



PRIVATE WEALTH

C2 Private Wealth Fiduciary Acknowledgement

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In our advisory relationship with you, C2 Private Wealth (“C2”) owes you a fiduciary duty under the federal securities laws. This duty arises from our agreement to provide you with ongoing investment advice and requires us, among other things, to act in your best interest, provide advice with reasonable care, and fully and fairly disclose material conflicts of interest. C2 is regulated by the Securities and Exchange Commission (regulation does not imply a certain level of skill), which oversees our compliance with these obligations.

In certain contexts, including recommendations involving retirement accounts and rollovers, we may also be considered a fiduciary under Title I of the Employee Retirement Income Security Act or the Internal Revenue Code, as applicable. In this context, we also comply with the U.S. Department of Labor’s (“DOL”) Impartial Conduct Standards, which require, among other things, that advice be provided in your best interest, that compensation be reasonable, and that communications not be misleading. In all cases, we adhere to our advisory fiduciary duty and, when it applies, the DOL fiduciary standard.

Retirement Rollover Recommendations

As disclosed in our Form ADV Part 2A, we generally recommend that, to the extent feasible, you rollover assets from an employer sponsored plan to an IRA we manage. We build and implement your financial plan with multiple goals in mind including mitigating sequence of returns risk, implementing potential tax strategies, generating income from both potential market growth and contractually protected income sources, accounting for long-term care considerations and social security considerations, and protecting a surviving spouse.

Our reasonable basis that our rollover recommendations are in your best interest is rooted in our determination that managing and coordinating all of your assets on which your financial plan is built—which involves, without limitation, managing your risk and distributions on an account-by-account basis relative to the planned income distributions contained in your plan—is the most effective method to implement your financial plan as designed. We maintain policies and procedures reasonably designed to validate to establish and evidence the reasonable basis for our recommendations.

When we recommend a rollover to an IRA we manage, we will receive either an advisory fee for managing those assets in a securities account or an affiliate will receive a commission if we recommend allocating those assets to an insurance product. This creates a financial incentive for us to recommend rollovers generally and also creates a conflict of interest when we decide how to allocate the assets of a rollover. Additional information about our fees and conflicts of interest is available in our Form ADV Part 2A, in particular [Item 4](#) and [Item 5](#).

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