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March 31, 2023

This Brochure provides information about the qualifications and business practices of BlueChip Wealth Advisors LLC (“BCWA”). If you have any questions about the contents of this Brochure, please contact us at (770) 771-5812. 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.

BlueChip Wealth Advisors is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. This Brochure is intended, in part, to provide information which can be used to make a determination to hire or retain an Adviser. Additional information about BlueChip Wealth Advisors is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

Since our last brochure dated March 2022, there have been material changes to our business.

Item 4—The Firm added new service offerings which can be reviewed further in Item 4 below.

A copy of BlueChip Wealth Advisor's ADV Part 2A is available by request without charge to you. Simply email our office at info@bcwealthadvisors.com or call us at 770-771-5812 and we will send you a copy. These documents are also available on our website for your review at www.bcwealthadvisors.com.

Additional information about BlueChip Wealth Advisors is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site provides information about any persons affiliated with BlueChip Wealth Advisors who are registered, or are required to be registered, as investment adviser representatives of BlueChip Wealth Advisors.

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Item 4 – Advisory Services Business

BlueChip Wealth Advisors, LLC (“BCWA”) BCWA was established in April 2007 and approved as a Registered Investment Adviser in August 2009. Marcus Ashworth owns 100% of BlueChip Wealth Advisors of BCWA.

Below is a description of the investment advisory and financial planning services offered by BCWA, including, but not limited to, BCWA’s fee schedules, a description of how fees are charged, whether fees are negotiable, when compensation is payable, refund policies and other applicable information. For more detail on any product or service please reference your advisory agreement, wrap brochure (if applicable) or BCWA Investment Advisory Representative (“IAR”).

For its investment advisory clients, the firm presently offers the following types of advisory services:

I. BCWA Advisor Managed Accounts

- a. TD Ameritrade Platform (TDA)
- b. Charles Schwab & Co. (Schwab)
- c. SEI Private Trust Company (SEI)
- d. National Financial Services (NFS)

II. BCWA Third Party Managed Fee Accounts

- a. Charles Schwab & Co. (Schwab)
- b. SEI Private Trust Company (SEI)

III. Wrap Account

- a. National Financial Services (NFS)
- b. SEI Private Trust Company (SEI)

IV. Financial Planning

V. Other Services

Below are descriptions of the accounts or services that BCWA offers, the basic management fee structures and any unique characteristics. For a more complete discussion and disclosure regarding any Account’s services or fee structure, BCWA will provide the client a detailed advisory agreement and/or the third-party investment manager’s ADV Part 2A and wrap fee brochure, as applicable.

Portfolio Management—Advisor Managed Programs

Advisor Managed Accounts are based on the individual objectives of each client portfolio and may or may not represent the overall objectives of the clients’ total investments. BCWA recommends and employs various investment strategies. BCWA Advisor Managed accounts are designed to provide discretionary

management by an Advisor of the firm. BCWA assists each client in formulating investment objectives and manages the account within established guidelines regarding, among other matters, diversification and designation of securities that may be purchased. As part of this service, each client portfolio is tailored to their particular investment needs and circumstances. The available risk strategies correlate to asset allocation models developed by BCWA based on target allocations for various asset classes and sub-classes.

The Advisor-Managed Accounts give our IARs the ability to customize asset allocation, investment selection, and investment strategies to meet each client's individual financial situation and investment objectives. Accounts are periodically rebalanced toward their asset allocation target or reallocated based upon changes to the client's risk tolerance or investment committee monitoring.

Portfolio Management accounts may be custodied at TD Ameritrade Inc. ("TD Ameritrade"), SEI Private Trust Company, or Charles Schwab & Co. ("Schwab") For these accounts, each portfolio is tailored to a client's particular investment needs and circumstances. This includes discretionary investment management in accounts based on the client's investment needs and a risk strategy (from conservative to aggressive), which is selected in conjunction with the client and incorporated into the account agreement. Depending on the client's investment objectives, the advisor may manage and provide advice on mutual funds, stocks, bonds, exchange traded funds (ETFs), LPs, and options. Alternative investments may be recommended to qualified investors based on the client's objectives and risk tolerance. Alternative investments could include real estate, Private Equity, Hedge Funds, Commodities, etc. Alternative Investments can provide diversification benefits to traditional portfolios of stocks and bonds.

Wrap Fee Programs

Our Firm offers three different type of wrap fee programs which are custodied at National Financial Services ("NFS") and SEI Investment Company ("SEI"). AT SEI we offer two different accounts in which one is the SEI Managed Account Solutions Independent Advisor Solutions (IAS) and the SEI Managed Account Solutions (MAS)--SEI Private Wealth Management. The third wrap fee program, the Peak account, is custodied at NFS.

The IAS Wrap Fee account is an account where the Client appoints their Independent Advisor as their investment advisor to assist the Client in selecting an appropriate investment strategy for their portfolio. The Client appoints SIMC, ("SEI Investments Management Corporation) to manage the assets in each portfolio in accordance with the strategy recommended by their Advisor and selected by the Client.

The IAS account consists of three distinct investment programs administered by SIMC, each program encompassing various investment strategies available for use investment advisors. The three programs available under IAS are: (1) the "Individual Manager Strategies" which are individual investment strategies (or model investment portfolios) constructed by third party investment managers selected and overseen by SIMC ("Portfolio Managers") or, in certain cases, constructed and directly managed by SIMC, covering a broad spectrum of investment styles; (2) the "Manager

Strategies Solutions,” consisting of SIMC, designed and managed model portfolios allocated to multiple Individual Manager Strategies (e.g., the coordinated use of multiple Individual Manager Strategies in one investment account); and (3) the “Models-Based Strategies” consisting of investment strategy models managed directly by SIMC, comprised of either SIMC’s proprietary family of mutual funds (“SEI Funds”), exchange traded funds (“ETFs”) selected by SIMC,, or families of third-party mutual funds or ETFs managed by well-established fund/ETF sponsors working with IAS to promote and distribute IAS solutions. IAS, and the three programs available within IAS, are further described in the Account Application that the Client and their Independent Advisor complete to invest in the noted program. Please refer to the Appendix 1 Wrap Fee Brochure from SEI Investments Management Corporation for more information about the programs available.

Under MAS, SIMC Clients may select SIMC to manage individual portfolios of stocks and bonds within specific investment strategy categories. However, SIMC generally hires third-party sub-advisors to manage these specific investment strategies either directly or through the sub-advisor providing SIMC with its investment model portfolio with SIMC then implementing the sub-advisor’s investment model. Under this program, SIMC makes available two broad categories of investment strategies that are referred to throughout their wrap fee brochure as “SIMC Managed Account Strategies”: (i) individual investment strategies (or model investment portfolios) of third party investment managers selected and overseen by SIMC (“Portfolio Managers”) covering a broad spectrum of investment styles; and (ii) SIMC designed and managed investment strategies (or model investment portfolios), including strategies that allocate to various Portfolio Managers, or strategies managed directly by SIMC comprised of SEI Funds, exchanged traded funds or third-party funds. Please refer to the Appendix 1 Wrap Fee Brochure from SEI Investments Management Corporation for more information about the programs available.

Our third wrap fee program is called Peak which is a wrap account. The non-wrap account is called the Crest account. In a Peak account, the client pays a single fee that covers the advisory services and the execution of transactions through NFS. Clients that anticipate trading primarily in equities and ETFs are typically recommended to open a wrap fee account; clients that anticipate trading in mutual funds with little or no anticipated trading in equities and ETFs will be recommended to open a non-wrap fee account. Please refer to the Appendix 1 Wrap Fee Brochure from Arkadios Wealth Advisors for more information about the program.

In a Crest account, clients pay an advisory fee plus additional transaction- based charges (see Item 5 for more information on fees). Several other factors influence the selection of the account structure, including but not limited to the account size; anticipated trading frequency; anticipated types of securities to be traded; and long-term investment goals.

Third Party Managed Accounts

Third Party Managers are evaluated by the BCWA Investment Committee for client use. The service includes assisting clients in identifying their investment objectives and matching personal and financial data with a list of investment managers that meets the BCWA Investment Committee’s

minimum quantitative and qualitative criteria. The intent of the program is to provide a select list of quality and recognizable investment management firms from which one or more managers are selected to handle the day-to-day management of the client's account(s). Third party managed accounts may utilize ETF, Mutual Fund, SMA, Equities, Bonds, Alternatives, and other types of investments.

Among the criteria that may be considered for inclusion in the program are the manager's experience, assets under management, performance record, client retention, the level of client services provided, investment style, buy and sell disciplines, capitalization level, expenses, and the general investment process.

When recommending outside investment managers, the firm first analyzes the client's investment objectives, risk tolerance and existing portfolio, if applicable, to determine the investment style that will best facilitate the desired diversification and tax situation of the portfolio. The firm then identifies strategies or managers who exhibit the desired investment attributes. The firm helps the client measure the performance of the managers by making comparisons to appropriate benchmarks. Depending on client objectives, the firm advocates an active/passive investment strategy using a diversified approach.

The firm may at any time terminate the relationship with a third-party manager that manages clients' assets. Factors involved in the termination of an advisor may include a failure to adhere to management style or clients' objectives, a material change in the professional staff of the advisor, unexplained poor performance, dispersions of client account performance, or the firm's decision to no longer include the advisor as one of its preferred program managers.

Clients are advised and should understand that:

- A manager's past performance is no guarantee of future results. There is a certain market and/or interest rate risk which may adversely affect any advisor's objectives and strategies and could cause a loss in a client's account(s); and Client risk parameters or comparative index selections provided to the firm are guidelines only - there is no guarantee that they will be met or not be exceeded.
- Accounts in the BCWA program are managed by the selected independent manager. Information collected by BCWA regarding selected managers is believed to be reliable and accurate, but the firm does not independently verify it on all occasions. All performance reporting will be the responsibility of the respective manager and is provided directly to the clients and the firm. The firm does not audit nor verify that these results are calculated on a uniform or consistent basis as provided by a manager directly to the firm or through the consulting service utilized by the manager or the firm.
- The minimum account size will vary from manager to manager. All such minimums will be disclosed in the respective manager's ADV document. The firm may have the ability to negotiate such minimums. Third Party Managed accounts are custodied at Schwab and SEI.

Financial Planning

BCWA offers advice in the form of a Financial Plan. The Firm may provide either financial consulting or a comprehensive financial plan tailored to meet the client's needs and financial objectives as described by the client. During meetings with the client, the investment philosophy, risk tolerance, investment objectives, financial position, insurance needs, tax objectives, trust and estate issues are discussed.

Clients will receive a written plan, providing the client with a detailed financial plan designed to achieve their stated financial goals and objectives. Our Firm offers three different types of financial plans or financial consulting to best fit our client needs. These financial plans are further described below:

The BlueChip Standard

The BlueChip Standard is our Firm's premier asset management service. Clients will receive highly personalized service from an Advisor that will review and manage all aspects of your investments. You can expect an efficient experience based on a holistic wealth management offering supported by new research findings and best-in-class technology. Your Advisor will provide a full overview of included services during your discovery meeting. This service is only for Clients who also have an advisory account with BCWA which is included in their advisory fee. An eMoney subscription is also automatically included with the advisory fee under this plan.

The BlueChip Retirement Plan includes a Net Worth Statement, Asset Allocation Analysis (current versus proposed), Monte Carlo Analysis Study, Holdings Detail Report, Efficient Frontier Study on Current Portfolio, Projected Asset Calculation, Holdings Gain/Loss Report, Projected Income during retirement calculation, Recommended Asset Allocation Report, and Abbreviated Income/Expense Projection. Other reports available at request. The Reports and an Explanation of Results will be presented and reviewed during a final meeting that typically lasts 2 – 3 hours. If the Client elects to enroll in an eMoney monthly subscription, the eMoney Account Set-up, Implementation, and 1 hour Tutorial is complimentary.

The BlueChip Comprehensive Retirement Plan includes everything in the BlueChip Retirement Plan plus an additional in-depth Cash Flow Analysis, Social Security Analysis & Income Calculation on when to begin, Projected Retirement Income Modeling, Analysis of current 401k plans, pensions, and other retirement plans and projected incomes, Estimate of Inflation and the impact it might have on income during retirement. A Comprehensive Insurance Analysis is available upon request.

The Firm encourages clients to use the services of an estate attorney and does not render legal advice. The Firm also will not advise the client or act for the client in any legal proceedings, including bankruptcies, involving securities held or previously held, or the issuers of those securities. The Firm will not vote proxies for securities held in client accounts.

If the client requests BCWA to provide investment management services with respect to the Excluded Assets, the client may engage BCWA to do so for a separate and additional fee.

Other Services

The Firm offers other services in an effort to meet our client's needs. In the event a client wishes to have our assistance with a one-time financial plan or consulting, then we offer The BlueChip Project.

The BlueChip Project is a flexible service made available to both current and prospective Clients who may require Financial Planning, Retirement Planning, Estate Planning, Insurance Planning, College Planning, and/or Advisory Consulting services on an ad-hoc basis. Deliverables and a full scope of the project with estimated hours will be determined during an initial consult.

The BlueChip eMoney Account is available to individuals that do not otherwise engage BCWA for asset management services, financial / retirement planning, or advisory consulting services but desire an eMoney account. This plan includes eMoney account Set-up, Implementation, and a 1-hour Tutorial. This plan does not include financial / retirement planning or advisory consulting services. eMoney is a service that provides comprehensive reporting services which can incorporate all of the client's investment assets, including those investment assets that are not part of the assets managed by BCWA (the "Excluded Assets"). Should the client utilize these reporting services, the Client acknowledges and understands that with respect to the Excluded Assets, BCWA's service is limited to reporting and data storage services only and does not include investment management, review, or monitoring services, nor investment recommendations or advice. As such, BCWA will not be responsible for the investment performance of the Excluded Assets

As of December 31, 2022, BCWA, held \$297,297,744 in assets under management on a discretionary basis.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by BCWA is established in a client's written agreement. BCWA's Portfolio Management Fees and those of a Third-Party Manager (where applicable) are based on the assets in the account per the fee schedule, or in some instances using a flat fee. Either way, fees may be negotiated. Financial Planning and Consulting Fees are based on an hourly rate or flat project fee based upon the specifics of the project.

BCWA provides investment management services for an annual fee based upon a percentage of the market value of the assets in each client account. The advisory fee is negotiable depending on the representative providing the management services, the market value of the account, asset types, complexity of your portfolio, services desired, your financial situation, and level of trading activity. It is important to note that it is possible that different investment advisor representatives may charge different fees for providing the same types and level of service to clients. The annual fee is divided and paid quarterly in advance (NFS, Schwab) or arrears (TDA, SEI) through a direct debit of your account. The account fee includes an annual review as described in Item 13.

BCWA Advisor Managed accounts are custodied with TD Ameritrade, Inc. ("TDA"), SEI Private Trust Company, and Charles Schwab & Co. ("Schwab"). Our third party managed accounts are custodied at Schwab and SEI Trust Company. Our wrap fee programs are custodied at SEI Private Trust Company ("SEI"), and National Financial ("NFS"). Fees will be charged differently depending on the platform selected. Fees

below are based on the value of each client's account, and accounts are not aggregated by default in a household for billing purposes.

Below is the Firm's fee schedule which is used for all accounts offered by our Firm regardless of whether it is a wrap account, non-wrap account, or advisor managed account. Our standard asset-based management fee schedule is follows:

<u>Portfolio Value</u>	<u>BCWA Fee</u>
< \$999,999	1.75%
\$1,000,000 - \$2,999,999	1.5%
\$3,000,000 +	Negotiable

TDA PLATFORM

BCWA's fees are payable quarterly in arrears and automatically deducted from the account pursuant to the advisory agreement. Fees charged for our asset management services are charged based on a percentage of assets under management, billed in arrears (at the end of the billing period) on a quarterly calendar basis and calculated using the average daily balance of your account(s) during the current billing period. Certain third-party managers may calculate their fees based on quarter ending balances or some other method which will be disclosed in the applicable Firm's Form ADV, and advisory agreement provided to the client. Any fees due to BCWA from the client will be invoiced or deducted from the client's account prior to termination.

SEI PRIVATE TRUST COMPANY

BCWA's fees are payable quarterly in arrears and automatically deducted from the account pursuant to the advisory agreement. All quarterly fees will be charged in the current quarter for the prior quarter based on the prior quarter's ending balance. Certain third-party managers may calculate their fees based on quarter ending balances or some other method which will be disclosed in the applicable the Firm's Form ADV, and advisory agreement provided to the client. Any fees due to BCWA from the client will be invoiced or deducted from the client's account prior to termination.

SCHWAB PLATFORM

Portfolio management fees are generally payable quarterly, in advance. If management begins after the start of a quarter, fees will be prorated accordingly. Fees are normally debited directly from client account(s) unless other arrangements are made.

Either BCWA or the client may terminate their Investment Management Agreement at any time, subject to any written notice requirements in the agreement. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed.

SCHWAB PLATFORM-THIRD PARTY MANAGED

BCWA's fees and those of a third-party manager are payable quarterly in advance and automatically

deducted from the account pursuant to the advisory agreement. All quarterly fees will be charged in the current quarter for the prior quarter based on the prior quarter's ending balance. Certain third-party managers may calculate their fees based on quarter ending balances or some other method which will be disclosed in the applicable Form ADV, and advisory agreement provided to the client. In the event of termination, any paid but unearned fees will be promptly refunded to the client based on the number of days that the account was managed.

ADVISORY MANAGED ACCOUNT SOLUTIONS – CREST AND PEAK ACCOUNTS

Fees are based on a percentage of assets under management and calculated at an annual rate and billed in advance on a monthly basis. The initial fee is due in full one business day after the client's account is accepted and opened with the minimum account balance of \$500,000 and will be based on the asset value of the account on that date. The initial fee will be prorated according to the number of days remaining in the calendar month. Thereafter, the fee will be calculated by multiplying the fair market value of the assets in the account as of the last trading day of each calendar month by the annual fee and then dividing that result by 12, which represents each month. The account value is calculated as the market value of all long and short securities positions in the account and will not be reduced by any margin or other indebtedness of the client with respect to such securities or other investments. Fees will not be adjusted or pro-rated for additions to or withdrawals from the account during the calendar month, other than a complete withdrawal in connection with a termination of the Account Agreement.

Crest account Clients will be charged a *minimum* fee of \$10.42 monthly, this fee is not in addition to the asset-based fee schedule but the minimum that a client will be charged.

Fees are automatically deducted from the account pursuant to the advisory agreement and are not billed separately to clients. Clients must maintain or deposit sufficient funds in the account to cover payment of all fees authorized by the contract. If there are not funds to cover the fees, then BCWA can liquidate assets to cover fees. The amount of the fee will be shown on the statement received by the Custodian. BCWA urges clients to carefully review such statements.

Upon termination of an account, any prepaid, asset-based fees will be prorated according to the days the account was opened during the calendar month and excess fees will be re-bated to the client. All custodial termination and transfer fees assessed by NFS, if any, will be the responsibility of the client.

In addition to the advisory fee, accounts will be assessed transaction fees for trades other than mutual fund trades, such as equities, ETFs, or bonds. Mutual fund transaction fees will not be charged to the client. However, Arkadios Capital, as Introducing Broker, reserves the right to charge transaction fees to BCWA if the number of mutual fund transactions is deemed to be excessive. If this occurs, such fees will be paid by BCWA and not passed on to the client. Transaction fees charged may be higher or lower than transaction charges or commissions charged by other broker-dealers. When appropriate, the Advisor will recommend the purchase or sale of non-mutual fund securities and the client will pay a transaction fee for those trades. Arkadios Capital and the custodian each receive a portion of the transaction fees paid by clients. Although transaction charges may be identified as commissions on trade confirmations, the Investment Adviser Representative does not

receive any portion of these charges. The Advisory Managed Account Solutions account is also offered in a wrap fee program ("Peak"). The Peak account is more fully described in the Peak Wrap Fee Program Brochure.

ACCOUNT TERMINATION

If the ADV disclosure document was not delivered to the client at least 48 hours prior to the client entering into any written or oral advisory contract with this investment adviser, then the client has the right to terminate the contract without penalty within five business days after entering into the contract. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract, or in the case of an oral contract otherwise signified their acceptance, any other provisions of this contract notwithstanding.

Fees will be prorated based on the number of days the Account is under BCWA's management for any Agreement that comes into effect or is terminated during a quarter. In addition to BCWA's management fee, clients with SMA'S and/or Third-Party Managed Accounts will also bear other charges imposed by the custodian of their account or by other third parties relating to their account or transactions effected in the account. Such charges may include, but not be limited to, brokerage commissions, ticket charges, wire transfer charges, custodial fees, activity fees, termination fees, postage and handling fees and other transaction or account related fees and charges. Upon written receipt of notice to terminate its Client Agreement and unless specific transfer instructions are received, BCWA and its agent will, in an orderly and efficient manner, proceed with liquidation of the client's account. There will not be a charge by us for such redemption; however, the client should be aware that certain mutual funds impose redemption fees as stated in each company's fund prospectus in certain circumstances.

Crest accounts custodied through NFS will be charged an early termination fee to cover the administrative costs of establishing the account if the account is terminated within the first year of service. The fee termination fee will be a maximum of \$125 and will be prorated based on the time the account was open in the first year of service. If the account is closed within the first month (but after five business days) after the account is established, the client will be charged \$125. If the account is closed after six months, the client will be charged half that fee (\$62.50). If the account is closed after 11 months, the client will be charged \$10.42. A termination fee will not be charged if this is an ERISA account or no services were rendered, no trades were placed, or if the account is terminated within the first five business days of service. For the purposes of this provision, a contract is considered entered into when all parties to the contract have signed the contract.

Client and/or the firm may initiate termination of the contract at any time by sending written notice to the contra party and will deemed to be accepted the day that it is received by the contra party. Upon written receipt of notice to terminate its client agreement and unless specific transfer instructions are received, BCWA and its agent will cease advisory services. Should the client provide specific instructions to liquidate, BCWA will proceed with liquidation of the client's account in an orderly and efficient manner.

Factors that could affect the orderly and efficient manner would be size and types of issues, liquidity of

the markets, and market makers' abilities. Should the necessary securities' markets be unavailable, and trading suspended, efforts to trade will be done as soon as possible following their reopening. Due to the administrative processing time needed to terminate client's investment advisory service and communicate the instructions to client's Investment Advisor, termination orders received from clients are not market orders; it may take several business days under normal market conditions to process the client's request. During this time, the client's account is subject to market risk. BCWA and its agent are not responsible for market fluctuations of the client's account from time of written notice until complete liquidation. All efforts will be made to process the termination in an efficient and timely manner.

FINANCIAL PLANNING FEES

The BlueChip Standard | Asset Management Services

Financial Planning for Clients in the BlueChip Standard plan is included as part of the annual advisory fee that is paid to their Advisor. The eMoney subscription is also included with the advisory fee under this plan. This plan includes 5 hours for assets under management of \$1-3MM, 10 hours for \$3-5MM, and for \$5MM and over, the hours are unlimited. The Firm reserves the right to charge an additional \$300 per hour for a Certified Financial Planner or \$75.00 per hour for a Paraplanner for services beyond the scope of the selected plan.

The BlueChip Retirement Plan

The Firm charges a \$1,750 flat fee for the financial plan, which includes 5 hours, and a \$29 monthly subscription to eMoney. The subscription to eMoney includes Account Set-up, Implementation, & 1 hour tutorial. The Firm reserves the right to charge an additional \$300 per hour for Certified Financial Planner or 75.00 per hour for a Paraplanner for services beyond the scope of the selected plan.

The BlueChip Comprehensive Retirement Plan

The Firm charges a \$3,500 flat fee for the financial plan, which includes 10 hours, and a \$29 monthly subscription to eMoney. The subscription to eMoney includes Account Set-up, Implementation, & 1 hour tutorial. The Firm reserves the right to charge an additional \$300 per hour for a Certified Financial Planner or \$75.00 per hour for a Paraplanner for services beyond the scope of the selected plan.

Termination

Either party may terminate the agreement for financial planning services upon written notification to the other party at any time and will be refunded a portion of the fee based upon a pro-rated calculation related to the time and expense expended by the firm.

Project Based Fees

The BlueChip Project

The Firm charges an hourly rate which can vary depending on the scope and complexity of the ad-hoc deliverable. Once the scope of the project is determined, if the scope changes, the Firm reserves the right to charge an additional \$300 per hour for a Certified Financial Planner or \$75.00 per hour for a Paraplanner for services beyond the scope of the selected plan.

The BlueChip eMoney Account

The Firm charges a \$1,000 flat fee and a monthly subscription in the amount of \$49. The Firm includes the eMoney account setup, implementation, and a 1-hour tutorial in the flat fee.

All flat fees are charged up-front at the time of the engagement and the Client will receive an invoice from BCWA. Payment made me made directly to BCWA by personal or business cards. No credit card is accepted. For all monthly subscriptions, BCWA will submit an invoice to the Client in which the full and final payment must be paid to BCWA no later than 15 days following receipt of the BCWA invoice. Payments made be made by personal check or business check, no credit cards are accepted.

Other Fees

Clients can purchase securities through broker-dealers in initial public offerings, secondary offerings, and special purpose acquisition company transactions. If Arkadios Capital acts as a member of the selling syndicate for such offerings, the firm will receive compensation equal to a portion of the gross spread (the difference between the price the client pays for the security and the price at which it purchased the securities). The amount of the gross spread is described in the relevant prospectus, offering circular or official statement. Most BCWA investment advisor representatives are also registered broker-dealer representatives of Arkadios Capital. Arkadios Capital may share a portion of payments received in connection with an initial public offering, a secondary offering, and/or a private placement with these Advisors. The advisory fee is not reduced to offset this compensation. Thus, Advisors have an incentive to recommend purchases of sales in certain offerings because the Advisor will receive more compensation in connection with these securities than in connection with other types of securities. This creates a conflict of interest.

In addition to the advisory fees paid to BCWA, 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 brokerage commissions, 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, 12(b)- 1 fees), 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.

Some mutual funds within this program pay 12(b)-1 service fees (normally 0.25% per year) to the Custodian or third-party investment manager. The mutual funds the Firm could purchase or recommend offer a variety of share classes, including some that do not charge 12(b)-1 fees and are, therefore, less expensive. These fee arrangements will be disclosed upon request of a client and are available in the applicable fund 's prospectus.

Typically, BCWA does not recommend mutual funds that charge 12(b)-1 fees when other share classes are available. However, there are instances in which the BCWA would recommend a mutual fund that carries a 12(b)-1 fee, even when a lower-cost share class is available for the same fund. For example, a lower-cost class share may not be available to BCWA due to investment minimums. When recommending a particular mutual fund share classes, the different available share classes are compared and reviewed along with the anticipated investment timeframe, potential tax consequences, future anticipated transactions, and other costs to determine the best selection for the client at that time. BCWA does not receive any part of the fees charged by Mutual Funds.

When accounts are held through NFS, Arkadios Capital receives these 12(b)-1 fees. The receipt of such fees represents a conflict of interest in that there is an incentive for Advisors to recommend funds with 12(b)-1 fees over funds that have no fees or lower fees. To mitigate this conflict of interest, Arkadios Capital will review the receipt of 12(b)-1 fees it receives quarterly and rebate such fees to the client's account.

The advisory fee also does not cover debit balances or related margin interest or SEC fees or other fees or taxes required by law. In addition, certain Accounts may require a minimum advisory fee or quarterly maintenance fee that will be detailed in the applicable advisory agreement. In this case, the advisory fee charged may be more than the effective annual rate in the fee schedule above. In certain cases, the client may give BCWA's IAR or a third-party money manager discretionary authority to more actively manage the client's assets. This authority is disclosed in the applicable advisory agreement.

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

BCWA 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). Some third party and hedge fund managers may, however. Those fees, if applicable, are disclosed in their respective Disclosure Brochures.

Item 7 – Types of Clients

BCWA provides portfolio management services to individuals, corporations and business entities, government entities, pension and profit-sharing plans, charitable institutions, foundations, endowments, estates, and trusts. The minimum account size is specified in Item 4 and varies based on the account program selected. BCWA has the discretion to waive the account size minimum. For any third-party manager programs, account minimums may vary by manager and such information is

disclosed in the manager's respective Brochure (Form ADV).

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

Our investment strategy begins with an understanding of a client's financial goals. Advisors use demographic and financial information provided by the client to assess the client's risk profile and investment objectives in determining an appropriate plan for the client's assets. Investment strategies ordinarily include long- or short-term trading of stock portfolios, mutual funds and fixed income securities, option transactions and may include margin transactions. Investment recommendations are based on an analysis of the client's individual needs and are drawn from research and analysis. Security analysis methods may include fundamental analysis, technical analysis, charting and cyclical analysis. Information for this analysis may be drawn from financial newspapers and magazines, research materials prepared by others, annual reports, corporate filings, prospectuses, company press releases and corporate ratings services.

It is important to note that investing in securities involves certain risks that clients should be prepared to bear. Though the goal of the firm is to find quality investments and proper allocation strategies, there is no guarantee that the goal will be met, and/or that the value of investor portfolios may not decline in value during any given period. For any risks associated with Investment Company products, please refer to the prospectuses for additional details about these risks. Our investment approach constantly keeps the risk of loss in mind. These risks include, but are not limited to:

- **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 today will not buy as much as 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:** 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:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company 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.

Item 9 – 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 BCWA or the integrity of BCWA's management. BCWA has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Certain BCWA personnel are also registered representatives and/or insurance agents of Arkadios Capital, LLC ("Arkadios"), a registered broker-dealer and insurance agencies such as Highland Capital Brokerage or Ash Brokerage. BCWA is not affiliated with Arkadios Capital, Ash Brokerage, or Highland Capital Brokerage through ownership or control.

Individuals are separately licensed as insurance agents with Highland Capital Brokerage or Ash Brokerage. Highland Capital Brokerage and Ash Brokerage are registered insurance agencies engaging in Life, Health, Disability, Long Term Care, and non-variable Insurance business. Highland Capital Brokerage and Ash Brokerage are affiliated with Arkadios Capital. Compensation will be paid directly by these entities.

Individuals are separately licensed as Registered Representatives through Arkadios Capital. In this capacity, they may be paid commissions, brokerage fees, 12b-1 fees or other fees or payments for their brokerage clients, which may include clients who are also clients of BCWA. These arrangements pose a conflict of interest for those individuals to the extent they have a financial incentive to recommend such sales or other transactions to the client. In their capacities as registered representatives, clients will be charged separately from their advisory services.

All related compensation is separate from advisory services. If a trade error were to occur, it can result in profit or loss to the firm. The firm has controls in place to limit such trade errors. Investment Advisers will not participate in any profits resulting from such errors.

Clients may purchase securities through broker-dealers in initial public offerings, secondary offerings, and special purpose acquisition company transactions. If Arkadios Capital acts as a member of the selling syndicate for such offerings, Arkadios Capital will receive compensation equal to a portion of

the gross spread (the difference between the price the client pays for the security and the price at which it purchased the securities). The amount of the gross spread is described in the relevant prospectus, offering circular or official statement. Advisors, acting as a Registered Representative of Arkadios Capital, receive compensation from the sale of an initial public offering (IPO). The advisory fee is not reduced to offset this compensation. This poses a conflict of interest for those individuals as they have a financial incentive to recommend IPO purchases. However, BCWA and its personnel are constrained by fiduciary principles to act in the client's best interest and will only recommend IPO's when they are believed to be suitable.

Clients are under no obligation to purchase any recommended brokerage products or insurance products. On average individual Investment Advisor Representatives and the principals of BCWA spend 30% of their time on other such activities. BCWA may require that clients establish brokerage accounts with National Financial Services, LLC ("NFS"), a Fidelity Investments company, Charles Schwab & Co. ("Schwab"), TD Ameritrade, or SEI Private Trust Company to maintain custody of clients' assets and to effect trades for their accounts. BCWA is independently owned and operated and not affiliated with either NFS, a Fidelity Investments company, Charles Schwab & Co., SEI Private Trust Company, or TD Ameritrade. Item 12 includes additional details regarding brokerage practices and related disclosures.

Item 11 – Code of Ethics

BCWA has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at BCWA must acknowledge the terms of the Code of Ethics annually, or as amended.

BCWA's employees and persons associated with BCWA are required to follow the Code of Ethics. The Code of Ethics is designed to assure that the personal securities transactions, activities, and interests of the employees of BCWA 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. Under the Code certain classes of securities, such as mutual funds and UITs have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of BCWA's clients. In addition, the Code requires pre-approval of many transactions, and restricts trading in close proximity to client trading activity. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between BCWA and its clients. BCWA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting us at our main number.

Advisors may buy or sell securities, at or around the same time as those securities are

recommended to clients. This practice creates a conflict of interest in that BCWA, or its Representatives are in a position to benefit from the sale or purchase of those securities. BCWA's Code of Ethics provides a policy to monitor the personal trading activities and securities holdings of each of the Firm's Representatives or other Access Persons. The Code of Ethics' personal trading policies include procedures for limitations on personal securities transactions of associated persons, reporting and review of such trading. These policies are designed to discourage and prohibit personal trading that would disadvantage clients.

Trades may be done on an aggregated basis when consistent with BCWA's obligation of best execution. In such circumstances, the Advisor (or related account) and client accounts will share commission costs equally and receive securities at a total average price. BCWA will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the order.

BCWA's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the Compliance Department at the main number.

Item 12 – Brokerage Practices

We recommend the brokerage and custodial services of TD Ameritrade, Inc. ("TD Ameritrade"), SEI Private Trust Co. ("SEI"), Charles Schwab & Co. ("Schwab"), or National Financial Services LLC ("NFS"), a Fidelity Investments company. TD Ameritrade, SEI, Schwab, and NFS are a registered broker-dealer that charges brokerage commissions or transaction fees for effecting securities transactions. As the custodian holding an account, TD Ameritrade, SEI, Schwab, and NFS do not generally charge separately for custody services. They are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed, which are included when wrap fees are charged.

The Custodians make products and services available to BCWA that benefit BCWA but may not directly benefit its clients' accounts. Many of these products and services are used to service all or a substantial number of BCWA accounts. Some of these products and services provided includes software and other technology that (i) provides access to client account data (such as trade confirmations and account statements); (ii) facilitates trade execution and allocates aggregated trade orders for multiple client accounts; (iii) provides research, pricing and other market data; (iv) facilitates payment of BCWA fees from its clients' accounts; and (v) assists with back-office functions, recordkeeping and client reporting.

When client brokerage commissions are used to obtain research or other products or services, BCWA receives a benefit because we do not have to produce or pay for the research, products, or services. As a result of these services provided, commissions may be higher than those charged by other broker-dealers. Soft dollar benefits are used to service all client accounts; they

are not used exclusively for the accounts that generated the soft dollar benefits. There is no effort to allocate soft dollar benefits to clients in proportion to the amount of soft dollar benefits generated by each client.

Factors for such recommendation would be when transaction compensation is seen as a benefit to the client. For broker-dealer services, the Adviser or its associated persons may receive compensation for such transactions, where such compensation is separate and distinct from Adviser's compensation related to its investment advisory services. Commissions paid to advisers for broker-dealer services may be higher or lower than those paid by other brokers. There may be situations where an Advisor is also a Series 7 Registered Representative with Arkadios Capital may be entitled to certain trailers or fees paid by a third-party product provider. Transactions are done solely as a Registered Representative and are not in the capacity as an Investment Advisor. This includes situations where commissions are paid rather than advisory fees, including private placements and insurance products. Arkadios Capital requires brokerage accounts to be opened through NFS or directly with the issuer.

Item 13 – Review of Accounts

Accounts are assigned to investment advisors who are responsible for performing periodic reviews of the account and consult with the respective client of the account. Following these reviews, service reports are prepared to assist principals in supervising and monitoring the account. Factors that are considered include but are not limited to the following: investment objectives, targeted allocation, current allocation, suitability, performance, number of trades, monthly distributions, concentrated positions, diversification, and outside holdings. BCWA audits client fee billing on a quarterly basis.

Client agrees to inform the firm in writing of any material changes to the information included in the questionnaire or any other change in the client's financial circumstances that might affect the manner in which client's assets should be invested. Client may contact the firm during normal business hours to consult with the firm concerning the management of the client's account(s). Clients may elect to receive performance reports and aggregated account reports as indicated in their advisory contract.

Item 14 – Client Referrals and Other Compensation

BCWA does not receive any compensation or economic benefit for providing investment advice from anyone other than our advisory clients. BCWA does not compensate non-advisory persons for client referrals.

Item 15 – Custody

Clients should receive statements at least quarterly from NFS, Schwab, TD Ameritrade, or SEI, the qualified custodian that hold and maintain your investment assets. BCWA urges you to carefully review such statements and compare the official custodial records to the account statements that

we may provide you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

BCWA receives discretionary authority in writing as part of the investment advisory agreement. BCWA has authority to supervise and direct on an ongoing basis the investments of the client in accordance with the client's predetermined investment objectives and guidelines or the client's written Investment Policy Statement. BCWA is authorized, in its discretion and without prior consultation with the client to: (1) buy, sell, exchange and otherwise trade any stocks, bonds,

SMAs or other securities or assets, and (2) determine the number of securities to be bought or sold. Any limitations to such authority will be communicated by the client to BCWA in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, BCWA does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for all securities maintained in client portfolios. BCWA may provide advice to clients regarding the clients' voting of proxies. Clients will receive their proxies or other solicitations directly from their custodian or transfer agent.

Item 18 – Financial Information

Registered Investment Advisers are required to provide clients with certain financial information or disclosures about BCWA's financial condition. BCWA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of any bankruptcy proceeding.

Privacy Policy

BlueChip Wealth Advisors LLC (“we” or “us” or “our”) collects nonpublic personal information about you from the following sources: Information we receive on applications, questionnaires, web site, or other forms and information about your transactions with our affiliates, others, or us.

To Whom This Policy Applies

This notice applies to all our clients who enter into an advisory services agreement with us. Even if you are no longer a client, our privacy policy will continue to apply to you.

Nonpublic information

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

Sources of Personal Information

We collect personal information about you from meetings with you and on applications or other forms you have submitted to BCWA, as well as information about your investments or transactions with us or others (such as third-party service providers or fund companies) from other sources.

Opt-Out Provision

Since BCWA does not sell or share any personal information an “opt out” provision would not be applicable to this privacy policy. Clients may call (770) 771-5812 to request further information regarding this policy.

If you have any questions concerning our privacy policy, please call us at (770) 771-5812 or email info@bcwealthadvisors.com.