of any trading errors that occur in connection with investment activities of its clients. The Firm will bear any losses due to trading errors. Gains generated as a result from a trade error will either: (i) follow the custodian's policy; (ii) be credited to the client's account; or (iii) be donated to charity. The Firm does not retain any gains associated with trade errors.

ITEM 13: ACCOUNT REVIEWS

PERIODIC REVIEWS

The Firm reviews its clients' account activity with a formal review at least as frequently as coincides with the Adviser's investment strategies for the client's account(s) and no less than annually. For investment management clients, the reviews consist of determining whether a client's investment goals and objectives are aligned with the Firm's investment objectives and risk tolerance, and whether they are appropriately positioned based on market conditions. For financial planning clients, the reviews consist of evaluation of the plan progress and to ensure the plan is in line with the client's investment objectives, goals, and needs. The reviews are overseen by Joshua Horton, Managing Member and Chief Compliance Officer.

INTERMITTENT REVIEWS

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, pandemic, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify Big Sky Wealth Advisors promptly, in writing, if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

REPORTS

Clients may receive written reports regarding confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information from the Firm. Confirmations and statements are prepared and delivered by the custodian. The custodian for the individual client's account will also provide clients with an account statement at least quarterly. You are urged to compare the reports and invoices provided by Big Sky against the account statements you receive directly from your account custodian and promptly notify Big Sky of any discrepancies.

ITEM 14: REFERRALS AND OTHER COMPENSATION

ECONOMIC BENEFITS FROM OTHERS

Our Firm receives economic benefit from Schwab in the form of the support products and services made available to our Firm and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit our Firm, and the related conflicts of interest are described above (*see Item 12 – Brokerage Practices*). The availability of Schwab's products and services is not based on our Firm giving particular investment advice, such as buying particular securities for our clients.

In addition to the economic benefits mentioned above, Schwab has provided us with financial assistance ("Transition Assistance") to aid in transitioning Mr. Horton's book of business to Schwab's platform. The proceeds made available to us were used to pay for legal, compliance, technology, and other start-up expenses. The receipt of Transition Assistance creates a conflict of interest for us to recommend clients custody their assets with Schwab as opposed to another custodian. We reviewed this conflict when it initially evaluated Schwab's services and, while we believe Schwab's full-service suite provides a great value to clients in itself, clients should be aware of our conflict of interest and take it into consideration when deciding whether to open an account with Schwab.

COMPENSATION TO UNAFFILIATED THIRD PARTIES

Big Sky does not directly or indirectly compensate any person who is not considered a supervised person for client referrals or any form of recommendation.

ITEM 15: CUSTODY

CUSTODIAN OF ASSETS

Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them. Big Sky Wealth Advisors is deemed to have custody of client assets pursuant to its ability to deduct advisory fees and its ability to disburse client funds to third parties under a standing letter of authorization.

All clients receive account statements directly from their qualified custodian(s) at least quarterly upon account opening. Our Firm urges clients to carefully review these statements.

Third Party Money Movement. While we are deemed to have custody of client assets due to its ability to disburse client funds to a third party under a standing letter of authorization, we are not required to obtain an annual surprise examination from an independent accounting firm because it has adopted the following safeguards in conjunction with its custodian:

- The client provides instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- The client can terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

ACCOUNT STATEMENTS

Although the Firm is the client's adviser, the client's statements will be mailed or made available electronically by the broker-dealer or custodian. Clients should carefully review those statements and are urged to compare the statements against reports received from Big Sky. When you have questions about your account statements, you should contact us, your Adviser, or the qualified custodian preparing the statement.

ITEM 16: INVESTMENT DISCRETION

It is the Firm's customary procedure to have full discretionary authority that allows our firm to transact portfolio securities accounts on behalf of clients. Discretionary authority is granted either by the advisory agreement and/or by a separate limited power of attorney where such document is required.

Other than advisory fees due to the Firm, which the Firm will receive directly from the Custodian, the Firm's discretionary authority does not grant us the authority to take or have possession of any assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to the Firm. Furthermore, the Firm's discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

By granting our Firm investment discretion, our Firm has the authority to determine, without obtaining specific client consent, the securities to be bought or sold and the amount of the securities to be bought or sold in accordance with the client's stated investment objectives.

ITEM 17: VOTING CLIENT SECURITIES

Our Firm cannot vote for Client securities. Clients will receive proxies or other solicitations directly from the Custodian or a transfer agent. Clients are responsible for obtaining and voting proxies for all securities maintained in their portfolios. We may provide advice to you regarding your voting of proxies. Clients can contact our Firm with any questions or concerns about a particular solicitation.

CLASS ACTION LAWSUITS

Chicago Clearing Corporation ("CCC") provides class action litigation monitoring and securities claim filing services for our Clients. Participation in this service requires that we provide private information to CCC to assist with its class action suit research. Taking part in this service is voluntary but highly recommended. If you choose not to participate, you can vote on corporate governance concerns in whatever fashion you see fit.

ITEM 18: FINANCIAL INFORMATION

BALANCE SHEET REQUIREMENT

Our Firm is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$500 per client and six months or more in advance.

FINANCIAL CONDITION

Our Firm does not have any financial impairment that will preclude the Firm from meeting contractual commitments to clients.

BANKRUPTCY PETITION

Our Firm meets all net capital requirements that it is subject to, and the Adviser has not been the subject of a bankruptcy petition in the last 10 years.

ITEM 19: REQUIREMENT FOR STATE REGISTERED ADVISORS

Please see Form ADV Part 2B, Item 2 regarding the formal education and business background of our IARs. Please see Form ADV Part 2B, Item 4 for information regarding the other business activity, along with the time spent of our IARs.

Our IARs have not been involved in or found liable in an arbitration claim or civil, self-regulatory organization or administrative proceeding alleging damages in excess of \$2,500, involving an investment or an investment-related business or activity; fraud, false statement(s), or omissions; theft, embezzlement, or other wrongful taking of property; bribery, forgery, counterfeiting, or extortion; or dishonest, unfair, or unethical practices. No individual from our firm has a relationship with any issuer of securities.

In no case is Big Sky or supervised persons compensated based on, or related to, the performance of Client funds or investments.

Our Firm maintains a written Business Continuity Plan (BCP). The BCP outlines procedures relating to an emergency or significant business disruption. Our procedures are reasonably designed to enable our Firm or any of its investment advisor representatives to meet their existing fiduciary obligations.

If you have any questions, concerns or require additional information before retaining the services of our Firm, you may contact the CCO at (406) 315-2627.

APPENDIX A: FINANCIAL PLANNING SERVICES DESCRIPTIONS

Investment Planning: After reviewing a client's liquid assets, an investment plan formulates an investment allocation, rebalancing plan, trading plan, and deposit/withdrawal plan based on a client's goals, needs, and wants.

Risk Management Analysis: After reviewing a client's insurance products as well as their situation and needs for insurance, a summary is laid out of current insurance coverages and any gaps that may exist where there could be a need for additional insurance.

Cash Flow and Debt Analysis: After reviewing a client's income sources and debts, a flow chart is created outlining a client's needs and goals and how best to utilize incoming cash flows toward savings, investment, or debt repayment. This service also includes a debt repayment analysis with a structure of best practices for paying down debt and potential timelines.

Employee Benefits and Compensation: This service reviews a client's employment income as well as the client's employer benefits package and compares and contrasts those benefits to similar employers and jobs. Next, a summary is Created outlining potential gaps in benefits or dislocations between employee pay and the market standards.

Corporate Tax Planning: After reviewing a client's tax documents, this service aims to find planning opportunities looking forward into future years and possible gaps missed in previous years. A comprehensive checklist is utilized, and in some cases, a 3rd party is brought in to assist in evaluating the tax plan. All plans, once completed, are reviewed with the client and accountant to ensure accuracy and that everyone agrees on the plan moving forward and no further changes are needed.

Corporate Financial Planning: After reviewing corporate balance sheets and finances, this service evaluates whether there are any areas where planning can be done and improvements can be made to improve cash flow, business operations, business valuations, redundancies, risk management, investments, and any other metrics that need to be measured. This service incorporates the corporations needs and goals into the evaluation. This service is often linked with Corporate Tax Planning.

Multi-generational Planning: A Family meeting is utilized to lay out the family's goals, wants, and needs and a plan is created around those and the family's legacy. Balance sheets and net worth statements are created for each individual and the family as a whole. A plan is created for passing assets from one generation to the next. This plan requires a comprehensive financial plan on the family patriarch/matriarch and any business associated with the family.

Lines of Credit Analysis: This service reviews current credit lines, credit and loan options for both businesses as well as individuals, and what their capabilities and potentials are for receiving loans and loan amounts. This service can also involve introduction to banking and loan institutions.

Personal Tax Planning: This service offers a comprehensive review of the client's taxes in conjunction with the use of an extensive checklist looking for gaps in previously reported taxes and opportunities for planning in future years to potentially reduce the client's tax burden. A meeting with the client and the client's accountant follows the tax review to verify information and make certain that nothing is overlooked in the planning.

Personal Financial Planning: This service reviews the client's goals, wants, and needs while evaluating, income, budget, expenses, debt, net worth, investments, insurance, and other non-liquid assets. In addition, retirement timelines, education funding timelines, and other goal timelines are created to prepare the client for financial readiness in the future.

Corporate Structure: This service offers an evaluation of the corporate structure- looking closely at how a business is set up and its taxes and income. We then evaluate ways to improve the current corporate structure and streamline processes and oversight. If other options are available for restructuring the corporation both in its physical structure and in its tax filing structure, this service also offers recommendations.

Education Planning: This service is utilized by clients seeking to create a plan for education funding goals and timelines. needed to achieve goals in funding education for clients and those they wish to support. Analysis is based on projected cost of education and calculation of what is needed in the client's current circumstances to achieve their goals.

Business Planning: Evaluation of business and ownership situation on the financial front with comprehensive business valuation, succession planning, exit strategies, and strategies to improve the value of the business based on the client's goals and needs.

Retirement Planning: Retirement timeline is created based on current client situation, income, and net worth, along with their retirement goals and needs. Spending evaluation is done and investment/asset evaluation to determine what the client needs to have in retirement in order to live the life they are striving to live. If there are gaps, plans are formulated to fill or fix those gaps.

Tax Return Review: Basic Tax Return review. Completed on an annual basis after Tax Planning with the client has been completed to make certain the tax planning is staying on track.

Wealth Accumulation and Preservation Strategies: Reviews ways in which a client can increase and keep their wealth both through the utilization of investments as well as advice on other forms of assets not managed directly through Big Sky Wealth Advisors.

Estate Planning: Reviewing or helping to layout initial checklist for creation of estate planning documents including wills, trusts, powers of attorney, health care directives, and other estate planning documents. A checklist is utilized by the client to layout their last wishes and details around their burial services as well as creating a list of personal items that might be overlooked and dictating which family members the items go to.

Charitable Planning: Evaluation of the different charitable giving options and plans available to a client based on their situation and which type of giving is best suited to them and their needs. Along with this is a timeline and schedule of gifting that the client can utilize to keep track of their charitable giving.

Divorce Planning: Reviewing client assets and net worth along with spouse's assets and net worth and strategizing with the client on their goals, needs, and wants from the divorce and the best way to lay out the plan. This is often done in tandem with the divorce attorney, so everyone is on the same page and agrees to the plan. Gives the client a working basis of information and clear picture of what they want along with the best way to articulate that in the proceedings.

PRIVACY POLICY NOTICE

FACTS	WHAT DOES BIG SKY WEALTH ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?
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Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
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What?	<p>The types of personal information we collect, and share depends on the product or service you have with us. This information can include, but is not limited to:</p> <ul style="list-style-type: none">• Social Security number and income.• Assets and transaction history; and• Investment experience and risk tolerance. <p>When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p>
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How?	All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons Big Sky Wealth Advisors, LLC chooses to share and whether you can limit this sharing.
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Reasons we can share your personal information	Does Big Sky Wealth Advisors, LLC?	Can you limit this sharing?
For our everyday business purposes —such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	NO
For our marketing purposes—to offer our products and services to you	NO	We do not share
For joint marketing with other financial companies	NO	We do not share
For our affiliates' everyday business purposes—information about your transactions and experiences	NO	We do not share
For our affiliates' everyday business purposes—information about your creditworthiness	NO	We do not share
For our affiliates to market to you	NO	We do not share
For non-affiliates to market to you	NO	We do not share

To limit our sharing	<p>Please note:</p> <p>If you are a new client, we can begin sharing your information from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice.</p>
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Questions?	Call: (406) 315-2627
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Who we are	
Who is providing this notice?	Big Sky Wealth Advisors, LLC

What we do	
How does Big Sky Wealth Advisors, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we restrict access to your nonpublic personal information to those employees who need to know that information to service your account. We also maintain physical, electronic and procedural safeguards that comply with applicable federal or state standards to protect your nonpublic personal information.
How does Big Sky Wealth Advisors, LLC collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> ■ open an account or give us contact information. ■ enter into an investment adviser contract or give us your income information. ■ tell us about your investment or retirement portfolio. <p>We also collect your personal information from other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only.</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you. ■ sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ NONE
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ NONE
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ NONE

Other Important Information
By signing Big Sky Wealth Advisors, LLC Agreement, I acknowledge that I have fully read and understand this Privacy Policy and opt-in as outlined above. I understand that if I have any questions or concerns about this policy, it is my responsibility to discuss this with my financial professional.

PART 2B BROCHURE

ITEM 1 – COVER PAGE



Joshua T. Horton

Big Sky Wealth Advisors, LLC
812 14th Street North
Great Falls, MT 59401
Phone: (406) 315-2627

August 15, 2023

Part 2B Brochure

This brochure supplement provides information about Big Sky Wealth Advisors, LLC ("Big Sky") that supplements our brochure. You should have received a copy of that brochure. Please contact us at (406) 315-2627 or josh@bigskywealthadvisors.com if you did not receive Big Sky Wealth Advisors, LLC brochure or if you have any questions about the contents of this supplement. Additional information about Josh Horton is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 6187019.

ITEM 2 – EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

Joshua T. Horton

Year of Birth: 1986

Educational Background:

- 2008: Seattle University; Bachelor of Arts in Psychology
- Insurance License: Life, Health & Long-Term Disability

Business Background:

- *Big Sky Wealth Advisors, LLC*, Managing Member & CCO, 09/2022 - Present
- Silver Oak Securities, Inc., Registered Representative, 10/2022 – 06/2023
- *Stifel, Nicolaus, & Company, Inc.*, First Vice President - Investments, 04/2013 – 09/2022

ITEM 3 – DISCIPLINARY INFORMATION

Josh Horton has no history of any legal or disciplinary events that deem to be material to a client's consideration of Josh Horton to act as their investment adviser representative. FINRA's BrokerCheck® is a resource available to review the disciplinary history of Josh Horton. <https://brokercheck.finra.org/>

ITEM 4 – OTHER BUSINESS ACTIVITIES

Josh Horton holds an insurance license to sell insurance products and offers them through DPL Financial Partners. It is anticipated that a small portion, less than (5%) of his time, will be spent providing these insurance products. He will receive compensation from selling insurance products and therefore receive economic benefit for this activity. This activity may create a conflict of interests with clients. The client is under no obligation to purchase insurance through Josh Horton. To address this, disclosure is made to the client at the time purchase is made, identifying the nature of the transaction or relationship, the role to be played and any compensation to be paid by the client and/or received by the insurance agent. Clients have the right to decide whether to act on the recommendation and the right to purchase any insurance products through the insurance agent of their choice. The Firm and its Investment Adviser Representative will always act in the best interest of the client.

Mr. Horton will only engage in the sale of insurance products with clients who reside in his home state of Montana.

ITEM 5 – ADDITIONAL COMPENSATION

Josh Horton does not receive additional compensation beyond the scope of his role as your investment adviser representative and items listed in Item 4.

ITEM 6 – SUPERVISION

Josh Horton is the Chief Compliance Officer of Big Sky. He supervises and oversees all activities conducted through the firm and maintains policies and procedures to guide his activities. Josh Horton reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation.

Our Firm is also subject to regulatory oversight by various agencies. These agencies require registration by the Firm and its supervised persons. As a registered entity, Big Sky is subject to examinations by regulators, which can be announced or unannounced. We are required to

periodically update the information provided to these agencies and to provide various reports regarding its business activities and assets.

Josh Horton may be reached at (406) 315-2627.

ITEM 7: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Josh Horton has not been involved in any arbitration claim alleging damages in excess of \$2,500. Furthermore, he has neither been involved in nor found liable in any civil, self-regulatory organization, or administrative proceeding nor has been the subject of any bankruptcy petitions.