Customer Relationship Summary

Form ADV Part 3

CreativeOne Securities is registered with the Securities and Exchange Commission as both a broker-dealer and investment adviser. Investment advisors and broker-dealers offer different services under differing compensation structures and it is important for retail investors like you to understand how they differ. Educational materials about broker-dealers, investment advisors, and investing in general are available, along with free and simple tools to help research firms and their financial professionals, at https://www.investor.gov/CRS.

What investment services and advice can you provide me?

We offer brokerage and investment advisory services to retail investors like you. When we act as your broker-dealer, we provide transactional services such as executing securities transactions. When we act as your investment advisor, we provide services such as ongoing *Investment Management Services*, including wrap accounts, and *Financial Planning and Consulting Services*.

Broker-Dealer Services

The brokerage services we offer include buying and selling securities at your direction and providing you with investment recommendations, research, financial tools, and investor education. We offer mutual funds, exchange traded funds (ETFs), domestic and international equities, options, fixed income securities, certificates of deposit (CDs), structured notes, and variable annuities and do not impose any account minimums or other requirements to open an account.

Depending on the level of involvement you desire, our financial professionals are available to meet with you to help you establish longterm goals. No matter how involved we are, our brokerage services are generally provided at your request and you will make the ultimate decision regarding the purchase or sale of investments in your account.

Investment Advisory Services

The principal investment advisory services we offer to retail clients are financial planning services, investment management services (with an option to participate in wrap fee programs), third-party asset management services, and custom advisory services designed to meet your unique needs.

Our investment advisory services generally begin with a meeting between you and one of our financial professionals to discuss your investment goals, risk tolerance, and liquidity needs. Based on this meeting, we work with you to develop a plan to help you achieve your financial goals in a manner that suits you.

	Broker-Dealer Services	Investment Advisory Services	
		Investment Management	Financial Planning/Consulting
Monitoring	Broker-dealer services are generally transactional in nature and do not generally include ongoing monitoring of your accounts. You will, however, receive account statements at least quarterly reflecting all activity in your account. We will deliver account statements to you each quarter in paper or electronically.	Our financial professionals will continually monitor and provide ongoing recommendations regarding your account. We will meet with you at least annually to discuss your progress toward your investment goals and update your financial profile to reflect any changes in your personal or professional life.	Unless your financial planning agreement with us contemplates ongoing services, our Financial Planning and Consulting Services generally do not include ongoing advice or updates to previously-made plans or recommendations.
	Additional information regarding our monitoring of client accounts can be found in our ***Regulation Best Interest Disclosure*** and ***Item 13*** Form ADV Part 2A Disclosure Brochure		
Investment Authority	Although our financial professionals may recommend specific investments from time to time, you make the final decision with respect to all investment decisions.	You can choose an account that allows us to buy and sell investments in your account without asking you in advance (a discretionary account) or we may provide advice or recommendations to you with you making the decision as what investments to buy and sell (a non-discretionary account).	These services are generally provided on a non-discretionary basis and it will be up to you as to whether and how to implement your financial plan.
	Additional information on discretionary authority can be found under ***Item 16*** of our Form ADV Part 2A Disclosure Brochure and ***Item 5*** of our Form ADV Part 2A Appendix 1 (Wrap Brochure).		

creativeOne SECURITIES

Customer Relationship Summary

Limitations/ Account Minimums/ Other Requirements	Our financial professionals may only offer products that we have reviewed and approved for sale. This doesn't mean that every product available for our financial professionals to offer is suitable for you. Other broker-dealers may offer a wider range of options, some of which might have lower costs.	We generally require a minimum account size of $25,000 to establish a relationship, but certain investment programs we offer have higher minimum account size requirements.	A minimum fee of $300 applies to all financial planning and consulting services.

Additional information about applicable minimum account size requirements can be found in our *Regulation Best Interest Disclosure* or under *Item 7* of our Form ADV Part 2A Disclosure Brochure or *Item 5* of our Form ADV Part 2A Appendix 1 (Wrap Brochure).

Conversation Starters

- Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?

Additional information about the services we offer can be found in our *Regulation Best Interest Disclosure* and under *Item 4* of our Form ADV Part 2A Disclosure Brochure and *Item 4* of our Form ADV Part 2A Appendix 1 (Wrap Brochure).

What fees will I pay?

	Broker-Dealer Services	InvestmentAdvisory Services	
		Investment Management	Financial Planning/Consulting
Fees & Costs	❖ You pay transaction-based fees for each trade you make. Commissions vary depending on transaction size, type of investment, and whether the order is a buy, sell or exchange. ❖ We also receive on-going compensation in the form of 12b-1 fees for certain investment products (such as mutual funds and annuities) based on the amount invested and how long the investment is held. ❖ With stocks, exchange-traded funds and options trades, the transactionbased fee is charged separately from investment cost. For investments in bonds this fee is part of the price you pay for the security (a mark-up or markdown).	Our investment management services, including third-party money managers, are generally priced based on the value of your investment portfolio. Because our fee is based on the amount of assets we manage, the more assets a retail client places under our management, the more they will pay in fees. Therefore, we have an incentive to encourage retail clients to increase the amount of assets in their accounts. Our investment advisory fees are generally negotiable and can vary based on factors such as the expected complexity of strategies to be pursued, the type of account to be managed, and the types of securities available to recommend or purchase.	We offer financial planning and consulting services on an hourly or flat-fee basis. A minimum fee of $300 applies to all financial planning and consulting services.

Additional information regarding our fees and costs can be found under *Item 5* of our Form ADV Part 2A Disclosure Brochure and *Item 4* of our Form ADV Part 2A Appendix 1 (Wrap Brochure).

Other Fees and Costs

In addition to the fee you pay us for the services we provide, you are also responsible for other fees and costs incurred in connection with the management of your account and when implementing transactions recommended under a financial planning or consulting relationship, such as, for example, transaction costs and brokerage or custodial fees. Certain investment products, such as mutual funds and exchange-traded funds, charge ongoing fees to cover their internal operating costs, including portfolio management fees, legal and accounting services, and marketing expenses.

Under our wrap program, the asset-based fee you pay covers both the investment management services and most transaction costs and fees and therefore is generally higher than a typical asset-based advisory fee. In cases where we pay for transaction costs individually, we face a conflict of interest with you because we have an incentive to minimize the transactions within your account.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Customer Relationship Summary

Conversation Starters

➔ Help me understand how these fees and costs might affect my investments:
If I give you $10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

Additional information about the services we offer can be found in our ***Regulation Best Interest Disclosure*** and ***Item 5*** of our Form ADV Part 2A Disclosure Brochure and ***Item 4*** of our Form ADV Part 2A Appendix 1 (Wrap Brochure).

What are your legal obligations to me when acting as my broker-dealer or when acting as my investment advisor? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation as your broker-dealer or act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time the way we make money creates conflicts with your interests because they can affect the recommendations and investment advice we provide you. Here are some examples to help you understand what this means:

❖ Our financial professionals have access to the CreativeOne Wealth Platform offered by an affiliate of ours separately registered as an investment adviser with the SEC. While CreativeOne Wealth is an affiliate of ours, our financial professionals receive no personal benefit from recommending that you utilize its services.

❖ We receive indirect forms of compensation from certain investment product sponsors in the form of on-going trail commissions and other revenue-sharing arrangements from investments you hold in mutual funds, annuities and other investments. These ongoing charges are incorporated in the fees you pay to hold these products and are paid to us as a distribution fee that we share with your financial professional. This creates a financial incentive to encourage you to purchase investments that pay us these fees or to recommend share classes that pay ongoing fees over other share classes that may be available at a lower cost.

❖ Certain product sponsors and their affiliates offer to pay for or reimburse costs incurred by us or our financial professionals in connection with attending educational meetings and seminars. We have an incentive to recommend investments offered by product sponsors who offer these benefits over those who do not.

❖ When you open a brokerage or advisory account through us, cash held in your account is automatically placed into interest-bearing federally insured bank accounts offered through a cash-sweep program. We receive a portion of the interest earned on your cash sweep balance which creates an incentive if you maintain a cash balance.

❖ Brokerage accounts and certain advisory accounts are subject to standard clearing account fees including annual account fees, ticket charges, margin interest, custody (including IRA custodial fees) and other fees. In some cases, the charge you pay may be more than our cost. We have an incentive to recommend our services over those of our competitors.

Conversation Starters

➔ How might your conflicts of interest affect me, and how will you address them?

Additional information about conflicts of interest between you and us, please review our Form ADV Part 2A Disclosure Brochure generally, including ***Items 4, 8, 10, 11, 12, 14, 15 and 18.***

How do your financial professionals make money?

Our financial professionals serve as independent contractors and not as our employees. When providing brokerage services, our financial professionals receive a portion of the commissions (including trailing commissions) we receive. When providing investment advisory services they receive a portion of the advisory fee you pay. Our financial professionals must recommend investment products and manage your account in your best interest, however different levels and forms of compensation create incentives to recommend some products, strategies, programs, or services over others. Some examples of the conflicts of interest between you and our financial professionals related to compensation include:

Customer Relationship Summary

	Broker-Dealer Services	Investment Advisory Services	
		Investment Management	Financial Planning/Consulting
Examples of Conflicts of Interest	❖ The more trades you make, the more transaction-based fees our financial professionals earn. This creates an incentive for them to encourage you to trade more often. ❖ Our financial professionals receive different levels of compensation for selling different types of investments. This includes sales loads, which vary by share class and trail compensation, paid to us by investment product sponsors. Except for trail commissions, your financial professional is not compensated unless you engage in securities transactions. This creates an incentive for your financial professional to make recommendations of investment products that pay higher commissions over lower-cost products.	❖ Your financial professional receives a portion of the fees you pay us for our investment advisory services. Because most of our Investment Management Services charge assetbased fees, our financial professionals have an incentive to recommend that you increase the amount of assets you have under our management because it will increase their compensation. Additional conflicts may exist and you are encouraged to discuss the above and any other potential conflicts with your financial professional.	❖ Many of our financial professionals offering investment advisory services are also registered representatives of our brokerdealer and/or are licensed insurance salespersons. When they prepare a financial plan for you, they have an incentive to recommend that you purchase commission-paying products and then separately offer to help implement your plan by serving in the separate capacity as an insurance salesperson or brokerdealer representative. Although this conflict exists, we attempt to mitigate its effect by notifying you of its existence and confirming that you are under no expectation or obligation to implement any recommendations through our financial professionals acting in their separate capacities as registered representatives of a broker-dealer or insurance salespersons.

For additional information about our business practices, compensation, and conflicts of interest, please review our *Regulation Best Interest Disclosure* and our Form ADV Part 2A Disclosure Brochure and Form ADV Part 2A Appendix 1 (Wrap Brochure).

Do you or your financial professionals have legal or disciplinary history ?

Yes. A free and simple search tool is available to help research firms and their financial professionals at investor.gov/CRS.

Conversation Starters

- As a financial professional, do you have any disciplinary history? For what type of conduct?
- Who is my primary contact person?
- Is he or she a representative of an investment adviser or a broker–dealer?
- Who can I talk to if I have concerns about how this person is treating me?

Additional information about us and the services we provide can be found in our Regulation Best Interest Disclosure, our Form ADV Part 2A Disclosure Brochure, and our Form ADV Part 2A Appendix 1 (Wrap Brochure). Each is available, including an up-to-date copy of this Form CRS, for free online by searching our firm's name or CRD number (152974) at: www.adviser info.sec.gov or by reaching out to us via the contact information below.

creativeOne SECURITIES

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FINRA/SIPC and an Investment Advisor
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FORM ADV – PART 2A BROCHURE

September 10, 2026

This Brochure provides information about the qualifications and business practices of CreativeOne Securities, LLC ("C1S"). If you have any questions about the contents of this Brochure, please contact us at (913) 814-6097. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about C1S (CRD No. 152974), including a copy of its Form ADV Part 1, is available on the SEC's website at **www.adviserinfo.sec.gov**.

C1S is a registered investment adviser. Registration of an investment adviser does not imply any certain level of skill or training.

Item 2. Material Changes

Except for the following items, there have been no material changes to the contents of this Form ADV Part 2A Brochure since its last annual update dated March 31, 2026:

- *James Clements is the new President.*
- *Chang Shin is the new Chief Compliance Officer.*

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Item 4. Advisory Business

Besides being a firm specializing in providing investment advisory services, CreativeOne Securities, LLC (f/k/a Client One Securities LLC) ("C1S") is also a broker-dealer, Member FINRA/SIPC, which began its business in November 2010. The firm provides financial planning, consulting and investment management services to a wide variety of clients. C1S is wholly-owned by Creative One Marketing Corporation, an insurance marketing firm. C1S does not control any other firm. The advisory services of C1S are described in detail below. C1S also offers a wrap fee discretionary management service which is described in a separate Form ADV Part 2A "Wrap Fee" Appendix 1 Brochure.

Consulting Services

Consulting Services provided by C1S vary by the objectives and financial circumstances of each client. The specific services provided are determined at contract signing and described in the Consulting Services Agreement. Services begin by the client's C1S Representative performing an analysis of the client's existing assets, insurance, taxes, investment objectives, investments and other related matters. After this information-gathering step is completed, C1S's Representative then confers with the client to provide C1S's recommendations. Advice about investments is generally limited to stocks, bonds, mutual funds, exchange-traded funds, variable life and annuity contracts, and government-issued securities and use of other investment managers. Other topics regarding, for example, insurance, taxes, estate planning, and other matters are addressed in the scope requested by the client.

For clients who have a large or highly-diversified securities portfolio or who need extensive financial, estate, tax or insurance advice, C1S may prepare written recommendations which assist the clients in arriving at an investment and insurance mix designed to achieve their investment objectives. The scope of the report is determined in advance between the client and C1S.

Clients decide which investment recommendations to accept and implement. Clients are also free to select any brokerage, insurance or other product provider to purchase (or sell) the investments, insurance, or other products discussed with C1S. C1S does not guarantee results, and losses can occur from receiving Consulting Services.

Changes in client's financial condition, personal circumstances, goals, or general economic conditions may trigger changes to the advice provided by C1S. To the extent that material changes have occurred to a client's circumstances or goals, or to the extent a client requests C1S address a new project, the client will be asked to sign a new Services Agreement.

All Consulting Services advice is based on information provided by the client. It is the client's responsibility to be certain that C1S has current and accurate information.

Financial Planning Services

C1S also stands ready to perform Financial Planning Services which are designed to combine advice relating to a range of financial subjects selected by the client. In designing a project or comprehensive financial plan, regardless of the complexity, Representatives will:

- Interview the client, analyze the client's financial needs, and assist the client in developing realistic goals and objectives based on information provided by the client. The Representative may also clarify planning problems and outline strategies designed to meet the client's goals. A client typically retains C1S to perform a comprehensive plan covering such topics as investments, taxes, insurance, retirement, and estate planning, among other subjects. A client may also engage a C1S Representative for projects that may require annual or more frequent reviews if more complex long-term planning is needed.

- Prepare an initial written project or comprehensive plan in the scope requested by a client based on the information gathered during the client interview and needs evaluation. This plan may include establishing a clear set of objectives, an outline of resources, a written investment policy statement, an asset allocation model, strategy recommendations, retirement, estate, education, or insurance planning and product recommendations. Reports usually include the steps to take for implementing advice provided.
- Help the client implement the plan including, if needed, assistance in purchasing and/or selling securities and/or insurance products.
- Review the plan periodically in the scope and frequency agreed upon in advance with the client.

The Representative may also, as requested, recommend changes to the client's investment portfolio or plan, either in writing or verbally. Changes in the client's financial condition, personal circumstances, goals, or general economic conditions may trigger changes in the plan. To the extent material changes have occurred to a client's circumstances or goals, or to the extent a client requests a new project, the client will be asked to sign a new Services Agreement. The client may initiate contact with the client's Representative as often as needed and the Representative will schedule conferences as needed, usually no less than annually.

Clients decide which investment recommendations to accept and implement. Clients are also free to select any brokerage, insurance or other product provider to purchase (or sell) the investments, insurance, or other products discussed with C1S. C1S is also a securities broker-dealer and many of its Representatives are also licensed to offer securities and insurance products. C1S and the Representatives will receive customary commissions for the sale of such products should a client decide to make purchases through C1S and a Representative. Clients are free to purchase such products other than through C1S and the Representative. This compensation creates a conflict of interest.

All planning is based on information provided by the client. It is the client's responsibility to be certain C1S has current and accurate information to enable C1S to prepare the initial plan, and it is the client's responsibility to inform the Representative of material changes affecting the investments and planning strategies implemented so the Representative has them for future reference.

If a conflict exists between the interests of C1S and the interests of the client, the client is under no obligation to act upon C1S' recommendations and if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through C1S.

Retirement Plan Services

C1S can provide the following services to retirement plan accounts:

- ERISA Section 3(21) Plan Investment Advisory Services: C1S can perform non-discretionary investment advisory services at the retirement plan level as described below.

  (a) C1S will review and/or prepare the plan's Investment Policy Statement ("IPS"), including assessing the following: (a) the criteria for selecting money managers and the due diligence procedures that the plan followed in selecting its money managers and/or mutual funds; (b) the basis for asset mix and rebalancing limits; (c) the performance measurement criteria; (d) monitoring procedures of money managers and other investment-related vendors; (e) composition and relevancy of quarterly performance reports; (f) composition of custodial reports; and (g) termination procedures for money managers.

  (b) C1S will advise client of appropriate investment categories for client's retirement plan consistent with client's adopted policy statement.

  (c) C1S will advise client of appropriate assets/investment instruments which are consistent with the investment categories selected by client.

(d) C1S will monitor performance of the investment choices of client and provide periodic advice regarding possible changes to the investment selections.

(e) Client shall have ultimate authority for selecting the investments for client's retirement plan.

❖ ERISA Section 3(21) Participant Investment Advisory Services: C1S can perform non-discretionary investment advisory services for plan participants as described below:

C1S will provide individual investment advice to client's Plan participants in the scope and at the times mutually agreed between client and C1S. Such advice may include specific recommendations; however, the Plan participants retain ultimate authority with respect to the investment of their Plan assets.

❖ ERISA Section 3(38) Plan Investment Management Services: C1S can perform discretionary investment management services at the plan level as described below. Note, this service is distinct from the Section 3(21) services described above.

(a) C1S will review and/or prepare the plan's IPS, including assessing the following: (a) the criteria for selecting money managers and the due diligence procedures that the plan followed in selecting its money managers and/or mutual funds; (b) the basis for asset mix and rebalancing limits; (c) the performance measurement criteria; (d) monitoring procedures of money managers and other investment-related vendors; (e) composition and relevancy of quarterly performance reports; (f) composition of custodial reports; and (g) termination procedures for money managers;

(b) For a participant-directed individual account plan, the IPS will set forth the number of general investment options and asset class categories to be offered to plan participants with a goal of providing a menu of investments that will allow for the creation of well diversified portfolios designed to provide for long-term appreciation and capital preservation through a mix of equity and fixed income exposures.

(c) Once client approves the IPS, C1S will review the investment options available through the plan and will notify the plan's record keeper as to C1S's instructions to add, remove and/or replace specific "core" investment options to be offered to plan participants that meet the criteria set forth in the IPS. C1S will monitor the core investment options and, on a regular basis, provide reports to client and instructions to the plan's record keeper to remove and/or replace investments that no longer meet the IPS criteria. C1S may, to the extent consistent with its fiduciary duties, select "core" investment options that provide revenue sharing; provided that, however, any compensation C1S may receive from revenue sharing payments shall offset its fees and any 12b-1 fees C1S may receive shall be rebated to the plan.

(d) C1S will retain final decision-making authority with respect to removing and/or replacing investments in the core lineup, and the client will not have any further responsibility to communicate instructions to any third-party, including the plan's record keeper, custodian and/or third-party administrator.

(e) C1S will monitor investments in the plan's accounts with Custodian and shall implement changes to investment selections as C1S deems appropriate.

❖ ERISA Section 3(38) Participant Investment Management Services: C1S can perform discretionary investment management services for plan participants as described below:

(a) C1S will comply with the plan's written investment policy statement with respect to plan assets invested through participant's plan account.

(b) C1S will provide a participant with investment advice, which may include asset allocation advice designed to identify one or more optimal retirement plan investment allocations, and may

thereafter select investments for the participant's plan account pursuant to the discretionary authority granted to C1S by the participant in a separate discretionary account management agreement.

(c) C1S will direct or effect transactions within the participant's plan account in securities and/or insurance products whose characteristics are deemed by C1S to correspond to participant's investment objectives.

(d) C1S will direct or make such periodic adjustments to participant's plan account as it deems necessary, in accordance with the participant's financial circumstances, investment objectives and risk tolerance, as identified by the participant, and subject to the reasonable restrictions imposed by the participant.

(e) C1S may hire and terminate third party investment managers ("Managers") to manage all or a portion of the participant's plan account.

❖ Non-Fiduciary Services: C1S can perform the non-fiduciary services as described below.

(a) C1S will meet with representatives of client, at intervals mutually acceptable to client and C1S, to discuss investment performance.

(b) C1S will provide client with a quarterly report regarding:

(i) performance of each investment selected by client for client's plan; and

(ii) performance of one or more comparative benchmarks.

(c) C1S will assist client with selection of any plan service providers as requested, but client shall be ultimately responsible for selecting other plan service providers.

(d) C1S will contact client at least annually to determine if there have been any changes in client's investment policy statement, and will remind client at least quarterly, in writing, that client should inform C1S if there have been (or are anticipated to be) any such changes.

(e) As requested, C1S will conduct informational/educational group meetings with plan participants at initial installation of the plan, and periodically thereafter in the scope and frequency mutually agreed upon between client and C1S regarding:

(i) general investment concepts;

(ii) investment objectives and performance of selected investments; and

(iii) investment allocations and strategies available to meet various investment objectives.

C1S's assistance in participant investment education shall be consistent with and within the scope of the definition of investment education found in Department of Labor Interpretive Bulletin 96-1 unless C1S has agreed to provide individual investment advice concerning the prudence of any investment.

Services Involving Recommendations to Other Investment Advisers for Mutual Fund and Variable Annuity Management Services

C1S has entered into agreements with third party investment advisers specializing in mutual fund management. C1S refers clients to such third party advisers in return for a portion of the advisory fee paid by the client. Third party investment advisers include, but may not limited to: MAI Capital Management, Security Benefit, Nationwide Advisory, Geowealth, Brookstone Capital AssetMark, Inc., SEI Investment Advisory Group, Lockwood Financial Group, Inc., CLS Investments, LLC, Orion Portfolio Solutions, Envestnet, and Goldman Sachs Advisor Solutions.

The programs offered by these firms may not be available to all clients because of account minimums, client objectives and manager restrictions. For specific details regarding the above referenced firms, C1S

recommends that clients review the individual firm's ADV Part 2A brochure delivered to the client prior to or at the time of opening an account.

C1S's services include assisting a client in selecting a third party investment adviser whose investment styles and strategies suit the client's individual needs and financial objectives. The investments managed in these accounts are usually limited to mutual funds and exchange-traded funds. With most programs, C1S's role is usually limited to making the referral. In others, C1S assists the client in completing an investment planning questionnaire to help guide the third party adviser's investment decisions for the client. C1S may also assist clients in making investment and portfolio allocation decisions for these accounts. Depending on the program selected by the client, the third party adviser may or may not have discretionary power to purchase or sell investments in the client's account. C1S Representatives are available to their clients to discuss the selected manager's performance. Also, clients may or may not pay a sales load for mutual funds or annuities, or commissions on other investments placed within the client's account.

CreativeOne Wealth, LLC (f/k/a ChangePath LLC) Platform Services

C1S has entered into a sub-advisory relationship with CreativeOne Wealth, LLC (f/k/a ChangePath, LLC) a registered investment adviser that is also an affiliated entity. CreativeOne Wealth, LLC provides a Platform service which allows C1S Representatives to have access to back office support which includes, but is not limited to, the ability to provide clients with consolidated reporting and other client relationship management tools. In addition, CreativeOne Wealth, LLC offers a discretionary management program that consists of proprietary models. A C1S representative assists the client in completing an on-line investment questionnaire which then creates an investment proposal ("Investment Proposal"). The Investment Proposal consists of model asset allocation recommendations based on the client's risk tolerance, time horizon, investment objectives and restrictions, tax status and financial sophistication. Each asset classes may include but not be limited to, stocks, exchange-traded funds ("ETFs"), mutual funds and external third-party money managers. The C1S Representative will only have discretionary trading authority over the assets included in the models. If the client chooses to include an Indexed Annuity product in their portfolio, the C1S Representative will receive a sales commission directly from the insurance carrier. .

The client's portfolio and its performance are monitored by the client's Representative. The frequency of these reviews and transactions made for a client's account are determined by the Representative. C1S Representatives typically meet with the client on an as-needed or as-requested basis to discuss the portfolio and other aspects of the service with a minimum of one annual review.

Investments are not held by C1S. Instead, all investments managed by C1S through the CreativeOne Wealth, LLC Platform are held at the brokerage firm ("Custodian") through which transactions are placed. For this program the Custodian is Charles Schwab & Co., Inc. ("Schwab").

As noted above C1S Representatives will exercise discretionary authority granted by clients. When doing so, it allows Representatives to select the securities to buy and sell, the amount to buy and sell, when to buy and sell, without obtaining specific consent from the client for each trade. Clients should be aware that Representatives may make different recommendations and effect different trades with respect to the same securities and insurance products to different advisory clients.

Rebalancing of the asset allocation models by CreativeOne Wealth, LLC will occur as necessary. Account rebalancing is accomplished by buying and selling shares of stocks, mutual funds or ETFs to reach target allocations, or moving funds between external third-party money managers to reach target allocations.

Separately Managed Advisory Services

C1S and its Representatives offer individual discretionary investment management services for their 401(k) or other employer sponsored qualified plans. Representatives will review the clients financial circumstances and objectives along with the investment offerings within the plan and allocate and rebalance the funds

within the account to meet the clients investment goals. Clients typically grant authority to C1S to monitor, manage and rebalance the investments within the account. While prior approval for each transaction is not required, clients may become aware of account activity through custodian security features, account alerts, or dual authentication requirements.

C1S will not have custody of the account, but C1S will be granted web based access to the account through the client's username and password information. This access will be limited to viewing the account and processing securities transactions only.

Client Choice Investment Management Services

C1S provides clients with investment management and reporting services by means of its Client Choice Investment Management service. Through the service, clients receive investment analyses, investment recommendations, statement reflecting holdings and transactions and on-going account monitoring services by a C1S Representative. C1S Representatives will be granted discretionary trading authority by the client. This allows C1S to buy and sell securities within the account at the times and prices that they feel is in the best interest of the client and in line with the client's investment objectives. Clients are free to impose reasonable restrictions on the types of investment in the account.

The initial investment recommendations are based on financial information gathered from the client including net worth, risk tolerance, financial goals and objectives, client investment restrictions, and overall financial conditions. Investment in the Client Choice program are not held by C1S. Instead, all investment managed through this program are held by a qualified custodian, Charles Schwab & Co., Inc. ("Schwab"), a broker-dealer, member FINRA/SIPC.

To the extent a client receives any account or other investment ownership statements from C1S. C1S recommends the client carefully compare the report to Schwab's statements.

As of December 31, 2025, C1S has regulatory assets totaling $2,427,452,344 under discretionary management and $113,728, under non-discretionary management.

Item 5. Fees and Compensation

Fees paid to C1S are for C1S advisory services only. The fees do not include, for example, the fees charged by third parties such as third-party managers, or accountants and attorneys assisting with providing the client with accounting and legal advice. Commissions on transactions and other account fees will also be charged by brokerage firms in accordance with the account’s brokerage firm’s normal commission schedule. See Item 12, Brokerage Practices. Customary commissions on insurance are also not included.

In addition to C1S's advisory fee, clients will incur separate fees and charges imposed by the qualified custodian, broker-dealer, and/or clearing firm used to execute transactions and custody client assets (for example, Pershing LLC). These fees are described further, including C1S's practice of marking up certain of these fees and the resulting conflict of interest, under Item 12, Brokerage Practices, of this brochure.

Prospective clients should be aware that in addition to C1S's advisory fees, each mutual fund in which a client's assets are invested also pays its own advisory fees and other internal expenses which already have been deducted from the fund's reported performance. Depending on the fund, a client may be able to invest directly in the shares issued by the fund with or without incurring any sales or third-party management fees. Account maintenance fees are also deducted by the custodian.

In addition, there are tax effects pertaining to fund share redemptions, and other sales, made by C1S on behalf of clients. Redemptions and sales are taxable events in non-qualified accounts, which may accelerate the recognition of capital gains, and losses, and frequent redemptions and sales may result in short-term, rather than long-term, capital gains and losses.

The client should be aware that C1S feels that its advisory fees are reasonable but that lower fees may be

found for comparable services available through other sources.

Consulting Services Fee

All fees for Consulting Services are negotiable. C1S's fees for providing Consulting Services may be charged on a fixed fee per project basis, an hourly fee per project basis or as an on-going monthly retainer fee. The hourly rate ranges from $100 - $250 per hour, the fixed fee ranges from $300 to $10,000, and the on-going monthly retainer ranges from $50 to $100 per month depending on the services requested. There is a minimum fee of $300 for hourly and fixed fee projects.

The consulting fee is dependent upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the project and the scope and number of reports requested by a client. For example, a client requesting a simple portfolio overview without a report or identification of financial problems or formulation of solutions, would be charged $100 per hour. A client wanting a more in depth project including identification of financial problems, formulation of solutions and an analysis of financial goals and objectives, would be charged $250 per hour. The amount of time required to complete the project will depend on the specifics of the project requested and the client is provided with an estimate of the total fee prior to signing the Services Agreement. Consulting services fees are dependent on what the client is looking for, if the client wants a more structured financial plan then a Financial Planning Agreement will be recommended. Consulting Services are for short term projects or reviews of the client's current financial condition.

The consulting project fee is due upon signing of the services agreement. Payment arrangements are established in the services agreement but clients typically pay fees directly as opposed to having their account debited. The fee may be waived in whole or in part by C1S at its sole discretion. All Project Consulting Services will be completed within 6 months of signing the agreement.

The retainer consulting services fee is due as of the first day of each calendar month services are provided. Any partial months shall be prorated based on the number of days services were provided within the month. Any prepaid unearned fee will be refunded to the client.

The services agreement may be terminated at any time by giving ten (10) days advance written notice from either party to the other. Any unearned prepaid project fee is returned to client upon termination. Clients are obligated to pay any fee earned by C1S to date of termination, but not yet paid. When calculating any refund, a rate of $150 per hour shall apply to work already performed on a fixed fee basis.

The fees described above may change based on special situations such as an expansion of a project, increase in the number of reviews, more specialized needs of the client, more complex planning or more detailed reporting. Before such a change is made, the client is given 30 days prior written notice and agrees to such changes by signing a new Services Agreement, or an amendment thereto.

Financial Planning Fees

Fees charged for Financial Planning are negotiable and are based on a fixed-fee per project basis, or on an hourly fee basis. The hourly rate ranges from $100 - $250 per hour and the fixed fee ranges from $300 to $10,000, depending on the complexity and nature of the project. The hourly rate may be negotiated. There is a minimum fee of $300.

Hourly rates and total fees are determined by each C1S Representative estimating the complexity of the client's circumstances, the level of skill required to perform the service, and the amount of time that will be required to perform research, analysis, and plan preparation. The estimated fee is disclosed to the client prior to contract signing. The hourly or fixed fee is dependent upon the nature and scope of the advice requested by the client, nature and number of investments in a client's portfolio, amount and nature of research required to complete the project and the scope and number of reports requested by a client.

For example:

Detailed Personal Financial Plan 10 hours @ $200/hour $ 2,000

Insurance and Risk Management Review 8 hours @ $200/hour $ 1,600

Employee Benefits Planning 6 hours @ $250/hour $ 1,500

Income Tax Planning 6 hours @ $150/hour $ 900

Complex Retirement and Estate Planning 30 hours @ $300/hour $ 9,000

The fee is due upon signing of the services agreement. The fee is payable directly by a client and not deducted from the client's account. Payment arrangements are established in the services agreement. The fee may be waived in whole or in part by a Representative or C1S at their sole discretion. Each client retains the right to terminate the services agreement with C1S at any time, in writing and without prior notice, for any reason. C1S retains the right to terminate any engagement at any time, for any reason, by giving 10 days' written notice. Any unearned pre-paid fee is returned to the client upon termination. When calculating any refund, a rate of $150 per hour shall apply to work already performed on a fixed fee basis.

The fees described above may change based on special situations such as an expansion of a project, increase in the number of reviews, more specialized needs of the client, more complex planning, or more detailed reporting. Before such a change may be made, the client is given 30 days prior written notice. Financial Planning projects will be completed within 6 months of signing the Agreement.

Fees do not include product transaction commissions, or the fees for third-party professional services, e.g., investment managers, attorneys, accountants or other third parties.

Retirement Plan Services Fee

Fees for C1S's Retirement Plan Services described above are based upon the value of assets under management and vary between 1.8% and 2.0% per year for Section 3(21) services, and from 1.5% to 3% per year for section 3(38) services. Fees are payable in advance monthly or quarterly, depending on the account, and are negotiable. The initial fee is based upon account value when the account is opened and is provided to the end of the quarter. Upon termination, all prepaid unearned fees are prorated and returned to the client. Fees can be amended by C1S upon 30 days advance written notice by C1S to client.

Assets exceeding $20,000 deposited to the plan during any quarter shall be charged a pro-rated monthly fee based upon the number of days remaining in the month. No adjustment shall be made to the quarterly fees for changes in the market value of securities held in the plan during the quarter. A pro-rata refund shall be made if assets valued at $20,000 or more are withdrawn during the quarter. Any 12b-1 fee earned by C1S in a client's account will be rebated to the clients account.

In the event the client's account is terminated prior to the last day of any quarter, all fees paid C1S are pro-rated to the date of termination and any unearned prepaid fee shall be refunded to the client. Either party may terminate the agreement upon 10 days advance written notice to the other.

C1S may act as investment manager to plan's individual plan participants and will earn asset-based advisory fees from those individuals, by separate agreement with them, for providing management services.

Fees payable to C1S for Retirement Plan Consulting service are, with the client's prior permission, automatically deducted from the client's account when due. C1S will liquidate without obtaining prior permission of the client, money market shares to pay the fee and, if money market shares or cash value are not available, other investments will be liquidated. Authorization for the deduction of fees from the managed account is contained in the Services Agreement. The client may terminate the authorization for automatic deduction at any time by notifying C1S in writing.

Fees for Services Involving Referrals to Other Investment Advisers for

Mutual Fund and Variable Annuity Management Services

C1S's Representatives are free to negotiate the fee with each client for many of the programs, including those noted above in Item 4. Thus, fees will vary from client to client and may be higher than obtainable from other advisers providing similar services, including C1S itself. The range of fees for various programs utilized by C1S differ but usually range between .50% and 2.5%.

Program sponsors also charge fees in these programs. For example, for accounts falling below $50,000 in value, SEI Investment Advisory Group charges a $60 annual custodial fee. It also charges account disbursement and closing fees, as well as commissions on non-SEI fund transactions and for equity transactions. Clients are encouraged to read SEI's application documents and disclosures thoroughly. AssetMark charges a fee of .25% per year for custodial fees, subjected to a $250 minimum.

C1S's portion of the total fees described above typically ranges from .50% to 1.50%. Because C1S's Representatives are free to negotiate fees, fees will vary from client-to-client for similar or identical services. Fees are deducted from the client's account. Any prepaid unearned fee is prorated and returned to the client. Clients should also be aware that, absent transaction charges, total fees exceeding 2% per year are generally considered higher than those charged by other comparable programs available to a client.

The services, reports and contract termination provisions provided by these programs vary as do the costs. Clients are encouraged to obtain and carefully review the contracts and disclosure documents of the third party manager and/or program sponsor whose services they are considering, including Part 2A of Form ADV, so they understand fully the services being provided and fees being charged. Clients are also encouraged to compare programs.

CreativeOne Wealth, LLC Platform Fees

The fee for CreativeOne Wealth, LLC is calculated as a percentage of the total value of investments under C1S's management within the CreativeOne Wealth, LLC Platform at the rates that range from 0.55% to 2.5% annually. The fee is negotiated between the investment adviser representative and each individual client, therefore individual clients receiving similar services may be paying different fees. No performance-based fee is charged.

Fees are due monthly in arrears and calculated based on the market value of the investments in the account as of the last business day of the recently completed month. The initial fee is charged from the date of inception of an account through the end of the first month in which an account is opened. If assets with a market value of $20,000 or greater are deposited into or withdrawn from an account in a single day after the beginning of a billing period, the advisory fee is prorated based on the number days remaining in the billing period. C1S may, at its discretion, combine the value of related accounts for fee calculation purposes. Upon termination any fees due for services rendered will be prorated to the date of termination and deducted from clients account.

In addition to the advisory fee, there may be transaction, commission, administrative, servicing and other fees charged by the Custodian.

Separately Managed Account Fees

Fees for Separately Managed services are negotiable and determined by each C1S Representative. The fee is a flat annual fee negotiated at the time of entering into the contract, based on the time and complexity of required to monitor and manage the account assets. The fee is paid monthly before services are provided. The initial fee is paid in arrears in the calendar month immediately following the contract signing and subsequent payments are paid within seven (7) days of the start of a new calendar month. The initial fee is based on the value of the assets under management as of the last day of the most recently completed calendar month. The annual fee may be reviewed and adjusted each year based on the total assets under management as of the last day of the most recently completed calendar before the anniversary date of the agreement and any resulting adjustment will be reflected in a signed addendum.

Client Choice Investment Management Fees

Fees for Client Choice Investment Management services are paid monthly after services are provided. The annual fee is negotiable. The C1S Representative determines the advisory fee up to a maximum of 2.00% annually. The fee due monthly is calculated based on the daily average value of the assets under management within the account(s), including assets held in money market funds. The fee for any partial month is prorated based on the number of days that services were provided. The fee does not include any transactional or custodial charges, those are charged to the account separately by the account custodian.

Other Compensation

C1S is a securities broker-dealer and many of its Representatives are also licensed to offer securities and insurance products. C1S and the Representatives will receive customary commissions for the sale of such products should a client decide to make purchases through C1S and a Representative. Clients are free to purchase such products through brokers or agents not affiliated with C1S. All prospective and existing clients are hereby advised that this conflict exists. A C1S Representative may recommend either no-load or load mutual funds for a client's account. In all cases, the investments must be in the best interests of the client. Advisory fees are not reduced by the amount of sales compensation a Representative receives, but Representatives may consider commissions as a factor when determining asset-based fees.

Item 6. Performance Based Fees and Side-by-Side Management

C1S does not charge any performance-based fees. All fees are disclosed above.

Item 7. Types of Clients/Minimum Account Size

C1S makes Financial Planning and Consulting available to a wide variety of clients including. but not limited to, individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

C1S does not generally require a minimum account size for financial planning and consulting services. There is a minimum of $25,000 required for all management programs, except CreativeOne Wealth, LLC Alpha UMA which requires a minimum of $150,000. There may also be minimum account sizes and fees for the services offered by third-party managers, please see their individual Form ADV Part 2A brochures. A minimum fee of $300 is charged for Consulting and Financial Planning services.

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

C1S's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon its historical and projected financial performance); and cyclical analysis (determining the desirability of an issue based upon the status of an issue within the price cycle the security or similar securities have followed historically). The risk of loss always exists with fundamental analysis, because the valuation of a firm's existing and future business and market prices forecast may not be precise or may be influenced by market and other factors. The risk of loss always exists with cyclical analysis because a predicted cycle may not occur when expected or because markets for a certain class of securities or specific securities did not conform to the market cycle as expected. All securities analysis methods and strategies, even those used by C1S may involve a high degree of risk and losses can occur. Investing in any securities involves the risk of loss that clients should be prepared to bear.

C1S's main sources of information include, but are not limited to, financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, public filings and company press releases.

Neither C1S, nor the third party managers it may secure, guarantee the results of the advice given. Thus, significant losses can occur by investing in any security, or by following any strategy, including those recommended or applied by C1S.

C1S may recommend traditional exchange-traded funds ("ETF"). ETF shares are bought and sold at market price unlike mutual funds. ETFs are subject to risks similar to those of stocks.

Item 9. Disciplinary Information

The SEC issued an Order dated March 11, 2019 (SEC Administrative Proceeding File No. 3-19062) (the "Order"), relating to the resolution of a matter that C1S had self-reported to the SEC under the SEC Division of Enforcement's Share Class Selection Disclosure Initiative (the "SCSD Initiative"). C1S was subject to an SEC administrative proceeding relating to mutual fund share class selection practices between January 1, 2014 and March 10, 2016. The SEC alleged that C1S willfully violated Sections 206(2) and 207 of the Advisers Act when it purchased, recommended, or held mutual fund share classes for advisory clients that charged Rule 12b-1 fees when lower-cost share classes of the same funds were available for which such clients were eligible. C1S received 12b-1 fees in connection with these investments and failed to adequately disclose the resulting conflicts of interest in its Form ADV or otherwise. Without admitting or denying the findings, C1S consented to: (a) cease and desist from committing or causing any violations and any future violation of sections 206(2) and 207 of the Advisers Act; (b) be censured; (c) pay disgorgement and prejudgment interest in the aggregate amount of $35,375; and (d) comply with certain undertakings. The SEC did not impose a civil penalty on C1S based on C1S having self-reported pursuant to the SCSD Initiative.

Item 10. Other Financial Industry Activities and Affiliations

Besides being an investment advisory firm, C1S is also a securities broker-dealer and sells securities and insurance to clients. C1S and the Representatives will receive customary commissions for the sale of such products, other than variable annuity and insurance contracts having sub-funds to be managed by C1S, should a client decide to make purchases through C1S and it's Representative. This compensation creates a conflict of interest. All prospective and existing clients are hereby advised that this conflict exists. Approximately 50% of C1S Representatives time is spent on advisory services if the Representative is registered as a securities representative for C1S. Those Representatives who are not securities representatives spend 100% of their time providing advisory services.

C1S along with being both an investment adviser and broker-dealer is under common control with various other entities, including Creative One Marketing Corporation, an insurance agency, and Representatives of C1S offer insurance products for these firms, including variable annuities. Thus, when offering insurance products, both compensation and related-issuer conflicts exist. There is an incentive to offer the insurance products of these companies.

C1S is also under common control with CreativeOne Wealth, LLC, a registered investment adviser. C1S and CreativeOne Wealth, LLC in addition share an office location. As noted above, C1S offers CreativeOne Wealth, LLC Platform advisory services to its clients. A conflict exists when C1S recommends this service as there is an incentive in that C1S receives a portion of the advisory fee paid to CreativeOne Wealth, LLC for the service and Creative One Marketing Corporation, their common owner receives a portion of the fees received by both entities. Creative One Marketing Corporation benefits from the recommendation of CreativeOne Wealth, LLC over other non-affiliated investment advisers. C1S and its Representatives strive to recommend the product or service that is in the clients best interest.

C1S also may recommend third party investment advisers. A conflict exists when C1S recommends the services of a third party who has agreed to share a portion of its management fee with C1S. The compensation paid by such third party advisers may vary and thus, there may be a conflict of interest in

recommending a manager who shares a larger portion of its advisory fees over another manager. The fees of the third party manager may be more or less than they would have been had the client obtained the services directly form the third party money manager. In all such cases C1S will only recommend third party advisers that are registered or exempt from registration in the client's jurisdiction, also see Item 5 for more information.

C1S offers internal managed programs in addition to those offered through third party managers. These internal programs result in C1S receiving more compensation as there are no fees going to an outside manager. This revenue incentive causes a conflict of interest for C1S when it's Representatives recommend these internal programs. At all times C1S and it's Representatives strive to make recommendations that are in the best interest of their clients.

Insurance Agency Activities and Recommendations of Fixed Index Annuities

Many of CreativeOne Securities, LLC's ("C1S," "the Firm," "we," or "us") investment adviser representatives ("IARs") are also separately licensed as insurance agents. In that separate capacity, IARs may recommend and sell insurance products, including fixed index annuities ("FIAs"), to advisory clients and other individuals. This dual capacity creates a material conflict of interest that clients should understand before acting on any recommendation involving an FIA or other insurance product.

Nature of the Conflict

When an IAR recommends an FIA, the IAR earns insurance commissions that are typically paid by the issuing insurance carrier and that are substantially higher, and structured differently, than the asset-based advisory fees C1S charges on managed accounts. An IAR therefore has a financial incentive to recommend an FIA, or to recommend that a client liquidate advisory account assets to fund an FIA purchase, that is separate from, and may be inconsistent with, the IAR's fiduciary duty to the client's advisory account. This incentive exists regardless of whether the FIA recommendation is made inside or outside a formal advisory conversation, because clients reasonably rely on the overall relationship with their IAR when evaluating any investment recommendation.

Capacity Disclosure — Advisory vs. Insurance Agent

Before recommending an FIA or any other insurance product, your IAR is required to affirmatively disclose to you, in writing, the specific capacity in which the IAR is acting for that recommendation, namely, as an insurance agent and not as your investment adviser representative. Insurance sales activity is not part of the advisory services C1S provides under your advisory agreement, and FIA recommendations are not subject to C1S's advisory fee schedule, are not monitored as part of your ongoing advisory account and are not covered by the fiduciary obligations C1S owes with respect to your advisory account assets. If you are uncertain whether a particular recommendation is being made to you as an advisory client or as an insurance prospect, you should ask your IAR to confirm the capacity in writing before proceeding.

Best-Interest Review for FIA Recommendations

Notwithstanding the separate-capacity structure described above, C1S requires that any FIA

recommendation made to a current advisory client satisfy a documented best-interest review before implementation. That review must include, at minimum:

- Consideration of the FIA against reasonably available alternative products and strategies, including the effect of surrender charges, caps, participation rates, and other product features on the client's overall financial picture;
- Collection and evaluation of client-specific information — including liquidity needs, time horizon, existing annuity or insurance holdings, and the percentage of the client's investable assets the FIA would represent — sufficient to form a reasonable basis that the recommendation is in the client's best interest;

- A written record, retained in the client file, identifying the capacity in which the recommendation was made and the basis for the best-interest determination; and
- Supervisory review and sign-off before the FIA application is submitted to the carrier.

C1S will not treat an advisory client's existing relationship with an IAR as, by itself, a sufficient basis for an FIA recommendation. The review above applies independent of, and in addition to, any suitability review performed by the issuing insurance carrier.

Marketing and Client Communications

C1S reviews and approves marketing materials used by IARs to ensure that insurance products, including FIAs, are not presented in a manner that could reasonably be misinterpreted by clients or prospective clients as part of C1S's advisory program. Materials that reference FIAs alongside advisory investment strategies must clearly and conspicuously identify FIAs as insurance products sold in the IAR's separate insurance-agent capacity, outside the scope of the advisory relationship and C1S's fiduciary obligations to the advisory account

Your Right to Ask Questions

You are entitled to ask your IAR, at any time, (i) whether a specific recommendation is being made in an advisory or insurance agent capacity, (ii) what compensation the IAR will receive from the recommendation, and (iii) how the recommendation was evaluated against your existing advisory holdings. C1S's Chief Compliance Officer is available to answer questions about this disclosure and about any FIA recommendation you have received.

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

When C1S Representatives make recommendations for the purchase of insurance or securities they also receive customary commissions as insurance salespersons or securities registered representatives. The receipt of commissions in return for insurance or securities product purchases creates a conflict of interest for Representatives when they recommend the purchase of such products to clients.

Representatives of C1S may buy or sell securities for themselves that they also recommend. When a transaction for a Representative, or an account related to a Representative, is contemplated, a client's transaction is given priority. C1S has developed a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of the firm's staff, the Code requires, among other procedures, such "access persons to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at the firm to determine whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for clients' accounts. The Code also established certain bookkeeping requirements relating to federal reporting rules. The Code is required to be reviewed annually and updated as necessary. A complete copy of the firm's Code will be provided upon a client or prospective clients request.

Item 12. Brokerage Practices

Financial Planning and Consulting clients can use the brokerage service of their choice to process transactions. If requested C1S will recommend a broker-dealer. C1S will recommend a broker-dealer that it is familiar with, thus will not evaluate the commissions and services of other broker-dealers. Those clients receiving third party manager services will be required to use the custodial services required by the third party manager. C1S recommends that clients review the ADV Part 2A brochures for more information regarding specific third party managers.

Client Choice clients use the qualified custodial services of Schwab. Schwab and C1S are independently owned and operated and not affiliated. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we require that you use Schwab as your custodian, you will decide whether to do so and open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you.

We seek a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including: combination of transaction execution services along with asset custody services; capability to execute, clear, and settle trades; capabilities to facilitate transfers and payments to and from accounts; breadth of investment products made available; availability of investment research and tools that assist us in making investment decisions; quality of services; competitiveness of the price of those services and willingness to negotiate them; reputation, financial strength and stability of the provider; their prior service to us and out other clients; availability of other products and services that benefit us.

Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Schwab Advisor Services is Schwab's business serving independent investment advisory firms. They provide our clients and us with access to its institutional brokerage-trading, custody, reporting, and related services many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business.

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

Services That May Not Directly Benefit You. Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, but Schwab's own and that of third parties. We may use this research to service all or some substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that: provides access to client account data; facilitate trade execution and allocate aggregated trade orders for multiple client accounts; provide pricing or other market data; facilitate payment of our fees from our clients' accounts; and assist with back-office functions, recordkeeping, and client reporting.

Services That Generally Benefit Only Us. Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include: educational conferences and events; technology, compliance, legal and business consulting; publications and conferences on practice management and business succession; and access to employee benefits providers, human capital consultants, and insurance providers.

Schwab provides some of these services itself, in other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such an occasional business entertainment of our personnel.

Pershing Clearing and Custody Fee Arrangement

CreativeOne Securities, LLC (“C1S” or the “Firm”) generally recommends that advisory clients use Pershing LLC (“Pershing”) as the broker-dealer and qualified custodian for their accounts. C1S acts as an introducing broker with respect to Pershing, and Pershing serves as clearing broker and custodian pursuant to a clearing agreement between C1S and Pershing.

Separate custodial and administrative fees. In addition to any advisory fees clients pay to C1S, clients who have custody assets at Pershing will incur separate fees charged directly by Pershing for certain account activity and services. These fees include, among others, fees for account inactivity, outgoing account transfers, and outgoing wires. These fees are charged to the client's account and are separate and in addition to C1S's advisory fee.

C1S's mark-up of certain Pershing fees. Under the terms of C1S's clearing agreement with Pershing, C1S is permitted to markup certain of these fees above the amount Pershing charges C1S, and to retain the difference. C1S currently exercises this ability, at its discretion, with respect to certain fee categories charged to advisory accounts, which may include fees related to account inactivity, outgoing account transfers, and outgoing wires, among others.

The specific fees subject to mark-up, and the amount of any mark-up, are set by C1S in its discretion and are subject to change from time to time under C1S's clearing agreement with Pershing. Clients may request current information about specific fees applicable to their account, including whether and to what extent a given fee reflects a mark-up retained by C1S, from their financial professional or from C1S directly.

Conflict of interest. C1S's ability to markup Pershing's fees and retain the resulting revenue creates a financial incentive for C1S to recommend Pershing as custodian, and to maintain this fee arrangement, rather than recommending or negotiating an arrangement that may be more favorable to the client. This is a conflict of interest: C1S's compensation is directly increased by fees charged to advisory clients in connection with account inactivity, outgoing transfers, and wires, in addition to the advisory fee the client separately pays C1S.

Not all custodial arrangements permit this practice. Not all clearing brokers or custodians permit introducing broker-dealers such as C1S to markup custodial or clearing fees charged to advisory accounts. Clients who custody assets elsewhere, or through a different clearing arrangement, may not be subject to this type of mark-up. Clients should consider this conflict of interest when evaluating C1S's recommendation to use Pershing.

C1S addresses this conflict of interest through disclosure in this brochure. Clients may direct questions about specific fees charged to their account, or about this fee arrangement generally, to their financial professional or to C1S's Chief Compliance Officer.

Item 13. Review of Accounts and Reports

For clients receiving Counseling and Financial Planning Services, a written project report or comprehensive financial plan is prepared in the scope requested by the client during the initial interview and subsequent counseling sessions. Reviews of financial plans are performed from time to time by the Representative and the Representative's planning staff at the times requested by a client and as the Representative deems appropriate. More than one Representative may be involved in the development of a plan and, with the client's permission, the client's legal and accounting professionals may be involved. When outside professionals become involved in the planning process, the cost of the outside professionals is the responsibility of the client.

Clients receiving third party management services receive statements at least quarterly from their account's custodian. The client may receive a written performance report as often as is agreed upon between the client and C1S or the third party manager, but not more often than quarterly. The client's portfolio is regularly reviewed by the client's C1S Representative as frequently as agreed upon by the client and the Representative, or more frequently if the Representative determines, to ensure the investments in the account are in line with the client's stated investment policy guidelines. Clients are encouraged to compare the information on any account statement received from C1S or the third party manager to that shown on custodial statements.

Clients receiving Client Choice services receive statements at least quarterly from Schwab. Clients'

portfolios are regularly reviewed by their respective C1S Representative as frequently as agreed upon between the client and the Representative. Clients are encouraged to compare the information on any report or statement prepared by C1S to what is reflected on statements received directly from Schwab.

Item 14. Client Referrals and Other Compensation

C1S has entered into a referral arrangement where the entity or individual making the referral to C1S receives a portion of the advisory fee on accounts referred to C1S that then become clients. Each referred client is provided with a written disclosure document describing this fee arrangement before the client signs C1S's services agreement.

C1S does not direct brokerage transactions to any third party, including Pershing, in return for client referrals and does not receive any economic benefits from non-clients for providing investment advisory services.

C1S has entered into agreements with third party investment advisers specializing in mutual fund, ETF and external money manager management. C1S refers clients to such third party advisers in return for a portion of the advisory fee paid by the client. See Item 4 for additional information.

Representatives of C1S may also enter into agreements to compensate SmartAsset Advisors LLC for providing leads on potential clients interested in financial planning and investment advisory services. Potential clients input put their contact information into SmartAsset's online tools, and in turn, SmartAsset refers this information to C1S. Representatives of C1S specify to SmartAsset how many leads, on a monthly basis, they wish to receive from SmartAsset, and the representative compensates SmartAsset for providing leads based on the amount of the self-reported investable assets of each potential client. A representative of C1S must pay this fee regardless of whether a potential client enters into a relationship with C1S. As a result, SmartAsset has an incentive to meet the lead quota per month and may have an incentive to allocate leads based on this quota rather than on other criteria, such as the strength of the match between the potential client and C1S.

Item 15. Custody

Investment Advisor Representatives provide investment advisory services through C1S. However, certain Investment Advisor Representatives of C1S may have their own legal business entities whose business names and logos may appear on marketing materials as approved by C1S, or client statements as approved by a custodian. These businesses entities, which are individually owned by the Investment Advisor Representatives and are not affiliated with C1S or the custodian, may also offer services in addition to those described in this brochure.

Neither C1S nor its Investment Advisor Representatives take custody of client funds or securities. These safekeeping services are typically provided to managed accounts only by the brokerage firm processing the securities transactions ordered by C1S.

It is important for clients to carefully review the statements they receive from their account custodian. To the extent a client receives any account or other investment ownership statement from C1S or a business

entity individually owned by an Investment Advisor Representative, C1S recommends that the client carefully compare the information in the report to that in the custodian's statements.

Item 16. Investment Discretion

When providing Discretionary Investment Management services described in Appendix 1 of ADV Part 2A through a wrap fee program or outside of a wrap fee arrangement as described in this brochure, C1S Representatives may exercise discretion when granted authority in writing by clients. C1S does not exercise discretion when offering Consulting, or Financial Planning services. C1S does not exercise discretion

without an agreement.

When granted discretion, this allows C1S to select the securities to buy and sell, the amount to buy and sell, and when to buy and sell, without obtaining specific consent from the client for each trade. Clients should be aware that Representatives may make different recommendations and effect different trades with respect to the same securities and insurance products to different advisory clients. Commission and execution of securities transactions implement through the account custodian may not be better than the commissions or execution available if the client used another brokerage firm.

Depending on the service agreement, third-party managers used to manage client accounts or portions of client accounts may have discretionary authority granted by the client to purchase and sell securities at their discretion.

Item 17. Voting Client Securities

C1S and its Representatives do not typically vote proxies on behalf of clients who will receive such notices from their account's custodian. C1S also does not typically take any action on legal notices it or a client may receive from issuers of securities held in a client's managed account. However, it is available to answer questions regarding such notices. Client's receiving CreativeOne Wealth, LLC Platform services have proxies voted by CreativeOne Wealth, LLC. We recommend you review CreativeOne Wealth, LLC Form ADV Part 2A for more detailed information regarding their proxy voting policies.

Item 18. Financial Information

C1S does not require or solicit fees of more than $1,200 six months or more in advance, thus no financial statement for C1S is attached. C1S does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client. C1S has not been subject of a bankruptcy petition.

6330 Sprint Parkway, Suite 400, Overland Park, KS 66211

| Toll-free: 888.909.9399 | Local: 913.814.6097 |

http://www.creativeonesecurities.com/

FORM ADV – PART 2A APPENDIX 1: WRAP PROGRAM

May 27, 2026

This Wrap Fee Program Brochure provides information about the qualifications and business practices of CreativeOne Securities, LLC ("C1S"). If you have any questions about the contents of this Brochure, please contact us at (913) 814-6097 or IAR@c1s.net. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about C1S (CRD No. 152974), including a copy of its Form ADV Part 1, is available on the SEC's website at **www.adviserinfo.sec.gov**.

C1S is a registered investment adviser. Registration of an investment adviser does not imply any certain level of skill or training.

Item 2. Material Changes

Except for the following items, there have been no material changes to the contents of this Form ADV Wrap Brochure since its last annual update dated March 31, 2026.

- *James Clements is the new President.*
- *Chang Shin is the new Chief Compliance Officer.*

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Item 4. Service, Fees and Compensation

Besides being a firm specializing in providing investment advisory services, CreativeOne Securities, LLC (f/k/a Client One Securities LLC) (“C1S”) is also a broker-dealer, Member FINRA/SIPC, which began its business in November 2010. The firm provides financial planning, consulting, and investment management “wrap fee” and “non-wrap fee” services to a wide variety of clients. C1S is wholly-owned by Creative One Marketing Corporation, an insurance marketing firm. C1S does not control any other firm. The “wrap fee” management services of C1S are described in detail below. Another brochure, available upon request, describes financial planning, consulting and third party manager services.

As of December 31, 2025, C1S has regulatory assets totaling $2,427,452,344 under discretionary management and $113,728,858 under non-discretionary management.

Discretionary Investment Management

C1S provides clients with wrap fee portfolio management and reporting services by means of its Discretionary Investment Management service. Through the service, clients receive investment analyses, investment recommendations, quarterly statements reflecting holdings and certain transactions and ongoing account monitoring services by C1S Representatives allowed to provide the services. Within the service are the following programs, Client Centered, Client Focused, and Cash Balance Plan. Securities managed by the firm's Representatives in the Client Focused program may include stocks, bonds, mutual funds, Exchange-Traded Funds (ETFs), private placements, options, structured products, and convertible securities. Securities managed by the firm's Representatives in the Client Centered program include primarily mutual funds. C1S Representatives may recommend mutual funds and ETFs which are available through "FundVest," a no-transaction-fee mutual fund and ETF platform available through Pershing, LLC. These programs are discussed in more detail below. C1S Representatives will use discretionary trading authority while providing these services. Clients are free to impose reasonable restrictions on the types of investments for their account.

The initial investment and asset allocation recommendations for the Client Centered and Client Focused programs are based on the financial information gathered from each client including net worth, risk tolerance, financial goals and objectives, client investment restrictions and overall financial conditions. Based on this information, the client is provided with initial investment recommendations designed to provide an appropriate asset mix consistent with the client’s objectives. The client’s portfolio and its performance are monitored by the client’s Representative in light of the client’s stated goals and objectives. The frequency of these reviews and transactions made for a client’s account are determined by the Representative. C1S Representatives typically meet with the client on an as-needed or as-requested basis to discuss the portfolio and other aspects of the service with a minimum of one annual review.

The initial asset allocation recommendations for the Managed programs are based on the financial information gathered from each client. In some cases a client questionnaire is used to identify each client's investment objectives, risk tolerance, and investment time horizon. The client and adviser will then determine the appropriate Asset Allocation Model or investment recommendation depending on the program. The client’s portfolio and its performance are monitored by the client’s Representative in light of the client’s stated goals and objectives. The frequency of these reviews are determined by the Representative. C1S Representatives typically meet with the client on an as-needed or as-requested basis to discuss the portfolio and other aspects of the service with a minimum of one annual review.

As a general rule, C1S believes that investing is best suited to those who believe in a long-term buy-and-hold policy. Therefore, clients should not expect frequent investment changes in the portfolio. However, as a result of monitoring the account, investment purchases and sales will be made.

Investments are not held by C1S. Instead, all investments managed by C1S are usually held at the brokerage firm ("Custodian") through which transactions are placed. C1S usually requires the custodial and

transaction services of Pershing, LLC, its transaction clearing firm. To the extent a client receives any account or other investment ownership statement from C1S, C1S recommends the client carefully compare the report to the custodian's statements.

As indicated above, when providing Discretionary Investment Management, C1S Representatives will exercise discretion when granted authority by clients and most clients grant discretionary authority to C1S. When doing so, it allows C1S to select the securities to buy and sell, the amount to buy and sell, when to buy and sell without obtaining specific consent from the client for each trade. Clients should be aware that Representatives may make different recommendations and effect different trades with respect to the same securities and insurance to different advisory clients. Executions of certain securities transactions not covered by the wrap service fee, and transaction executions within the wrap program, implemented through the Custodian may not be better than the commissions or executions available if the client used another brokerage firm. However, C1S believes that the overall level of services and support provided to the client by custodians and broker-dealers for any trades not covered by the wrap fee outweighs the potentially lower costs that may be available from other brokerage service providers.

If a client directs C1S to effect transactions through a particular broker/dealer, including Pershing, C1S will do so. However, such an instruction may have implications to the client which may include incurring transaction costs that may be higher or lower than if the instruction had not been given. Also, restricting C1S to particular broker/dealers may limit C1S' ability to include a client account order within block orders to obtain the best price or execution. For these reasons, Pershing LLC is the firm customarily required to be used for C1S's Discretionary Investment Management Service.

In these instances where an order error occurs by C1S, it is C1S's policy to make the client's account whole.

C1S does not process transactions through Pershing in return for Pershing referring new clients to C1S.

Discretionary Investment Management Wrap Fees

Fees for all Discretionary Investment Management services programs, Client Centered, and Client Focused, are negotiable and can be determined by each client's C1S Representative. The fee schedule is calculated as a percentage of the total value of investments under C1S's management at the rates set forth in the Fee Schedule below. No performance-based fees are charged.

Schedule of Fees

Value of Assets under Management	Annual Fee	Monthly Fee
$25,000* to $99,999	2.50%	0.208%
$100,000 to $499,999	2.30%	0.192%
$500,000 to $999,999	2.00%	0.167%
Over $1,000,000	1.80%	0.150%

Advisory fees are negotiable and include all fees and charges for services, as applicable, of C1S and certain brokerage fees and commissions. The fee does not include (a) charges for services provided by C1S, its affiliates or third parties which are outside the scope of the agreement (e.g., retirement plan administration fees, trustee fees, wire transfer fees, account fees and charges incidental to brokerage and custodial services, etc.); (b) any taxes for fees imposed by exchanges or regulatory bodies; (c) mark-ups and mark downs charged on principal trades; (d) brokerage commissions and other fees and charges imposed

because C1S or the client chooses to effect securities transactions for the account with or through a broker-dealer other than a custodian recommended by C1S; (e) sales loads and internal operating expenses on mutual funds, exchange traded funds and variable insurance contracts; (f) commission on transactions occurring after notice of agreement termination is given by one party to the other; and (g) commissions on transactions ordered by the client. East of these additional charges may be separately charged to the account or reflected in the price paid or received for the security transaction.

In a traditional "wrap fee" program, the advisor pays, among other fees, transaction charges so that such charges are not passed on to the client. However, although this is true for C1S accounts, you should be aware that mutual funds available through the "FundVest" platform do not incur a transaction charge. Therefore, there is no extra benefit to clients participating in the Client Centered program as part of a "wrap fee" program, as the majority of the mutual funds available for purchase do not have a transaction charge. Clients could receive a similar management service outside of a "wrap fee" program from another adviser for a higher or lower advisory fee.

Fees are payable monthly, in advance, and are calculated on the basis of the market value of the investments in the account, including any balances held in money market funds. The fee for the initial month is pro-rated for the period that services are provided. Subsequent fees are based upon the market value of the account at the end of each day during the previous month. Also, the account balances of related accounts may, at CIS's discretion, be combined for fee calculation purposes. Upon termination of the Agreement, any pre-paid advisory fees will be prorated and any unearned fee will be prorated and refunded. Fees are applied and prorated if assets value $20,000 or more are deposited to the account during any month. No pre-paid fee is returned based upon partial withdrawals by a client. The Investment Management Service Agreement may be terminated by ten (10) days advance written notice from either party to the other. For fee calculation purposes, C1S may combine the values of related accounts.

C1S may amend its fee schedule upon thirty (30) days advance written notice to the client.

The fees paid to C1S are for C1S's advisory services and certain, but not all, transaction commissions. (See C. below) C1S will include the costs of independent third-party manager services in its fee only in those instances where the client has not entered into an agreement directly with the manager.

Fees payable to C1S for Discretionary Investment Management services are, with the client's prior permission, automatically deducted from the client's account when due. The client will receive a statement from the Custodian showing the fee amounts debited. Authorization for the deduction of fees from the managed account is contained in the Services Agreement. The client may terminate the authorization for automatic deduction at any time by notifying C1S in writing.

Costs

C1S's "wrap" fees shown above may be more or less than that charged by C1S to another client for similar services, and by other advisers for similar services. Also, C1S's "wrap" fee, i.e., the fee covering both advisory services and certain transaction commissions, may be more or less than two fees charged separately for management and transaction brokerage services. The factors that bear upon the cost of services are the size of the account, number of transactions, strategies employed, type of securities within an account, and whether trades are placed through a brokerage firm other than the custodian resulting in per trade commissions being charged to the account.

C1S does not charge any performance-based fee.

Internal Fees of Funds and Other Excluded Costs

In the event that exchange-traded funds or mutual funds are part of a client's portfolio, the mutual funds charge additional and separate internal management fees as described in the fund's prospectus. Thus, when these funds are in a client's account, two advisory fees are imposed: one internally by the fund, the

other by C1S. Any internal 12b-1 fees payable to C1S by mutual funds in programs available through Pershing will be rebated to client accounts. Any internal 12b-1 fees payable through Schwab programs (CreativeOne Wealth, Client Choice and Cornerstone) are retained by Schwab. C1S carefully monitors client accounts and activity to make sure that all investment recommendations are in the client's best interest.

Not all transaction-related expenses are covered by the “wrap” fee schedule shown above. Mark-ups and mark-downs, spreads by market-makers, certain account charges by the Custodian, commissions and costs for transactions not placed through C1S’s recommended Custodian, commissions on transactions occurring after termination of C1S’s services agreement, and client-ordered transaction commissions are not covered. See the “Fees” section above.

Wrap Fee Incentives

Because C1S absorbs program costs based on total assets under management rather than per transaction, there are no trading incentives within the wrap program. There is an incentive to its Representatives to recommend clients sign discretionary management agreements under the C1S wrap programs as the more accounts under the program the lower the overall cost to C1S and thereby increasing the revenue which the Representative shares. Also under the Client Focused program there is an incentive for Representatives to recommend clients receive electronic rather than paper correspondence which reduces the overall cost to C1S. As these program fees are asset-based, there is an incentive for the Representative to recommend that a client not reduce positions since doing so will reduce the fee to the Representative. Also, Representatives may receive more compensation in this program over others which require separate payment for advice, brokerage and other services, thus this financial incentive may also create a conflict of interest.

Item 5. Account Requirements and Types of Clients

There is a minimum account size of $25,000 for each of the management programs. However, C1S may waive this minimum under certain circumstances, e.g., the expectation to receive more assets in the immediate future or if the client has other wrap accounts in the same program. C1S makes its services available to a wide range of clients including individuals, pension and profit sharing plans, trusts, estates, charitable organization and business entities.

Item 6. Portfolio Manager Selection and Evaluation

Third-Party Managers

Third-party managers are not used in this wrap program. These services are provided by certain select representatives of C1S.

Related Managers

Only C1S Representatives act as portfolio managers. Because of their portfolio manager role, the incentives described in “Wrap Fee Incentives” above apply. Also, C1S Representatives providing management services may not have extensive experience in portfolio management, thus may not have a history of performance to match against other individuals and management firms. Thus, the Representatives providing advice are not subject to the same selection and review process that would occur if third-party managers were being evaluated. However, only Representatives having sufficient securities knowledge and customer advisory experience are allowed to provide management services within the Discretionary Investment Management service.

Business Information

Advisory Business

See Item 4.A.

Performance Based Fees and Side-by-Side Management

C1S does not charge any performance-based fees. All fees are disclosed above.

Methods of Analysis, Investment Strategies and Risk of Loss

C1S's security analysis methods include, but are not limited to, fundamental analysis (evaluating securities based upon its historical and projected financial performance); and cyclical analysis (determining the desirability of an issue based upon the status of an issue within the price cycle the security or similar securities have followed historically). The risk of loss always exists with fundamental analysis, because the valuation of a firm's existing and future business and market prices forecast may not be precise or may be influenced by market and other factors. The risk of loss always exists with cyclical analysis because a predicted cycle may not occur when expected or because markets for a certain class of securities or specific securities did not conform to the market cycle as expected.

All securities analysis methods and strategies, even those used by C1S may involve a high degree of risk and losses can occur. Investing in any securities involves the risk of loss that clients should be prepared to bear.

C1S's main sources of information include, but are not limited to, financial newspapers and magazines, research materials prepared by others, corporate rating services, annual reports, prospectuses, public filings and company press releases.

C1S does not guarantee the results of the advice given. Thus, significant losses can occur by investing in any security, or by following any strategy, including those recommended or applied by C1S.

C1S may recommend exchange-traded funds ("ETF"). ETF shares are bought and sold at market price unlike mutual funds. ETFs are subject to risks similar to those of stocks.

Voting Proxies on Client Securities

C1S and its Representatives do not vote proxies on behalf of clients who will receive such notices from their account's custodian.

C1S also does not take any action on legal notices it or a client may receive from issuers of securities held in a client's managed account. However, it is available to answer questions regarding such notices.

Item 7. Client Information Provided to Portfolio Managers

Because third-party managers are not used in the program, no third-party manager will require information from a client. However, prior to account opening all new clients are asked for background information and are asked to complete an investment policy statement.

Item 8. Client Contact With Portfolio Managers

Clients are free to contact their C1S portfolio manager at any time.

Item 9. Additional Information

Disciplinary Information and Affiliations

The SEC issued an Order dated March 11, 2019 (SEC Administrative Proceeding File No. 3-19062) (the "Order"), relating to the resolution of a matter that C1S had self-reported to the SEC under the SEC Division of Enforcement's Share Class Selection Disclosure Initiative (the "SCSD Initiative"). C1S was subject to an SEC administrative proceeding relating to mutual fund share class selection practices between January 1, 2014 and March 10, 2016. The SEC alleged that C1S willfully violated Sections 206(2) and 207 of the Advisers Act when it purchased, recommended, or held mutual fund share classes for advisory clients that charged Rule 12b-1 fees when lower-cost share classes of the same funds were available for which such clients were eligible. C1S received 12b-1 fees in connection with these investments and failed to adequately disclose the resulting conflicts of interest in its Form ADV or otherwise. Without admitting or denying the findings, C1S consented to: (a) cease and desist from committing or causing any violations and any future violation of sections 206(2) and 207 of the Advisers Act; (b) be censured; (c) pay disgorgement and prejudgment interest in the aggregate amount of $35,375; and (d) comply with certain undertakings. The SEC did not impose a civil penalty on C1S based on C1S having self-reported pursuant to the SCSD Initiative.

Other Financial Industry Activities and Affiliations

Besides being an investment advisory firm, C1S is also a securities broker-dealer and sells securities and insurance to clients. Approximately 50% of C1S Representatives time is spent on advisory services if the Representative is registered as a securities representative for C1S. Those Representatives who are not securities representatives spend 100% of their time providing advisory services. When C1S Representatives make recommendations for the purchase of insurance or securities they also receive customary commissions as insurance salespersons or securities registered representatives. The receipt of commissions in return for insurance or securities product purchases creates a conflict of interest for Representatives when they recommend the purchase of such products to clients.

C1S along with being both an investment adviser and broker-dealer is under common control with various other entities, including Creative One Marketing Corporation, an insurance agency, and Representatives of C1S offer insurance products for these firms, including variable annuities. Thus, when offering insurance products, both compensation and related-issuer conflicts exist. There is an incentive to offer the insurance products of these companies.

C1S offers internal managed programs in addition to those offered through third party managers. These internal programs result in C1S receiving more compensation as there are no fees going to an outside manager. This revenue incentive causes a conflict of interest for C1S when its representatives recommend these internal programs. At all times C1S and its representatives strive to make recommendations that are in the best interest of their clients.

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

Representatives of C1S may buy or sell securities for themselves that they also recommend to clients. Where a transaction for a Representative, or an account related to a Representative, is contemplated, a client's transaction is given priority. C1S has developed a Code of Ethics applicable to all persons who have access to confidential client records or to recommendations being made for client accounts. Designed to prevent conflicts of interest between the financial interests of clients and the interests of the firm's staff, the Code requires, among other procedures, such "access persons to obtain preapproval of certain securities transactions, to report transactions quarterly and to report all securities positions in which they have a beneficial interest at least annually. These reporting requirements allow supervisors at the firm to determine

whether to allow or prohibit certain employee securities purchases and sales based on transactions made, or anticipated to be made, in the same securities for clients' accounts. The Code also established certain bookkeeping requirements relating to federal reporting rules. The Code is required to be reviewed annually and updated as necessary. A complete copy of the firm's Code is available upon request.

Review of Accounts and Reports

Clients receiving Discretionary Investment Management services receive statements at least quarterly from their account's custodian. The client may receive a written performance report as often as is agreed upon between the client and C1S, but not more often than quarterly. To the extent a client receives any account or other investment ownership statement from C1S, C1S recommends the client carefully compare the report to the custodian's statements.The client's portfolio is regularly reviewed by the client's C1S Representative as frequently as agreed upon by the client and the Representative, or more frequently if the Representative determines, to ensure the investments in the account are in line with the client's stated investment policy guidelines.

Client Referrals and Other Compensation

C1S does not currently have any client referral relationships with respect to its wrap fee program. Thus, it does not pay any fee to a third party for making client referrals to it. Also, as indicated above, the firm does not direct brokerage transactions to any third party, including Pershing, in return for client referrals.

Clients should be aware that there is no direct link between Pershing and C1S in connection with the advice C1S gives to clients. C1S receives economic benefits through the custody and operating relationships it has with Pershing that are not typically available to retail investors. These benefits include the following products and services, provided to C1S without cost or at a discount: research related products and tools, consulting services, access to a trading desk serving Representatives, access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares directly to or from client accounts), the ability to have advisory fees deducted directly from client accounts, access to an electronic communications network for client order entry and account information, access to mutual funds with no transaction fees, and discounts or no fees on compliance, marketing, research, technology, and practice management products and services provided by third-party vendors.

Pershing may also pay for business consulting, professional services, and research received by C1S affiliated persons and may also pay or reimburse expenses (travel, lodging, meals, and entertainment expenses) for C1S personnel to attend conferences or meetings relating to their service platforms or to their advisor custody and brokerage services generally. Some of these products and services made available by Pershing, may benefit C1S, but may not benefit its clients. Such other services made available by Pershing are intended to help C1S manage and further develop its business enterprise, and such services may or may not depend on the amount of brokerage transactions directed to them.

Clients should be aware that the receipt of economic benefits by C1S from Pershing described above, in and of itself, creates a potential conflict of interest and may directly or indirectly influence C1S' recommendation of those service providers for custody and brokerage service.

Thus, the receipt of these services creates an incentive and conflict of interest for C1S when it recommends Pershing services.

Other than the services described above, C1S and its Representatives do not direct transactions and the commissions they generate (soft dollars) to brokerage firms or other parties to receive research or other benefits.

C1S and its Representatives are also licensed to offer securities and insurance products and will receive customary commissions for the sale of such products should a client decide to make purchases or sales through C1S and the Representatives which are not covered by the wrap fee. When selling these products, a conflict of interest exists. Both load and no-load funds may be recommended.

Financial Information

C1S does not receive fees of more than $1,200 six months or more in advance, thus no financial statement for C1S is attached. C1S does not have any financial condition that is reasonably likely to impair its ability to meet its contracted commitment to any client.

This brochure supplement provides information about James Clements that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if *you did not receive C1S's brochure or if you have any questions about the contents of this supplement.*

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

James Clements

Personal CRD Number: 2445775

Located At:
6330 Sprint Parkway
Suite 400
Overland Park, KS 66211
913-402-2109

20006 Maple Street
Gretna, NE 68028
913-402-2109

CreativeOne Securities, LLC
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone (913) 814-6097 Fax (913) 273-1453
www.creativeonesecurites.com

UPDATED: 05/26/2026

Item 2: Educational Background and Business Experience

Name: James Clements

Born: 1968

Education:

Wayne State College, Wayne, NE
M.S.: Organizational Management

William Patterson University, Wayne, NJ
B.A.: Political Science
Minor: Economics

Business Background:

04/2026 - Present	President CreativeOne Securities, LLC
04/2026 - Present	Registered Representative/Investment Adviser Representative CreativeOne Securities, LLC
02/2025 - 04/2026	SVP, Chief Compliance Officer Carson Group
07/2020 - 02/2025	Chief Compliance Officer Carson Group

James Clements passed the following examinations:

- **SIE –** Securities Industry Essentials Examination *(credit received)*
- **Series 6 –** Investment Company Products/Variable Contracts Representative Examination
- **Series 7 –** General Securities Representative Examination
- **Series 9 –** General Securities Sales Supervisor (Options Module) Examination
- **Series 10 –** General Securities Sales Supervisor (General Module) Examination
- **Series 14 –** Compliance Officer Examination
- **Series 24 –** General Securities Principal Examination

- **Series 63 –** Uniform Securities Agent State Law Examination
- **Series 65 –** Uniform Investment Adviser Law Examination
- **Series 99 –** Operations Professional Examination *(credit received)*

These examinations are administered by FINRA and are designed to assess competency in various areas of the securities industry, including sales, supervision, compliance, advisory services, and operational functions.

Item 3: Disciplinary Information

James Clements does not have any material disciplinary history.

Additional information about James Clements may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

James Clements is not engaged in any other business activities.

Item 5: Additional Compensation

James Clements does not receive commissions, bonuses, or other compensation from any other business enterprise.

Item 6: Supervision

James Clements is supervised by Chang Shin, Chief Compliance Officer of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

This brochure supplement provides information about Chang Shin that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if *you did not receive C1S's brochure or if you have any questions about the contents of this supplement.*

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

Chang Shin

Personal CRD Number: 2605773

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Overland Park, KS 66211
Phone (913) 814-6097

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Phone (913) 814-6097 Fax (913) 273-1453
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UPDATED: 05/26/2026

Item 2: Educational Background and Business Experience

Name: Chang Shin

Born: 1970

Education:

University of Missouri
Bachelor of Science, Business Administration – Finance

Business Background:

09/2024 – Present	Investment Adviser Representative *Chief Compliance Officer CreativeOne Wealth, LLC
05/2026 - Present	Registered Representative/Investment Adviser Representative *Chief Compliance Officer CreativeOne Securities, LLC
06/2024 – 09/2024	Unemployed
10/2023 – 06/2024	Senior Compliance Director AE Wealth Management
02/2018 – 10/2023	Chief Compliance Officer Scout Investments, Inc.
05/2007 – 11/2017	Compliance Field Supervisor, Director of Compliance The Mutual Fund Store, LLC/Financial Engines Advisors, LLC
04/2006 - 05/2007	Registered Representative American Century Investment Services, Inc.
01/1995 – 04/2006	Other Investor Relations American Century Service Corporation

08/2002 – 02/2003	Investment Adviser Representative American Century Advisory Services, Inc
02/1999 – 02/2003	Registered Representative American Century Brokerage, Inc.
03/1996 – 02/2003	Registered Representative American Century Investment Services, Inc.

Chang Shin has successfully passed the following securities industry examinations:

- **SIE** – Securities Industry Essentials *(Waiver)*
- **Series 7** - General Securities Representative
- **Series 24** - General Securities Principal

Item 3: Disciplinary Information

Chang Shin does not have any material disciplinary history.

Additional information about Chang Shin may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

Chang Shin is associated with CreativeOne Wealth, LLC as the Chief Compliance Officer.

Item 5: Additional Compensation

Chang Shin will not receive commissions for the sale of securities products

Item 6: Supervision

Chang Shin operates as the Chief Compliance Officer of C1S and is overseen by James Clements, President of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

This brochure supplement provides information about Allison Ryan that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if *you did not receive C1S's brochure or if you have any questions about the contents of this supplement.*

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

Allison Ryan

Personal CRD Number: 4834022

Located At:
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone: (913) 814-6097

CreativeOne Securities, LLC
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone (913) 814-6097 Fax (913) 273-1453
www.creativeonesecurites.com

UPDATED: 05/26/2026

Item 2: Educational Background and Business Experience

Name: Allison Ryan

Born: 1980

Education:

University of Missouri-Kansas City
Bachelor of Science in Psychology

Business Background:

12/2010-Present	Registered Representative/Investment Adviser Representative *Director of Advisory CreativeOne Securities, LLC
02/2007-12/2010	Investment Adviser Representative Investment Advisor Corp
01/2009-03/2011	Registered Representative Broker dealer Financial Service Corp
10/2025-Present	Investment Adviser Representative CreativeOne Wealth, LLC

Allison Ryan has successfully passed the following securities industry examinations:

- **SIE –** Securities Industry Essentials (credit received)
- **Series 6 –** Investment Company Products/Variable Contracts Representative
- **Series 7** - General Securities Representative
- **Series 24** - General Securities Principal
- **Series 63** - Uniform Securities Agent State Law
- **Series 65** - Uniform Investment Adviser Law

These examinations are administered by FINRA and are designed to assess competency in various areas of the securities industry, including sales, supervision, compliance, advisory services, and operational functions.

Item 3: Disciplinary Information

Allison Ryan does not have any material disciplinary history.

Additional information about Allison Ryan may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

Allison Ryan is an employee of CreativeOne Securities.

Item 5: Additional Compensation

Allison Ryan will not receive commissions for the sale of securities products.

Item 6: Supervision

Allison Ryan is supervised by Chang Shin, Chief Compliance Officer of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure. Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

This brochure supplement provides information about Joel Mutuku that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if *you did not receive C1S's brochure or if you have any questions about the contents of this supplement.*

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

Joel Mutuku

Personal CRD Number: 4755771

Located At:
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone (913) 814-6097

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6330 Sprint Parkway, Suite 400
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Phone (913) 814-6097 Fax (913) 273-1453
www.creativeonesecurites.com

UPDATED: 05/26/2026

Item 2: Educational Background and Business Experience

Name: Joel Mutuku

Born: 1972

Education:

Washburn University, Topeka, Kansas
Bachelor of Business Administration

University of Phoenix
Master of Business Administration

Business Background:

10/2025-Present	Investment Adviser Representative CreativeOne Wealth, LLC
04/2011-Present	Registered Representative/Investment Adviser Representative *Director of Trading CreativeOne Securities, LLC
01/2009-03/2011	Investment Adviser Representative Broker dealer Financial Service Corp
01/2009-03/2011	Registered Representative Investment Advisor Corp

Joel Mutuku has successfully passed the following securities industry examinations:

- **SIE** – Securities Industry Essentials (credit received)
- **Series 7** - General Securities Representative
- **Series 24** - General Securities Principal
- **Series 63** - Uniform Securities Agent State Law (credit received)
- **Series 65** - Uniform Investment Adviser Law (credit received)
- **Series 99TO** - Operations Professional (credit received)

These examinations are administered by FINRA and are designed to assess competency in various areas of the securities industry, including sales, supervision, compliance, advisory services, and operational functions

Item 3: Disciplinary Information

Joel Mutuku does not have any material disciplinary history.

Additional information about Joel Mutuku may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

Joel Mutuku is a dual employee of CreativeOne Securities, LLC and CreativeOne Wealth, LLC.

Item 5: Additional Compensation

Joel Mutuku does not receive commissions for the sale of securities products nor any additional economic benefit from third parties for providing advisory services other than as noted above.

Item 6: Supervision

Joel Mutuku is supervised by Chang Shin, Chief Compliance Officer of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

This brochure supplement provides information about Lance Monk that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if *you did not receive C1S's brochure or if you have any questions about the contents of this supplement.*

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

Lance Monk

Personal CRD Number: 2287006

Located At:
4101 Gautier-Vancleave Road
Ste. 104
Gautier, MS 39553
(228) 497-0363

CreativeOne Securities, LLC
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone (913) 814-6097 Fax (913) 273-1453
www.creativeonesecurites.com

UPDATED: 05/26/2026

Item 2: Educational Background and Business Experience

Name: Lance Monk	**Born:** 1964
Education:	Southern Mississippi University Bachelor of Science in Banking and Finance

Business Background:

01/2011 - Present	Registered Representative/Investment Adviser Representative *Independent Contract Internal Auditor CreativeOne Securities, LLC
10/2006-12/2010	Registered Representative Broker Dealer Financial
10/2006-12/2010	Investment Adviser Representative Investment Advisors Corp

Lance Monk has successfully passed the following securities industry examinations:

- **SIE** – Securities Industry Essentials (credit received)
- **Series 7** - General Securities Representative
- **Series 24** - General Securities Principal
- **Series 63** - Uniform Securities Agent State Law
- **Series 65** - Uniform Investment Adviser Law
- **Series 99TO** - Operations Professional (credit received)

These examinations are administered by FINRA and are designed to assess competency in various areas of the securities industry, including sales, supervision, compliance, advisory services, and operational functions.

Item 3: Disciplinary Information

Lance Monk does not have any material disciplinary history.

Additional information about Lance Monk may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

Lance Monk is associated with CreativeOne Securities as an Auditor and also offers securities through C1S.

Lance Monk is also a licensed insurance agent. He spends approximately 75% of time on non-advisory related activities. In this capacity, he can affect transactions in insurance products for his clients and earns commissions, from insurance carriers, for these activities. This is separate and apart from the activities he conducts as an Investment Advisor Representative and creates a conflict of interest. This conflict may incentivize Lance Monk to recommend advice or products based on the benefits or payments to be received, rather than on client needs. If Lance Monk recommends an insurance product(s), it may be sold through CreativeOne Marketing, LLC, an insurance broker affiliated with C1S through common ownership and control. Any purchase or sale of an insurance product (including but not limited to, an indexed annuity) is at the client's sole discretion. A client is under no obligation and should carefully review all disclosures and agreements before engaging in any transactions or services.

Item 5: Additional Compensation

Lance Monk may receive commissions for the sale of securities products. He does not receive any additional economic benefit from third parties for providing advisory services other than as noted above.

Item 6: Supervision

Lance Monk is supervised by Chang Shin, Chief Compliance Officer of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

This brochure supplement provides information about Linda Patterson that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if *you did not receive C1S's brochure or if you have any questions about the contents of this supplement.*

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

Linda Patterson

Personal CRD Number: 4799187

Located At:
13403 West 126th Place
Overland Park, KS 66213
(913) 706-0051

CreativeOne Securities, LLC
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone (913) 814-6097 Fax (913) 273-1453
www.creativeonesecurites.com

UPDATED: 05/26/2026

Item 2: Educational Background and Business Experience

Name: Linda Patterson

Born: 1947

Education:

University of Nebraska, Lincoln
BS, majoring in Geography with a minor in English

University of Nebraska, Lincoln
M.Ed. in Secondary Education

University of Kansas, Edwards Campus
Master of Business Administration

Business Background:

01/2011- Present	Registered Representative/Investment Adviser Representative *Independent Contract Internal Auditor CreativeOne Securities, LLC
10/2006-12/2010	Registered Representative Broker Dealer Financial
10/2006-12/2010	Investment Adviser Representative Investment Advisors Corp

Linda Patterson has successfully passed the following securities industry examinations:

- **SIE –** Securities Industry Essentials (credit received)
- **Series 6 –** Investment Company Products/Variable Contracts Representative
- **Series 7** - General Securities Representative
- **Series 24** - General Securities Principal
- **Series 63** - Uniform Securities Agent State Law
- **Series 65** - Uniform Investment Adviser Law
- **Series 99TO** - Operations Professional (credit received)

These examinations are administered by FINRA and are designed to assess competency in various areas of the securities industry, including sales, supervision, compliance, advisory services, and operational functions.

Item 3: Disciplinary Information

Linda Patterson does not have any material disciplinary history.

Additional information about Linda Patterson may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

Linda Patterson is associated with CreativeOne Securities as an Auditor and also offers securities through C1S.

Linda Patterson is also a licensed insurance agent. She spends approximately 90% of time on non-advisory related activities. In this capacity, she can affect transactions in insurance products for her clients and earns commissions, from insurance carriers, for these activities. This is separate and apart from the activities she conducts as an Investment Advisor Representative and creates a conflict of interest. This conflict may incentivize Linda Patterson to recommend advice or products based on the benefits or payments to be received, rather than on client needs. If Linda Patterson recommends an insurance product(s), it may be sold through CreativeOne Marketing, LLC, an insurance broker affiliated with C1S through common ownership and control. Any purchase or sale of an insurance product (including but not limited to, an indexed annuity) is at the client's sole discretion. A client is under no obligation and should carefully review all disclosures and agreements before engaging in any transactions or services.

Item 5: Additional Compensation

Linda Patterson may receive commissions for the sale of securities products. She does not receive any additional economic benefit from third parties for providing advisory services other than as noted above.

Item 6: Supervision

Linda Patterson is supervised by Chang Shin, Chief Compliance Officer of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

This brochure supplement provides information about Timothy Phares that supplements the CreativeOne Securities, LLC ("C1S") brochure. You should have received a copy of that brochure. Please contact Chang Shin at 913-814-6097 if ***you did not receive C1S's brochure or if you have any questions about the contents of this supplement.***

CreativeOne Securities, LLC

Schedule 2B – Brochure Supplement

for

Timothy Phares

Personal CRD Number: 2450201

Located At:
8100 E. 22nd Street, North
Building 600, Suite T
Wichita, KS 67226
(316) 680-8011

CreativeOne Securities, LLC
6330 Sprint Parkway, Suite 400
Overland Park, KS 66211
Phone (913) 814-6097 Fax (913) 273-1453
www.creativeonesecurites.com

Item 2: Educational Background and Business Experience

Name: Timothy Phares

Born: 1965

Education:

University of Kansas - Lawrence, KS
Bachelor of Science in Petroleum Engineering

Business Background:

01/2015-Present	Registered Representative/Investment Adviser Representative *Independent Contract Internal Auditor CreativeOne Securities, LLC

Timothy Phares passed the following examinations:

- **SIE –** Securities Industry Essentials Examination (credit received)
- **Series 4 –** Registered Options Principal Examinations
- **Series 6TO –** Investment Company Products/Variable Contracts Representative Examination (credit received)
- **Series 7** - General Securities Representative Examination
- **Series 24** - General Securities Principal Examination
- **Series 63** - Uniform Securities Agent State Law Examination
- **Series 65** - Uniform Investment Adviser Law Examination
- **Series 99TO** - Operations Professional Examination (credit received)

These examinations are administered by FINRA and are designed to assess competency in various areas of the securities industry, including sales, supervision, compliance, advisory services, and operational functions.

Item 3: Disciplinary Information

Timothy Phares does not have any material disciplinary history.

Additional information about Timothy Phares may be found on the SEC's Investment Advisor Public Disclosure website at www.Advisorinfo.sec.gov or at the FINRA's Broker Check website at www.brokercheck.finra.org.

Item 4: Other Business Activities

Timothy Phares is associated with CreativeOne Securities, LLC as an Auditor and also offers securities through C1S.

Timothy Phares is also a licensed insurance agent. He spends approximately 75% of time on non-advisory related activities. In this capacity, he can affect transactions in insurance products for his clients and earns commissions, from insurance carriers, for these activities. This is separate and apart from the activities he conducts as an Investment Advisor Representative and creates a conflict of interest. This conflict may incentivize Timothy Phares to recommend advice or products based on the benefits or payments to be received, rather than on client needs. If Timothy Phares recommends an insurance product(s), it may be sold through CreativeOne Marketing, LLC, an insurance broker affiliated with C1S through common ownership and control. Any purchase or sale of an insurance product (including but not limited to, an indexed annuity) is at the client's sole discretion. A client is under no obligation and should carefully review all disclosures and agreements before engaging in any transactions or services.

Item 5: Additional Compensation

Timothy Phares may receive commissions for the sale of securities products. He does not receive any additional economic benefit from third parties for providing advisory services other than as noted above.

Item 6: Supervision

Timothy Phares is supervised by Chang Shin, Chief Compliance Officer of C1S. His contact information can be found on the cover page of this Schedule 2B supplemental brochure.

Mr. Shin and other individuals, as he may designate, regularly review the accounts receiving investment advisory services to monitor for suitability of recommendations and compliance with regulatory and internal procedures.

Privacy Policy

For questions contact CreativeOne Securities by email at operations@c1s.net or call 888.909.9399.

NOTICE REGARDING TREATMENT OF CONFIDENTIAL INFORMATION

CreativeOne Securities, LLC strongly believes in protecting the confidentiality and security of information it collects about you. This Notice describes our firm's privacy policy and describes how we treat the information we receive about you.

Why We Collect And How We Use Information

When we evaluate your request for our services and products, provide investment advice to you and process investment transactions for your account, you typically provide us with certain personal information necessary for us to provide these services to you. We may also use that information to offer you other services we provide which may meet your financial needs.

What Information We Collect

The personal information we collect may include:

- Name and address;
- Social Security or taxpayer identification number;
- Assets;
- Liabilities;
- Age;
- Occupation;
- Income;
- Account holdings and balance;
- Investment objectives and risk tolerance;
- Investment activity;
- Accounts at other institutions; and
- Other financial and personal information.

How We Protect Information

We do not sell your personal information to anyone.

We treat information about current and former customers and their accounts in a confidential manner. Our employees may access information and provide it to third parties only when completing a transaction at your request or providing our other services to you.

We also maintain physical, electronic and procedural safeguards to protect information. Employees and our managers and counselors are required to comply with our established information confidentiality guidelines.

Disclosure of Information

At your request, we may disclose information to attorneys, accountants, lawyers, securities professionals and others to assist us, or them, in providing services to you. We may also share information with companies that perform services on our behalf, such as the companies that we hire to perform marketing or administrative services. Companies we may hire to provide support services are not allowed to use your personal information for their own purposes. We may make additional disclosures as permitted by law.

We allow Representatives servicing your account to retain your personal information in the event they leave our firm. If you prefer to "opt out" and not allow your Representative to retain personal information about you when the Representative leaves, you may do so by writing to us, or calling thenumber at the end of this Notice.

Access to And Correction of Information

Generally, upon your written request, we will make available information for your review. Information collected in connection with, or in anticipation of, any claim or legal proceeding involving us will not be made available.

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

Further Information

For additional information regarding our privacy policy, please contact us at CreativeOne Securities, LLC by calling 888.909.9399 or email operations@c1s.net.

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