Firm Brochure

(Part 2A of Form ADV)

CTA Wealth Advisors, Inc.
290 E. Verdugo Avenue, Suite 205
Burbank, CA 91502
(818) 841-1746
(818) 841-1954 fax
www.ctawealthadvisors.com

This brochure provides information about the qualifications and business practices of CTA Wealth Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at: (818) 841-1746, or by email at: info@ctawealthadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission.

CTA Wealth Advisors, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about CTA Wealth Advisors, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is **113007**.

May 1, 2020

Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

This Firm Brochure is our disclosure document prepared according to the requirements and rules.

This brochure dated May 1, 2020, serves as an update to the last annual update of the brochure.

Our regulatory assets under management exceed $100 million and accordingly, we are transitioning from the State of California Registered Investment Advisor registration to the Securities Exchange Commission (SEC) registration.

Advisory services are now being offered by CTA Wealth Advisors, Inc.

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (818) 841-1746 or by email at: info@ctawealthadvisors.com.

You can also receive a copy of the most recent brochure and additional information regarding CTA Wealth Advisors, Inc. from www.adviserinfo.sec.gov. Select "Investment Adviser Search" select "Investment Adviser Firm" and type in our Firm name.

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Advisory Business

Firm Description

CTA Wealth Advisors, Inc. (originally Cameron Thornton Associates) ("CTA") was founded in 1982.

CTA is a SEC Registered Investment Advisor with its principal place of business in located in Burbank, CA. Investment advisory services are offered through its Investment Advisory Representatives (Advisory Representatives).

CTA provides personalized confidential financial planning and investment management to individuals, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Our investment strategies are based on the concepts of Modern Portfolio Theory, which we believe identifies the most efficient combination of assets to establish a growth or income portfolio that will help preserve assets with a risk level appropriate for each individual investor we serve. Once the asset mix has been determined, the Adviser may either manage the assets directly or recommend one or more third party money managers to help implement the allocation strategy. While our goal is to help clients achieve investment success, we offer no guarantee that our advice will result in profit or provide protection from a loss.

Separate and apart from their registration as Advisory Representatives of CTA, all Advisory Representatives of CTA are also Registered Representatives of Cetera Advisor Networks LLC (Cetera), a non-affiliated broker/dealer and SEC Registered Investment Advisor.

Securities are offered through Cetera Advisor Networks LLC, member SIPC.

Cetera is also a member of the Financial Industry Regulatory Authority (FINRA) and various other regulatory bodies. Advisory Representatives of CTA and Cetera are subject to certain FINRA supervisory obligations. Cetera does not provide any investment advisory services in conjunction with or as part of the financial planning and/or investment advisory services provided by CTA.

Securities execution, custodial and other administrative services are provided by Cetera Advisor Networks LLC and its clearing firm, Pershing LLC (Pershing), Charles Schwab or by other firms, such as mutual fund companies, variable annuity sponsors, variable life insurance sponsors, and others. In no event will CTA or Cetera accept or maintain custody of a client's funds or securities for a CTA advisory account (discussed under "Types of Advisory Services").

Advisory Representatives of CTA may sell annuities, insurance, individual stocks, individual bonds, mutual funds, limited partnerships, or other commissioned products.

CTA does not compensate individuals for client introductions.

Investment advice is provided, with the client making the final decision on investment selection. CTA does not act as a custodian of client assets. The client always maintains asset control.

CTA may provide a written evaluation of each client's initial situation, often in the form of an Executive Summary. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended.

Other professionals (i.e. lawyers, accountants, insurance agents, etc.) may be engaged directly by the client on an as-needed basis. We believe that collaborative teams of professionals can and should exist for the sole benefit of the client. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

CTA reserves the right to charge a fee for the initial client meeting, which may be by telephone. CTA employs an exploratory interview process to determine if our services provide a benefit for both the client and CTA.

Principal Owners

Cameron M. Thornton, CFP® is the President of CTA Wealth Advisors, Inc. and the Principal of Cameron Thornton Associates (tax preparation and consulting services). Trevor M. Cole, CFP® is the Secretary of CTA Wealth Advisors, Inc.

Types of Advisory Services

CTA provides advisory services through our proprietary program known as The Wealth Development System™.

The Wealth Development System™ is a customized and wide-ranging wealth growth and preservation process that enables CTA to assist its clients in trying to achieve their lifetime goals by eliminating the guesswork from financial planning. The Wealth Development System™ preaches discipline, diversification, patience, and adherence to long-term investment principles. Through implementation of The Wealth Development System™, CTA follows a general process, enumerated in the individual components of The Wealth Development System™ not limited to data gathering, identifying client goals, analyzing relevant information, identifying problems, writing recommendations and implementing an investment strategy.

Specific services provided by CTA include, but are not limited to:

- Assisting the client in setting and monitoring goals and objectives
- Building a risk management profile for the client
- Reviewing the client's present financial condition
- Issuing a written report of recommendations as necessary
- Monitoring and tracking assets under management
- Providing the client with financial statements for specific time periods
- Advising the client on steps necessary to maintain the existing asset allocation strategy through the repositioning of assets, when appropriate
- Quarterly market commentaries
- Periodic newsletters on current topics of interest
- Other services, as may be requested by the client

These services are broken down into the following individual components of The Wealth Development System™:

The Strategic Profile Process™ - The Strategic Profile Process™ is a data gathering discovery methodology that clearly identifies crucial financial issues to be evaluated during a 12 to 36-month period. This will involve one-on-one consultation from an Advisory Representative of CTA, which may be completed in person or over the phone.

The Critical Factors Analysis™ - The Critical Factors Analysis™ is a strategic evaluation of a client's strengths and critical weaknesses. This process whittles down gathered information to clearly identify relevant factors of a client's financial situation. This may involve the delivery of a written plan and/or an Executive Summary specific to your financial situation.

The Breakthrough Blueprint™ - The Breakthrough Blueprint™ is an easy-to-follow roadmap designed to lead the client to the achievement of life goals. The Breakthrough Blueprint™ is developed after the completion of The Strategic Profile Process™ and The Critical Factors Analysis™. This process results in the development of a personalized Investment Policy Statement and Asset Allocation analysis, and includes implementation of recommendations.

The Strategic Monitoring System™ - The Strategic Monitoring System™ provides for the planned periodic review and evaluation of client investment assets under management and client estate planning goals. CTA offers multiple investment supervisory services, also known as asset management services (discussed below under "Advisory Service Agreement").

The Retirement Feasibility Solution™ - The Retirement Feasibility Solution™ is a system through which CTA calculates projected retirement cash flow based upon employer pension programs and an individual's working capital. We define working capital to be assets available for funding future cash flow. This process may also incorporate The Pension Maximization Analysis™ (in which strategies for cash flow maximization are reviewed with the client) or The Pension Distribution/IRA Rollover Technique™ (in which strategies for lump-sum distribution of employer pension benefits and/or other employee retirement benefits are analyzed to determine the ideal process to follow to maximize client benefit).

The Entrepreneur's Business Enhancement Process™ - The Entrepreneur's Business Enhancement Process™ provides one-on-one and team coaching to successful entrepreneurs and their management teams. This process is designed to provide dynamic strategies to position businesses for successful long-term growth and profitability.

On more than an occasional basis, CTA furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues and trust services that often include estate planning.

All material conflicts of interest are disclosed regarding CTA, its representatives and any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

As of December 31, 2019, CTA managed approximately $120,674,266 in assets, on a non-discretionary basis, for 20 families on our proprietary Investment Update Service™ program and 92 families participating in Loring Ward Advisor Services program. As an investment adviser representative with Cetera Advisor Networks LLC, CTA managed approximately $9,131,020 in assets for 7 families on Cetera's Preferred Asset Management program. These investment management programs are discussed in detail later under the heading "Advisory Service Agreement." Clients may participate in more than one investment program.

Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system.

If CTA is ultimately responsible for managing your investment assets, we will create a Breakthrough Blueprint and Investment Policy Statement. The Breakthrough Blueprint™ is an asset allocation analysis based on your investment objectives and experience, time horizon, risk tolerance, and financial situation. Investment policy statements are created to help establish parameters around your investment assets and to help further explain the investment philosophy we employ. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Types of Agreements

The following agreements define the typical client relationships:

- Financial Planning Service Agreement
- Advisory Service Agreement
- Retainer Engagements
- Tax Preparation
- Hourly Planning Engagements

Financial Planning Service Agreement

CTA offers financial planning services to select individuals, families, pension and profit-sharing plans, trusts, corporations, and others. As CERTIFIED FINANCIAL PLANNERS™, Cameron M. Thornton and Trevor M. Cole lead the planning process, responsibly assisting clients to identify their individual goals and objectives.

Clients sign a Financial Planning Service Agreement prior to the onset of CTA's research and evaluation. The Financial Planning Service Agreement describes, in detail, the scope of each client's individual plan and other important aspects of the planning process. Termination of the Financial Planning Service Agreement may be made in writing by either party. Upon termination, CTA will refund any unused portion of the fee, if applicable.

CTA offers a wide range of financial planning services to clients in the form of The Wealth Development System™, as discussed above under the heading "Types of Advisory Services."

The financial planning work for a client will usually include general recommendations for a course of activity or specific actions to be taken by a client. Recommendations may be made that clients obtain insurance or revise existing coverage, establish retirement accounts, increase or decrease funds in savings accounts or invest in securities. CTA may also develop or recommend certain retirement, estate or tax plans or refer clients to an accountant or attorney.

As part of the financial planning analysis and engagement, CTA and its Advisory Representatives may assist clients in determining their investment goals and objectives along with risk tolerance and retirement time horizons. CTA may recommend an initial asset allocation to fund certain long-term objectives such as buying a home, planning for college or retirement, etc.

For retirement assets held outside the control of CTA and Cetera, such as external pension, profit sharing, 401(k) and 403(b) plans, clients will be responsible for implementing all recommendations accepted. Further, CTA will neither provide *Continuous Supervisory* or *Portfolio Monitoring* services for such accounts nor receive ongoing asset-based compensation. However, clients will be able to engage

Advisory Representatives to conduct a review of such accounts on a periodic or annual basis for an hourly or fixed-fee.

Financial planning services may or may not result in the establishment of an ongoing investment management relationship after the financial plan is completed. Detailed investment advice and specific recommendations may be provided as part of a financial plan. Implementation of any recommendations is at the discretion of the client.

The professional fees for financial planning, including components of estate planning range from $85 per hour to $750 per hour, but may also be billed on a flat per-project basis. Such flat per-project fees will typically range between $2,500 and $10,000, subject to negotiation.

Fees for financial planning will vary according to the complexity of the engagement.

In the event that the client's situation is substantially different than disclosed at the initial meeting, a revised fee will be provided for mutual agreement. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

After delivery of a financial plan, and in the absence of an Advisory Service Agreement, future face-to-face meetings may be billed separately at our hourly rates discussed below with a minimum fee of $475.

Advisory Service Agreement

Most clients choose to have CTA manage their investment assets in order to obtain ongoing in-depth advice and life planning services.

CTA's proprietary fee-based investment asset management program is known as the Investment Update Service™. All services offered through this platform are on a non-discretionary basis.

Clients are involved in the management of their accounts to the degree they choose, and are free to impose reasonable investment restrictions. CTA welcomes calls from clients at the office any time during normal business hours. It is the responsibility of each client to keep CTA informed of his or her financial situation to the extent that changes in that situation may affect the most prudent course of investment action.

CTA will provide investment supervisory services based on a prior-established client profile, typically documented in what is known as an Investment Policy Statement. Investment policy is determined through personal discussions in which goals and objectives based on particular circumstances are established. In general, accounts are managed in accordance with the client's individual needs, risk tolerance, objectives and reasonable investment restrictions by purchasing and/or selling securities.

The Investment Update Service™ allows the client to maintain investments in cash and cash-equivalent assets, stocks, bonds, institutional class, no-load or load-waived mutual funds, load mutual funds, variable annuity sub-accounts, variable life insurance sub-accounts and other asset types for a percentage of the assets being managed.

As previously mentioned, securities execution, custodial and other administrative services are provided by Cetera and its clearing firm, Pershing LLC.

The current ticket charges to CTA for Investment Update Service™ clients charged by Cetera and Pershing are summarized as follows:

- Listed Equities - $19.00 plus (+) $0.015 cents per share
- OTC Equities - $22.00
- Exchange Traded Fund (ETF) - $22.00
- Exchange Traded Corporate Bonds - $30.00 per ticket plus $1.00 per bond
- OTC Corporate Bonds - $35.00 per ticket
- Municipal Bonds - $40.00 per ticket
- Treasuries - $35.00 per ticket
- Agencies and Zeros - $45.00 per ticket
- Money Market Instruments, including Certificates of Deposit and Commercial Paper - $35.00 per ticket
- No-Load Mutual Funds[1] - $20.00 per ticket
- Unit Investment Trusts - $30.00 per ticket
- Load Mutual Funds at NAV - $15.00
- Mutual Fund Exchanges - $0.00 round trip

Based on the type of transaction, Cetera/Pershing will generate a corresponding confirmation of the trading activity. Depending on the transaction type, these Ticket Charges will be reported as either a “Commission” or “Trade Cost” on the trade confirmation.

A confirmation processing and handling fee of $4.95 per transaction and certain other miscellaneous charges are also applicable. This charge will be reported on the confirmation as a “Service Charge.”

Investors who participate in the Investment Update Service™ are individuals who invest with a long-term focus. These investors understand the long-term nature of an investment plan and understand that patience is an important virtue when seeking to achieve financial goals. It is important that CTA be apprised of changes to the client’s financial situation and investment objectives as they may occur along the way.

[1] Certain funds have an additional $10.00 ticket charge. Registered Representatives can view a full list of individual funds that contain the $10.00 surcharge using the Mutual Fund CUSIPS with Surcharge report (ID MFN951D4) via the NetX360 Report Center. No-load ticket charges apply for the investor advisor class shares.

Each client participating in the Investment Update Service™ will receive confirmations from Pershing, or other account custodians, of every transaction within the account. They will receive monthly statements directly from Pershing or the custodian for any month in which there was account activity. They will also receive detailed performance reports from CTA that include data provided by Pershing, mutual funds, other custodians, and other sources deemed to be reliable by CTA in accordance with the client report cycle. Because of the relationship among CTA, Cetera and Pershing, charges and fees for the execution of transactions in the Investment Update Service™ account may be higher than other accounts available through Pershing, Cetera, directly with mutual fund or annuity companies, or through unrelated broker/dealers.

The annual management fee for the Investment Update Service™ is negotiable and based on the value of assets in the account (not including the value of any limited partnership or similar illiquid investment). Fees typically run between 0.6% and 1.0% per year. However, a minimum annual fee of $5,000 applies.

Annualized investment advisory fees are described in detail in the Investment Update Service™ Agreement signed by each client. The client should review, in detail, the Agreement for specific charges related to the client's account.

Investment Update Service™ account fees are paid in arrears, upon receipt of an invoice, following every investment cycle. Cycles are quarterly or semi-annually as described in the Investment Update Service Agreement. The fee is payable following the first investment cycle. The fee is based on the account value at the end of the cycle. Thereafter, fees are payable following each successive investment or billing cycle. Additional deposits to the account are subject to the same fee procedures.

Other fees unrelated to the account's investment advisory/management services may include retirement plan administration fees or account termination fees and will vary from account to account. In all instances, CTA will provide the client with appropriate documentation and information to explain other account charges and fees. Fees will not be based upon a share of capital gains or capital appreciation of the funds or any portion of the funds of an advisory client. Clients should also note that fees for comparable services vary and lower fees for comparable services may be available from other sources.

CTA may not change the account fees payable by a client for an Investment Update Service™ account without 30 days prior written notice.

Under the supervision of Cetera Advisor Networks LLC, an Advisory Representative of CTA may refer clients to third-party money managers. Full disclosure will be provided at the time. Disclosure brochures will be provided directly from these third parties which will detail the program, services and fees. CTA does not directly sponsor or participate in any wrap fee programs nor does CTA receive any form of referral fee compensation.

Among the third-party programs to which CTA and Advisory Representatives may refer clients is Cetera's Preferred Asset Management program which is a proprietary asset management program offered by Cetera Advisor Networks LLC.

CTA retains an independent third-party account administrator BAM Advisor Services, LLC d/b/a Buckingham Strategic Partners (BSP) that performs certain services such as account administration, portfolio allocation analysis and non-discretionary implementation, back-office fulfillment, report and statement production, and billing services. Services are paid for directly through advisory fees billed to the client or are indirectly paid by CTA. Buckingham is an investment adviser registered with the Securities and Exchange Commission.

Buckingham Strategic Partners (BSP) does not have investment discretion over client assets. The client directs and designates the broker-dealer and custodian to execute transactions in his/her account from among those broker-dealer custodians that have an existing relationship with BSP. Buckingham Strategic Partners requires that a client designate a custodian from among Pershing Advisor Solutions LLC ("Pershing"), Fidelity Brokerage Services LLC ("Fidelity"), Charles Schwab & Company, Inc. ("Schwab"), or TD Ameritrade Institutional ("TD Ameritrade"). Schwab, Fidelity, Pershing and TD Ameritrade are unaffiliated SEC registered investment advisers and FINRA member broker dealers. Each offers to independent advisor's services which include custody of securities, trade execution, clearance and settlement of transactions. Neither CTA nor BSP seeks better execution services or prices from brokers or dealers other than that chosen by the client, which may result in the client paying higher commissions, transaction costs or spreads, or receiving less favorable net prices on transactions for the client's account.

Buckingham Strategic Partners (BSP) may also sponsor educational seminars for the benefit of CTA and its clients. Such educational seminars provide CTA with access to information and ideas regarding practice development, client servicing, investment strategy, relationship management and financial planning. Attendance expenses associated with such educational seminars may be paid or reimbursed, either in whole or in part, by BSP.

CTA Wealth Advisors, Inc. may recommend, where appropriate, that client invest in shares of the SA Funds – Investment Trust (the "SA Funds"), a family of ten asset class mutual funds that are advised, managed, and administered by Buckingham Strategic Partners. Buckingham does not charge fees directly on investments into the SA Funds because Buckingham receives certain fees and expenses directly from the SA Funds, as disclosed in each SA Fund's prospectus.

For Buckingham Strategic Partners' accounts, we charge the following fees, subject to negotiation:

Advisor Management Fee Schedule for Buckingham Strategic Partners' accounts (graduated fee):

	Annual Fee
Amounts from $0.00 to $1,000,000.00	1.00%
Amounts between $1,000,000.01 to $2,000,000.00	0.80%
Amounts above $2,000,000.01	0.60%

Buckingham Strategic Partners Administration and Servicing Fees (graduated fee):

	Annual Fee
Accounts valued from $0.00 to $500,000.00	0.50%
Accounts valued from $500,000.01 to $1,000,000.00	0.20%
Accounts valued from $1,000,000.01 to $5,000,000.00	0.15%
Accounts valued above $5,000,000.01	0.10%

Retainer Engagements

In some circumstances, a retainer-based relationship is established when it is more appropriate to work on a fixed-fee basis. In this instance, CTA will execute a Financial Planning Service Agreement to reflect such an engagement. The fee for a retainer engagement is based on our hourly planning fees discussed below and is negotiable.

Hourly Planning Engagements

CTA provides hourly planning services for clients who need advice on a limited scope of work.

The current hourly fees charged by CTA are summarized as follows:

Advisory Supervisor Cameron M. Thornton, CFP® - an hourly fee range between $300 to $750 per hour. The actual fee to be charged for Mr. Thornton's professional time will be determined based on the scope and risk of the engagement.

Advisory Representative and CERTIFIED FINANCIAL PLANNER™ Trevor M. Cole, – an hourly fee of $200 per hour.

Staff Paraplanner – an hourly fee of $100 per hour.

Other support staff, including Database Manager and Case Writer – an hourly fee of $85 per hour.

Asset Management

Assets are invested primarily in no-load or low-load mutual funds and exchange-traded funds, through Pershing LLC, Charles Schwab, or fund companies. Fund companies charge each fund shareholder an investment management fee that is disclosed in the fund prospectus. Transaction fees may be charged for the purchase of some funds.

Stocks and bonds may be purchased or sold through a brokerage account with Pershing LLC or Charles Schwab. Fees may be charged for stock and bond trades placed through them. Investments may also include: equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable life insurance, variable annuities, and mutual funds shares), U. S. government securities, and interests in partnerships.

CTA may suggest illiquid investments in various types of limited partnerships or real estate investment trusts (REITs). Clients owning any limited partnership units are advised that such units are generally illiquid, long-term investments. Partnership values may differ significantly from original cost. Limited partnership holdings are shown unpriced. Accurate valuation information may not be available. In that event, the client should refer to reports received from the General Partner with regard to the current operation and status of the investment. When limited partnerships are valued, such values reflect only the General Partner's evaluation. There is no assurance that this value would be realized upon the sale of these units or the conclusion of the program.

Initial public offerings (IPOs) are not available through CTA.

Termination of Agreement

A Client may terminate any of the aforementioned agreements at any time by notifying CTA in writing without penalty.

Clients have the right to terminate Agreements without penalty or incurring advisory fees within five (5) business days of the date the Agreement is signed. If an Agreement is terminated after five (5) business days, any earned fees will be due and all unearned fees will be returned on a pro-rata basis.

CTA may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, CTA will refund any unearned portion of the advance payment.

Fees and Compensation

Description

CTA bases its fees on a percentage of assets under management, fixed fees, or hourly charges. For additional information, please see the Advisory Business section for various fee structures.

Financial Planning Service Agreements will be priced based on the complexity of the work required associated with the client situation.

Fees are negotiable.

Fee Billing

Investment management fees for Investment Update Service™ clients are billed quarterly or semi-annually, in arrears, meaning that we invoice you after the three-month or six-month billing period has ended. Payment in full is expected upon invoice presentation.

Fees may be deducted from a designated client account to facilitate billing. In this instance, CTA will provide the client with a letter of instruction which requires client signature(s). The signed letter of instruction will be forwarded to the applicable custodian for management fee payment. The custodian will forward payment directly to CTA.

Investment management fees for Cetera Advisor Networks LLC Preferred Asset Management clients as well as investment management fees for Buckingham Strategic Partners clients are billed quarterly, in advance. This means that Cetera and Buckingham will invoice you at the beginning of the three-month billing period. The fee billed is based on the previous quarter ending balance (i.e. fees for the first quarter are based on the December 31st balance). Fees are deducted from a designated client account to facilitate billing. The fee amount is disclosed with quarterly reports. However, an alternate account may be used to facilitate billing. The client must consent in advance to direct debiting of their investment account for an alternate account to be used.

Fees for financial plans are billed upon the completion and delivery of the financial plan and/or Executive Summary. Fees for retainer or hourly engagements are billed as fees are earned on a monthly or quarterly basis.

Other Fees

As mentioned above under the heading "Advisory Service Agreement," certain ticket charges apply to Investment Update Service™ clients charged by Cetera and Pershing. In our opinion, these transaction charges are small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

CTA, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (i.e. historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Certain mutual funds in which the client may invest may distribute payments to broker-dealers. Such payments may be distributed pursuant to a 12b-distribution plan or other such plan as compensation for administrative services and are distributed from the fund's total assets. The Advisory Associate may be eligible to receive such service fees or similar types of compensation through Cetera. The receipt of commissions or other financial benefits may also be received as disclosed in the mutual fund prospectus or other documents describing such investments or transactions. Any such fee distributed by the mutual fund to Cetera and/or Advisory Associate is not considered in the calculation of fees, nor are such fees credited back to the client's account.

This practice presents a conflict of interest in that there may be an incentive to recommend investment products based on the compensation received, rather than on a client's needs. This conflict of interest is addressed on a case-by-case basis.

Clients have the option to purchase investment products recommended through other brokers or agents not affiliated with CTA.

Additional information may be found in the "Other Financial Industry Activities and Other Business Activities" section of this brochure.

Expense Ratios

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.50% for their services. These fees are in addition to the fees paid by you to CTA Wealth Advisors, Inc.

Past Due Accounts and Termination of Agreement

See "Termination of Agreement" above for details. CTA reserves the right to stop work on any account that is overdue. In addition, CTA reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in CTA's judgment, to providing proper financial advice.

Performance-Based Fees

Sharing of Capital Gains

CTA does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Types of Clients

Description

CTA Wealth Advisors, Inc. generally provides investment advice to individuals and families, including high net worth individuals, pension and profit-sharing plans,

trusts, estates, charitable organizations, corporations or other business entities.

Client relationships vary in scope and length of service.

Account Minimums

The minimum account size is $500,000.00 of assets under management. However, CTA Wealth Advisors, Inc. may waive the account minimum.

Clients receiving ongoing asset management services under our Investment Update Service™ program may be assessed a minimum annual fee. Clients with assets below the minimum account size may pay a higher percentage rate on their annual fees than the fees paid by clients with greater assets under management.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include charting, fundamental analysis, technical analysis, and cyclical analysis.

Sources of information may include research materials prepared by others, annual reports, inspections of corporate activities, corporate rating services, timing services, prospectuses, filings with the Securities and Exchange Commission, company press releases, financial newspapers and magazines.

Other sources of information that CTA Wealth Advisors, Inc. may use include Morningstar Office information, Albridge information, Envestnet information, Yahoo! Finance, Google Finance, and the World Wide Web.

Investment Strategies

The primary investment strategy used on client accounts is strategic asset allocation strategies developed by Harry Markowitz and Bill Sharpe. For some clients, we will implement a core and satellite approach. Primarily, we use passively-managed structured investment asset class funds and exchange-traded funds as the core investments. However, we may use actively-managed funds where in our opinion there may be greater opportunities for a higher total return. We recommend globally diversified portfolios to help control the risk associated with traditional markets.

The investment strategy we develop for a specific client is based upon the investment objectives and experience, time horizon, risk tolerance, and financial situation. The client may change any of these stated objectives at any time.

Other investment strategies may include short-term trading and margin transactions.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Investing in securities involves risk of loss that clients should be prepared to bear. Investors face the following investment risks:

- 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 inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- 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: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. 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.
- Financial Risk: Financial risk is an umbrella term for any risk associated with any form of financing. Companies must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Disciplinary Information

Legal and Disciplinary

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of CTA or the integrity of CTA's management.

CTA and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Other Business Activities

Financial Industry Activities

CTA Wealth Advisors, Inc. is not registered as a securities broker-dealer, a futures commission merchant, commodity pool operator or commodity trading advisor.

Tax Preparation[2]

Since 1982, Cameron M. Thornton, CFP®, has owned and operated a tax preparation practice. Associated persons of Cameron Thornton Associates may be registered tax preparers with the California Tax Education Council (CTEC).

Tax preparation work performed is separate from our Financial Planning Service Agreement, Advisory Service Agreement, or Retainer Engagement.

Fees for tax preparation work are billed hourly. Cameron's hourly rate is $300/hr. In addition to the hourly rate, a minimum overhead fee is charged to each return prepared.

Eligible federal and applicable state returns are filed electronically.

Other Business Activities

CTA has arrangements that are material to its advisory business or its clients who is a broker-dealer, other investment advisor, insurance company or agency.

Advisory Representatives of CTA are Registered Representatives and Registered Principals of Cetera Advisor Networks LLC and insurance agents/brokers of various insurance companies. In such capacities, these associated persons may receive normal commissions and/or other compensation directly from applicable insurance companies.

Advisory Representatives of CTA are registered securities representatives of Cetera Advisor Networks LLC, a registered broker-dealer, member FINRA/SIPC, and a registered investment adviser. Cetera is a diversified financial services company engaged in the sale of specialized investment products. Advisory Representatives of CTA may recommend securities or insurance products offered by Cetera and receive normal commissions if products are purchased through them. Thus, a conflict of interest exists between the interests of the Advisory Representatives and those of the advisory clients. Clients are under no obligation to purchase products recommended

[2] No CTA client is obligated to use the Tax Preparation Services of Cameron Thornton or any associated person and conversely, no Tax Preparation Services client is obligated to use the advisory services provided by CTA.

by these Advisory Representatives or to purchase products either through these Advisory Representatives or Cetera.

Under the rules and regulations of Financial Industry Regulatory Authority (FINRA), Cetera has obligations to maintain records and perform other functions regarding certain aspects of the investment advisory activities of its Registered Representatives in relation to certain advisory accounts for which its Registered Representatives provide investment advice. These obligations require Cetera to coordinate with, and have the cooperation of the account custodian. In order to fulfill its obligation, Cetera has established a list of custodian and brokerage firms with which it has arranged to obtain the required cooperation and which, therefore, may be utilized for custody of accounts directly advised either by Registered Representatives of Cetera who are investment advisers or other investment advisory entities which are affiliated with Registered Representatives of Cetera. In certain instances, Cetera will collect, as paying agent for the Adviser, the investment advisory fee remitted to the Adviser by the account custodian, and Cetera will retain a portion as a charge to the investment advisor (not the client) for the functions Cetera is required to carry out by FINRA. This fee will not increase execution or brokerage charges to the client or the fee the client has agreed to pay to the Adviser pursuant to the client's advisory agreement. A portion of the fee retained by Cetera may be re-allowed to other Registered Representatives of Cetera, who, as Registered Representatives of Cetera, are responsible for the supervision of other representatives and assist Cetera with the functions described above.

Since 1982, Cameron M. Thornton, CFP®, has owned and operated a tax preparation practice. Associated persons of Cameron Thornton Associates may be registered tax preparers with the California Tax Education Council (CTEC).

Tax preparation work performed is separate from our Financial Planning Service Agreement, Advisory Service Agreement or Retainer Engagement.

Fees for tax preparation work are billed hourly. Cameron's hourly rate is $300/hr. In addition to the hourly rate, a minimum overhead fee is charged to each return prepared.

Eligible federal and applicable state returns are filed electronically.

In 2006, Cameron M. Thornton, CFP® merged his intellectual property and intellectual capital with The Heritage Institute, expanding his family legacy and philanthropy consultancy. Working in his role as a Certified Wealth Consultant™ within The Heritage Institute's The Heritage Process™, this business is guided by the idea that a bridge must be built between traditional financial and estate planning and the family so that an orderly and successful transition of a family's values along with their wealth can occur. Cameron provides these services as an individual consultant and as a partner with Navigator Legacy Partners, LLC.

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

Code of Ethics

CTA Wealth Advisors, Inc. has adopted a Code of Ethics for all supervised persons of the firm describing its high standards of business conduct and fiduciary duty to its clients. The Adviser and its personnel owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics includes provisions relating to general principles, covered securities, responsibility, duty to clients, compliance with laws and regulations, privacy of customer financial information, conflicts of interest, use of disclaimers, suitability, duty to supervise, personal securities transactions, insider trading, marketing and promotional activities, certification of compliance, reporting violations, sanctions, acknowledgement, among other things.

The Adviser will provide a copy of the Code of Ethics to any client or prospective client upon request.

Participation or Interest in Client Transactions

CTA and its employees may buy or sell securities that are also held by clients. Employees may not trade their own accounts ahead of client trades and at no time will CTA or any related person receive an added benefit or advantage over clients with respect to these transactions. Employees will comply with all provisions of CTA's Code of Ethics. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of CTA will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts.

The Adviser will maintain a record of personal securities transactions. The Adviser will not permit insider trading and has implemented procedures to ensure that its policy regarding insider trading is being observed by Advisory Representatives and associated staff.

Affiliated persons of CTA may trade in their personal account the same securities as a client on an aggregated basis consistent with CTA's obligation of best execution.

It is CTA's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. CTA will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to an advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a

transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as a broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Personal Trading

The Chief Compliance Officer of CTA Wealth Advisors, Inc. (CTA) is Cameron M. Thornton, CFP®. The Director of Compliance of CTA is Trevor M. Cole, CFP®. Cameron reviews all employee trades each quarter. In Cameron's absence, Trevor will assume the employee review responsibility. Cameron's trades are reviewed by Trevor M. Cole, CFP®.

The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

Brokerage Practices

Selecting Brokerage Firms

CTA Advisory Representatives are Registered Representatives of Cetera Advisor Networks LLC and may suggest that clients execute transactions through Cetera. If clients freely choose to execute transactions through Cetera, such Advisory Representatives may receive the normal commissions and/or other compensation.

Registered Representatives of Cetera Advisor Networks LLC who are also independent Investment Advisers are limited to securities products that are offered by Cetera. Other suitable investment products may be available through other broker/dealers or investment advisers. A conflict of interest exists because of Cetera Advisor Networks LLC and the Adviser's duty to provide unbiased advice to clients and the potential receipt of commissions on transactions effected through Cetera Advisor Networks LLC.

In placing its orders to purchase or sell securities in accounts, principals of the firm may elect to aggregate orders. In so doing, the firm will not aggregate transactions unless aggregation is consistent with its duty to seek best execution and the terms of adviser's investment advisory agreement with each client for which trades are being aggregated. This process will ensure that no advisory client will be favored over any other client and each client that participates in an aggregated order will participate at the average share price for all adviser's transactions in that security on a given business day, with transaction costs shared pro-rata based on each client's participation in the transaction. Trades for personal accounts of associated persons may also be included in the Adviser's block transactions to uphold the Adviser's Code of Ethics.

CTA may recommend that clients select the following custodians: Pershing, LLC ("Pershing") and Charles Schwab & Company, Inc. ("Schwab") which are members of FINRA and the Securities Investor Protection Corporation (SIPC) and are registered broker/dealers. Pershing and Schwab maintain custody of clients' assets and Pershing effect trades in client accounts. This recommendation may be based in part on the benefits to applicant, such as the availability of some of products and services and not solely on the nature, cost, or quality of custody provided by Schwab and Pershing as well as brokerage services provided by Pershing which creates a conflict of interest.

CTA Wealth Advisors, Inc. is independently owned and operated, and is not affiliated with Schwab or Pershing. Some factors that CTA considers prior to recommending custodians include their financial strength, reputation, execution, pricing, and service.

Pershing provides CTA Wealth Advisors, Inc. and/or its IARs with access to institutional trading, portfolio management, brokerage and custodial services, research, and access to mutual funds and other investments that are otherwise generally available only for institutional investors or would require a higher minimum initial investment.

Pershing does not charge a separate fee for custody of CTA Wealth Advisors, Inc. client accounts that they maintain, but are compensated by the account holders through commissions or other transaction-related fees for security trades that are executed through them or settle into their accounts.

CTA Wealth Advisors, Inc. may receive other products and services from Pershing that benefits CTA, but not client accounts. Some of these other products and services assist CTA in managing and administering client accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), facilitate payment of CTA's fees from client's accounts, and assist with back office functions, record keeping and client reporting. These services may be used to service all or a substantial number of client accounts, including accounts not maintained at Pershing.

CTA Wealth Advisors, Inc. may also receive services from Pershing that are intended to help CTA manage and further develop its business. These services may include information technology, regulatory compliance, and marketing. In addition, Pershing may make available, arrange and/or pay for these types of services rendered to CTA by independent third parties. Pershing may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of the third party providing these services to CTA.

For Pershing accounts, CTA Wealth Advisors, Inc. may receive "platform" services. The platform services include, among others, brokerage, custodial, administrative support, recordkeeping, and related services that are intended to support intermediaries such as CTA in conducting business and serving the best interests of clients. These

may also be a benefit to CTA, which may otherwise have to pay for such items at its own expense.

Pershing charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e. transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt security transactions). Pershing enables CTA Wealth Advisors, Inc. to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Pershing's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Pershing may be higher or lower than those charged by other custodians and broker/dealers. As part of the arrangement, Pershing may also make available to CTA, at no additional charge, certain research and brokerage services, including research services obtained by Pershing directly from independent research companies, as selected by CTA. Some research packages may be selected by CTA from the Pershing system and do incur an additional charge to CTA. For example, these research and brokerage services presently may include those provided by Reuters, Standard and Poor's, and Bloomberg, and may be used by CTA to manage accounts and provide advice to all clients regardless as to whether such clients use Pershing.

CTA Wealth Advisors, Inc. may recommend that clients establish brokerage accounts with Charles Schwab & Company, Inc. ("Schwab"), a FINRA registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although we may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab.

CTA Wealth Advisors, Inc. is independently owned and operated and not affiliated with Schwab.

Schwab provides CTA Wealth Advisors, Inc. with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Schwab. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to our firm other products and services that benefit CTA Wealth Advisors, Inc. but may not directly benefit our clients' accounts. Many of these products and services may be used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

i. provide access to client account data (such as trade confirmations and account statements;

ii. facilitate trade execution and allocate aggregated trade orders for multiple client accounts;

iii. provide research, pricing and other market data;

iv. facilitate payment of our fees from clients' accounts; and

v. assist with back-office functions, recordkeeping and client reporting.

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

i. compliance, legal and business consulting;

ii. publications and conferences on practice management and business succession; and

iii. access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to CTA Wealth Advisors, Inc. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm.

Schwab may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that client's custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a conflict of interest.

Best Execution

CTA reviews the execution of trades at each custodian each quarter. The review is documented in CTA's books and records. Trading fees charged by the custodians is also reviewed on a quarterly basis. CTA does not receive any portion of the trading fees.

Soft Dollars

CTA Wealth Advisors, Inc. does not benefit from any type of Soft Dollar activities.

Order Aggregation

Most trades are mutual funds or exchange-traded funds where trade aggregation does not garner any client benefit.

Review of Accounts

Periodic Reviews

Formal account reviews are performed quarterly, semi-annually or annually by advisors Cameron M. Thornton, CFP® and/or Trevor M. Cole, CFP®. Ongoing regular account reviews are performed more frequently depending on the unique needs of the client.

Generally, each reviewer is assigned no more than 150 accounts; however, there may be exceptions made in cases where a particular reviewer is best qualified to review a particular account.

Review Triggers

Other conditions that may trigger a review are changes in market conditions, changes in tax law, new investment information, changes in a client's own situation, etc.

Regular Reports

Advisory clients of CTA Investment Update Service™ program receive portfolio reports prepared by CTA, based on third-party information and data deemed reliable by CTA. These reports summarize and analyze important portfolio information and are prepared quarterly, semi-annually or annually.

In addition, advisory clients receive written quarterly market reviews. CTA will send additional written communication as needed. CTA also sends email correspondence at various intervals throughout the year on various topics.

Financial planning clients receive a detailed initial written report based on information provided by the client and reviewed and evaluated by CTA. Financial Planning clients may opt to renew the agreement, at which time a new updated report will be prepared.

In addition to portfolio reports prepared and distributed to advisory clients by CTA, clients receive account statements from any custodians associated with the account. Generally, this is a brokerage firm or a product sponsor, such as a mutual fund company. These custodians also provide a written confirmation of each transaction in the account.

Client Referrals and Other Compensation

Incoming Introductions

CTA Wealth Advisors, Inc. has been blessed to receive many client introductions over the years. Introductions come primarily from existing clients. However, we also receive introductions from attorneys, accountants, employees and other sources. The firm does not compensate introducing parties for these introductions.

Introductions Out

CTA Wealth Advisors, Inc. does not accept referral fees or any form of remuneration from other professionals when a prospect or client is introduced to them.

Custody

Account Statements

CTA does not maintain custody of client assets.

All investment assets are held at qualified custodians. Clients should receive at least quarterly statements from the broker/dealer, bank or other qualified custodian that holds and maintains client investment assets.

Performance Reports

CTA urges you to carefully review such statements and compare such official custodial records to the account statements we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Investment Discretion

Discretionary Authority for Trading

At this time, CTA does not accept discretionary authority to manage securities accounts on behalf of clients.

Limited Power of Attorney

Clients participating in Buckingham Strategic Partners (BSP) program (described above under the heading “Advisory Service Agreement”) execute a Trading Authorization Limited to Purchases and Sales of Securities which allows BSP to place trades as required under CTA Wealth Advisors, Inc. advisement.

Buckingham Strategic Partners does not take custody of funds or securities.

Voting Client Securities

Proxy Votes

As a matter of firm policy and practice, CTA does not have authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. CTA may provide advice to clients regarding the clients' voting of proxies. Any existing conflicts of interest will be disclosed to the client.

Financial Information

Financial Condition

Registered investment advisers are required in this section to provide you with certain financial information or disclosure about CTA financial condition.

CTA does not have any financial impairment that will preclude the firm from meeting contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

A company balance sheet is not required to be provided because CTA does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than $1,200 per client, and six months or more in advance.

NOTE: Please see *Part 2B of Form ADV: Brochure Supplement* below to identify principal executive officers and management persons.

Part 2B of Form ADV: *Brochure Supplement*

Cameron Mitchell Thornton, CFP®

CTA Wealth Advisors, Inc.
290 E. Verdugo Avenue, Suite 205
Burbank, CA 91502
(818) 841-1746
(818) 841-1954 fax
www.ctawealthadvisors.com

May 1, 2020

This brochure supplement provides information about Cameron M. Thornton, CFP® that supplements the CTA Wealth Advisors, Inc. brochure (Part 2A of Form ADV). You should have received a copy of the CTA Wealth Advisors, Inc. brochure. Please contact us at: (818) 841-1746, or by email at: info@ctawealthadvisors.com if you did not receive the CTA Wealth Advisors, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about the representatives listed above is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Cameron M. Thornton, CFP® - Year of birth: 1954

Educational Background:

- University of Southern California, BA, Psychology, 1976
- University of La Verne, Master of Business Administration, 1983

Business Experience:

- Mr. Thornton is the Principal, Advisory Supervisor, and Chief Compliance Officer of CTA Wealth Advisors, Inc. Mr. Thornton is a Registered Principal and Investment Advisory Supervisor of Cetera Advisor Networks LLC (Cetera), member FINRA/SIPC, a broker/dealer and SEC Registered Investment Advisor. Mr. Thornton has been associated with Cetera since 1983. Mr. Thornton became a CERTIFIED FINANCIAL PLANNER™ in 1986 and a Certified Wealth Consultant™ in 2007.

Professional Certifications:

1. CERTIFIED FINANCIAL PLANNER™ (CFP®): Certified Financial Planners are licensed by the Certified Financial Planner Board of Standards, Inc. to use the CFP® mark.

   CFP® certification requirements:

   - Bachelor's degree (or higher) from an accredited college or university.
   - Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
   - Successful completion of the 10-hour CFP® Certification Exam.
   - Three-year full-time personal financial planning work experience.
   - Successfully pass the Candidate Fitness Standards and background check.
   - Continuing Education/Experience Requirements: 30 hours every two years.

2. CTEC (California Tax Education Council) Registered Tax Preparer: The State of California authorizes bonded CTEC-registered tax preparers to prepare or assist with the preparation of tax returns.

   CTEC Registered Tax Preparer requirements:

   - Successful completion of a CTEC-approved 60-hour, qualifying tax education course.
   - Maintain a $5,000 tax preparer bond.

- Obtain and register a Preparer Tax Identification Number (PTIN) with the IRS.
- Continuing Education/Experience Requirements: 20 hours of CTEC-approved continuing education each year.

Disciplinary Information

- Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Mr. Thornton does not have any history of disciplinary events.

Other Business Activities

- Cameron M. Thornton, CFP® is separately licensed as a Branch Manager and Registered Representative of Cetera Advisor Networks LLC, an unaffiliated FINRA member broker-dealer. Mr. Thornton in his separate capacity, can effect securities transactions for which he may receive separate, yet customary compensation. Mr. Thornton currently maintains the following securities registrations[3]: Series 7, Series 24, and Series 63.

  Mr. Thornton also holds multiple state insurance licenses. As such, he is able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients.

  A form of "indirect compensation" may also be paid to Mr. Thornton by sponsors of investment products, programs or services. This indirect compensation may include entertainment, attendance at events, attendance at educational conferences, reimbursements for approved business expenses, investment research, technology support and other resources that may assist with CTA's investment business.

  A conflict of interest exists between the interests of Mr. Thornton and those of the advisory clients. This practice may give Mr. Thornton an incentive to recommend investment products based on compensation received, rather

[3] Series 7 – The General Securities Representative (Series 7) qualifies a holder for the solicitation, purchase, and/or sale of all securities products, including corporate securities, municipal securities, municipal fund securities, options, direct participation programs, investment company products, and variable contracts.

Series 24 – The General Securities Principal exam (Series 24) qualifies individuals as general securities principals who can manage or supervise the member's (Broker-Dealer firm's) investment banking or securities business for corporate securities, direct participation programs, and investment company products/variable contracts.

Series 63 – The Uniform Securities Agent State Law (Series 63) qualifies holders as securities agents. The examination covers the principles of state securities regulation reflected in the Uniform Securities Act.

than on the client's needs. Clients are under no obligation to purchase products recommended by Mr. Thornton or to purchase products either through him or Cetera Advisor Networks LLC. The implementation of any or all recommendations is solely at the discretion of the client. CTA maintains a Code of Ethics requiring Mr. Thornton to always act in your best interest and to reduce potential conflicts of interest.

- Since 1982, Cameron M. Thornton, CFP® has owned and operated a tax preparation practice (Cameron Thornton Associates). Cameron is a registered tax preparer with the California Tax Education Council (CTEC) – www.ctec.org.
- In 2006, Cameron M. Thornton, CFP® merged his intellectual property and intellectual capital with The Heritage Institute, expanding his family legacy and philanthropy consultancy. Working in his role as a Certified Wealth Consultant™ within The Heritage Institute's The Heritage Process™, this business is guided by the idea that a bridge must be built between traditional financial and estate planning and the family so that an orderly and successful transition of a family's values along with their wealth can occur. Cameron provides these services as an individual consultant and as a partner with Navigator Legacy Partners, LLC.
- To stay up-to-date on the most current Other Business Activities, please refer to: http://brokercheck.finra.org.

Additional Compensation

- Mr. Thornton does not receive any additional compensation from third parties for providing investment advice to clients and does not compensate anyone for client referrals.

Supervision

- Cameron M. Thornton, CFP® is the President of CTA Wealth Advisors, Inc. and the Principal of Cameron Thornton Associates. He is responsible for all supervision, formulation and monitoring of investment advice offered to clients. However, securities transactions are governed by the rules established by Cetera. In addition, trading activity by Cameron is supervised by Trevor M. Cole, CFP®.

Part 2B of Form ADV: *Brochure Supplement*

Trevor Michael Cole, CFP®

CTA Wealth Advisors, Inc.
290 E. Verdugo Avenue, Suite 205
Burbank, CA 91502
(818) 841-1746
(818) 841-1954 fax
www.ctawealthadvisors.com

May 1, 2020

This brochure supplement provides information about Trevor M. Cole, CFP® that supplements the CTA Wealth Advisors, Inc. brochure (Part 2A of Form ADV). You should have received a copy of the CTA Wealth Advisors, Inc. brochure. Please contact us at: (818) 841-1746, or by email at: info@cameronthornton.com if you did not receive the CTA Wealth Advisors, Inc. brochure or if you have any questions about the contents of this supplement.

Additional information about the representatives listed above is available on the SEC's website at www.adviserinfo.sec.gov.

Educational Background and Business Experience

Trevor M. Cole, CFP® - Year of birth: 1973

Educational Background:

- California State University, Northridge, BS, Business Administration - Finance, 1998.

Business Experience:

- Mr. Cole is an Advisory Associate and Director of Compliance of CTA Wealth Advisors, Inc. Mr. Cole is a Registered Principal and Investment Advisory Supervisor of Cetera Advisor Networks LLC (Cetera), member FINRA/SIPC, a broker/dealer and SEC Registered Investment Advisor. Mr. Cole has been associated with Cetera since 2003. Mr. Cole began working with CTA Wealth Advisors, Inc. in 1996. He became a CERTIFIED FINANCIAL PLANNER™ in 2007.

Professional Certifications:

1. CERTIFIED FINANCIAL PLANNER™ (CFP®): Certified Financial Planners are licensed by the Certified Financial Planner Board of Standards, Inc. to use the CFP® mark.

   CFP® certification requirements:

   - Bachelor's degree (or higher) from an accredited college or university.
   - Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
   - Successful completion of the 10-hour CFP® Certification Exam.
   - Three-year full-time personal financial planning work experience.
   - Successfully pass the Candidate Fitness Standards and background check.
   - Continuing Education/Experience Requirements: 30 hours every two years.

Disciplinary Information

- Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. Mr. Cole does not have any history of disciplinary events.

Other Business Activities

- Trevor M. Cole, CFP® is separately licensed as a Registered Principal and Registered Representative of Cetera Advisor Networks LLC, an unaffiliated FINRA member broker-dealer. Mr. Cole in his separate capacity, can effect securities transactions for which he may receive separate, yet customary compensation. Mr. Cole currently maintains the following securities registrations[4]: Series 7, Series 24, Series 53, and Series 66.

  Mr. Cole also holds a state insurance license. As such, he is able to receive separate, yet customary commission compensation resulting from implementing product transactions on behalf of advisory clients.

  A form of "indirect compensation" may also be paid to Mr. Cole by sponsors of investment products, programs or services. This indirect compensation may include entertainment, attendance at events, attendance at educational conferences, reimbursements for approved business expenses, investment research, technology support and other resources that may assist with CTA's investment business.

  A conflict of interest exists between the interests of Mr. Cole and those of the advisory clients. This practice may give Mr. Cole an incentive to recommend investment products based on compensation received, rather than on the client's needs. Clients are under no obligation to purchase products recommended by Mr. Cole or to purchase products either through him or Cetera Advisor Networks LLC. The implementation of any or all recommendations is solely at the discretion of the client. CTA maintains a Code of Ethics requiring Mr. Cole to always act in your best interest and to reduce conflicts of interest.

- To stay up-to-date on the most current Other Business Activities, please refer to: http://brokercheck.finra.org.

[4] Series 7 – The General Securities Representative (Series 7) qualifies a holder for the solicitation, purchase, and/or sale of all securities products, including corporate securities, municipal securities, municipal fund securities, options, direct participation programs, investment company products, and variable contracts.

Series 24 – The General Securities Principal exam (Series 24) qualifies individuals as general securities principals who can manage or supervise the member's (Broker-Dealer firm's) investment banking or securities business for corporate securities, direct participation programs, and investment company products/variable contracts.

Series 53 – The Municipal Securities Principal (Series 53) tests a holder's knowledge of the rules and statutory provisions applicable to a municipal securities broker or dealer and to the supervision of the activities of municipal securities representatives. This exam also enables the principal to supervise municipal fund securities activities (i.e. selling 529 college savings plan or local government investment pools (LGIPS).

Series 66 – The Uniform Combined State Law (Series 66) qualifies holders as both securities agents and investment adviser representatives. The Series 7 is a corequisite exam that needs to be successfully completed in addition to the Series 66 exam before a holder can register with a state.

Additional Compensation

- Mr. Cole does not receive any additional compensation from third parties for providing investment advice to clients and does not compensate anyone for client referrals.

Supervision

- Trevor M. Cole, CFP® is supervised by Cameron M. Thornton, CFP®. He reviews Trevor's work through frequent office interactions as well as remote interactions. He also reviews Trevor's activities through our client relationship management system. Trevor M. Cole, CFP® is the Secretary of CTA Wealth Advisors, Inc.

  Cameron M. Thornton, CFP® contact information: (818) 841-1746 – cameron@ctawealthadvisors.com