



# TRANSFORM RETIREMENT

**Firm Brochure**  
(Form ADV Part 2A)

**March 30, 2023**

Transform Retirement, LLC  
118 N. Monroe, #848  
Green Bay, WI 54305

Phone: (920) 246-1889  
CRD # 317252

Part 2A of Form ADV (the “Brochure”) provides information about the qualifications and business practices of Transform Retirement, LLC. If you have any questions about the contents of this Brochure, please email [mark@transformretirement.com](mailto:mark@transformretirement.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Transform Retirement, LLC is either registered or exempt from registration in states for which it has clients; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about Transform Retirement, LLC is available on the SEC’s website at <https://www.adviserinfo.sec.gov>.

## Item 2: Material Changes

There have been some changes to this brochure which may be considered material since it was last updated on March 22, 2022.

This brochure has been updated (Items 5 & 11) to note that fees may be charged to discretionary client accounts, when requested by clients. When clients make such a request, they will receive statements from the qualified custodian listing all transactions and will be provided a copy of the invoice(s) for each fee deducted. The deduction of fees from client accounts will cause Transform Retirement to be deemed to have custody of such accounts solely due to such deduction.

Other noteworthy changes include disclosure that Transform Retirement utilizes Charles Schwab as the custodian for discretionary accounts for individual client accounts (Item 12) and that clients with discretionary accounts may delegate authority to Transform Retirement to receive and vote proxies on their behalf (item 17).

## Item 3: Table of Contents

- Item 2: Material Changes.....2***
- Item 3: Table of Contents .....2***
- Item 4: Advisory Business.....3***
- Item 5: Fees & Compensation.....5***
- Item 6: Performance-Based Fees .....6***
- Item 7: Types of Clients .....6***
- Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.....7***
- Item 9: Disciplinary Information .....9***
- Item 10: Other Financial Industry Activities and Affiliations .....9***
- Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.9***
- Item 12: Brokerage Practices ..... 10***
- Item 13: Review of Accounts ..... 11***
- Item 14: Client Referrals and Other Compensation ..... 11***
- Item 15: Custody ..... 11***
- Item 16: Investment Discretion ..... 12***
- Item 17: Voting Client Securities..... 12***

<b>Item 18: Financial Information .....</b>	<b>12</b>
<b>Item 19: Requirements for State Registered Advisers .....</b>	<b>12</b>
<b>Investment Adviser Brochure Supplement ADV Part 2B .....</b>	<b>13</b>
<b>Item 2: Educational Background and Business Experience .....</b>	<b>14</b>
<b>Item 3: Disciplinary Information .....</b>	<b>15</b>
<b>Item 4: Other Business Activities .....</b>	<b>15</b>
<b>Item 5: Additional Compensation .....</b>	<b>15</b>
<b>Item 6: Supervision .....</b>	<b>15</b>
<b>Item 7: Additional Requirements for State Advisers .....</b>	<b>15</b>

## Item 4: Advisory Business

Transform Retirement is a privately owned limited liability corporation founded in 2021 to help individuals succeed in and through retirement through aligning their financial goals with biblical principles. Transform Retirement’s founder, Mark Nicholas, has served retirement plans in many capacities since 1998 and is passionate about improving outcomes through thoughtful, personalized engagements with savers and their families. We believe that financial wellbeing should be Christ- focused and family-oriented to optimize successful financial outcomes.

Transform Retirement is a fee-only firm. The firm does not sell any commissioned products and is not affiliated with any entities that sell financial products or services.

### Types of Services

#### Services to Employer Sponsored Retirement Plans

Clients may engage Transform Retirement to provide a wide range of services for their employer-sponsored retirement plan and employees, on a one-time or ongoing basis. Clients will be billed only for the services elected in our agreement. In general, these services may include any or all the following:

- Discretionary or Non-Discretionary Investment Management – We will formulate and maintain the plan’s investment policy statement to help ensure that the plan's investment selections are prudent plan investments. Using this, Transform Retirement will scour the universe of available investments and select (or recommend) investments best suited for the unique needs of your plan and plan participants. Plan investments will be monitored on an ongoing basis, making (or recommending) changes as needed. We will also provide ongoing monitoring reports to our client for plan investments. Where the plan does not have a fixed investment menu (e.g., SIMPLE IRA), we may work

with employees to create and implement a custom investment plan based on their individual circumstances.

- Personalized Financial Planning – We may assist employees with holistic financial planning to optimize their household net worth, not just their retirement account.
- Fiduciary Plan Administration – We may accept certain responsibilities as the named plan administrator for the plan, as such term is defined in ERISA §3(16) and our client agreement.
- Comprehensive Plan Review – We examine all major components of how your retirement plan is operating and identify its strengths and weaknesses. This comprehensive review covers all areas of plan operations including plan design, costs, compliance, cybersecurity, and investment utilization.
- Due Diligence/Selection of Providers – We will provide a detailed comparison and analysis of plan providers, bound only by the restrictions imposed by clients, if any. This could include plan recordkeepers, third party administrators, custodians, trustees, auditors, or other investment advisors.
- Communication & Education – We will coordinate communication and/or training campaigns to help deliver meaningful information about the plan to fiduciaries, participants, and/or beneficiaries.

All services, whether discussed herein or customized for the plan based on Client requirements, shall be detailed in a written agreement and be consistent with the parameters set forth in the plan documents.

While we may utilize any type of investment permitted by the plan, we expect most investments alternatives will be mutual funds or exchange traded funds. We generally do not provide services with respect to individual real estate parcels (excluding real estate funds and REITS), non-publicly traded securities or assets, or other illiquid or hard to value investments. We will attempt to comply with reasonable restrictions or requests that the client may make regarding investment selection.

### Services to Individuals

Transform Retirement offers investment advisory and financial planning services to individual Clients, both inside and outside of qualified plans. We will work with these Clients to understand where they need assistance and offer personalized recommendations regarding their financial situation. This may include discretionary or non-discretionary investment advice, assistance with budgeting, debt management, prioritization of financial needs, utilization of pre-tax or Roth deferral options, college planning, social security optimization, decumulation strategies and/or retirement planning. This list is not intended to be comprehensive, but rather a representative sampling of potential topics. It is our intent to provide these services to Clients through video conferencing but may meet in person upon Client's request. Where we provide services to both the plan and a plan participant, it's possible that a conflict of interest may

arise, in which case it will be disclosed to the clients and resolved in a manner consistent with our fiduciary duties.

The goals and objectives of each individual client are documented in our client relationship system along with the plan of action for each client. In the provision of these services, when desired by Client, we will have discretion over certain Client accounts. Where Transform Retirement does not have discretion, Clients are responsible for facilitating any recommendations in their account(s). We may refer clients to an accountant, attorney, or other specialist for non-advisory services whenever appropriate.

### Advisory Agreements

Clients will enter into a services agreement with Transform Retirement describing the services to be provided, the responsibilities of each party, compensation, and other terms of engagement. The agreement may be terminated within five business days of its execution for any reason and without penalty.

### Participation in Wrap Programs

We do not participate in any wrap programs.

### Assets Under Management

As of March 30, 2023, Transform Retirement, LLC has regulatory assets under management totaling approximately \$1,700,000, all of which were attributed to discretionary accounts.

## Item 5: Fees & Compensation

### Fees for Services

Fees charged to plan Clients are flat fees, charged on an a la carte basis based on the services desired by Client, or hourly fees. Fees will vary for each client based on the scope and complexity of the services provided. Fees for our services are detailed in our written agreement with each client.

### Additional Fee Information

Transform Retirement does not invoice in advance and does not require, nor will it accept, advance deposits. All fees are negotiable. We may waive or charge a lesser fee from time to time for our services. While we believe that our fee structures are competitive, our fees may be higher or lower than those charged by other advisers for comparable services.

We do not reasonably expect to receive any other compensation, directly or indirectly, for the services we provide. If we receive any other compensation for such services, we will (i) offset the compensation against our stated fees, and (ii) we will promptly disclose to the client the amount of such compensation, the services rendered for such compensation, and the source of such compensation.

#### Payment of Fees

Fees for services provided to clients may be paid directly by the Client or be charged to the client accounts, if elected in our services agreement. Transform Retirement encourages all clients to pay the fee directly as deducting fees from accounts will reduce returns.

Where clients have elected to have fees paid from their accounts, Transform Retirement will provide a copy of the invoice detailing fees charged to the client and the financial institution serving as the qualified custodian of such assets will send account statements no less frequently than quarterly, including all account transactions, including fees.

All fees are due within 30 days of the invoice date. Late fees are subject to interest at the rate of 1.5% per month on unpaid balances until the account is paid in full.

#### Other Fees and Expenses

Client is responsible for the payment of any fees and charges imposed by third parties in connection with the services of others. These include, but are not limited to, fees from other advisers, custodians, recordkeepers, mutual funds and ETFs. Transform Retirement receives no part of the fees charged by others.

#### Compensation for Sales of Securities

Transform Retirement does not receive any sales commissions in connection with securities transactions.

### Item 6: Performance-Based Fees

Transform Retirement does not charge performance-based fees.

### Item 7: Types of Clients

Transform Retirement generally provides services to sponsors of employer-sponsored retirement plans (i.e. 401(k) plans, SIMPLE IRA plans) and individuals; however, it may also accept accounts for other types of clients such as trusts, estates, corporations, and foundations.

There is no minimum account size.

## Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Transform Retirement may employ a variety of investment strategies, depending on client objectives and the scope of the client engagement. For employer-sponsored retirement plan clients, we generally utilize a process designed to provide a reasonably diversified menu of investment options that allows for tactical allocation tilts without menu changes and controls overall fees. For individual clients where ongoing services are expected to be infrequent or one-time engagements, we will generally recommend a strategic asset allocation based on the client circumstances. Individual clients desiring ongoing services will generally receive a more tactical asset allocation. Our investment strategies and advice may vary depending upon each client's specific objectives. As such, we determine investments and allocations based upon a client's objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various factors. A client's restrictions and guidelines may affect the composition of their portfolio.

We analyze investment providers, retirement plan platforms and other service providers by reviewing the background of the provider, processes utilized by the providers to achieve results (along with the expected repeatability of same) and any other available information. In reviewing investments, we utilize information from various sources including Morningstar, the investment companies, and other publicly available materials.

### Risk of Loss

Investing in securities involves risk of loss that a client should be prepared to bear. The risks for each client will vary. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate a client's account from losses due to market corrections or declines. We cannot offer any guarantees that a client's financial goals and objectives will be met. Past performance is in no way an indication of future performance. Some risks that our clients will encounter include, but are not limited to:

**Market Risk:** The price of an investment may change in reaction to certain events or conditions impacting the market broadly. This risk is caused by external factors independent of a particular security's underlying value or company specific circumstances. An example might be a global pandemic impacting supply chains across the world economy.

**Interest-rate Risk:** Fluctuations in interest rates may cause prices of investments to fluctuate. For example, when interest rates rise, yields in existing bonds become less attractive, causing their market values to decline.

**Inflation Risk:** When inflation is present, a dollar today will have more buying power than it will in the future.

**Currency Risk:** Foreign investments are subject to fluctuations in the value of the US dollar against the currency of the investment's originating country. Currency risk is the possibility of losing money due to unfavorable moves in the exchange rates.

**Business Risk:** Any exposure a company has to factors that will impact its profitability is a business risk. This can include things like consumer sentiment, leadership changes or government regulations.

**Liquidity Risk:** Some investments are more readily able to be converted to cash. This risk stems from the lack of marketability of an investment that can't be bought or sold quickly enough to prevent or minimize a loss.

**Financial Risk:** Financial risk represents a variety of risks associated with a company's financings, including loans and the risk of default.

### Recommendation of Particular Types of Securities

We primarily recommend mutual funds and exchange traded funds; however, we may recommend other types of investments as appropriate for each client given their unique needs and tolerance for risk. Each type of security has its own unique set of risks associated with it. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stocks and their price can fluctuate throughout the day (although this function may be limited by some plan recordkeepers). The returns on mutual funds and ETFs will be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end." So-called "open end" mutual funds continue to allow in new investors indefinitely, which can dilute other investors' interests.



## Item 9: Disciplinary Information

Neither Transform Retirement nor any of its staff have been the subject of any disciplinary action, whether criminal, civil, or administrative (including regulatory) in any jurisdiction.

## Item 10: Other Financial Industry Activities and Affiliations

Transform Retirement and its management are not affiliated with or registered representatives of any broker-dealer. We also are not registered as a futures commission merchant, commodity pool operator, commodity trading advisor or an associated person thereof. We have no material relationships or affiliations with financial industry participants.

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

### Code of Ethics

Transform Retirement, LLC has adopted a Code of Ethics (the “Code”) which establishes standards of conduct for our supervised persons and includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest and confidentiality of client information. It contains written policies reasonably designed to prevent the unlawful use of material, non-public information by our firm or any supervised person.

The Code also requires supervised persons to report any violations of the Code promptly to the Chief Compliance Officer (“CCO”). Each supervised person receives a copy of the Code and any amendments to it and must acknowledge in writing having received the materials. Annually, each supervised person must certify that he or she complied with the Code during that year.

### Participation or Interest in Client Transactions

Transform Retirement does not engage in any principal transactions or agency cross transactions on behalf of client accounts.

### Personal Trading

Transform Retirement and its supervised persons are required to follow the Code. If appropriate and consistent with client objectives, we can cause accounts over which we have discretionary authority (or recommend to non-discretionary investment advisory clients) to

engage in the purchase or sale of securities in which we, our employees and/or our clients directly, or indirectly, have a position of interest.

Subject to satisfying policies governing ethical conduct and applicable laws, employees can trade for their own accounts in securities which are recommended to and/or purchased for our clients. The Code is designed to assure that these personal securities transactions by our employees will not in any way impair or interfere with our ability to make decisions in the client's best interest.

## Item 12: Brokerage Practices

### Factors Used to Select Custodians/Brokerages

Transform Retirement is not limited to working with any custodian or brokerage for clients; we can work with any account custodian or brokerage desired by our clients on a non-discretionary basis. Where individual clients desire discretionary advisory services, accounts will be placed with Charles Schwab as the qualified custodian to hold securities and facilitate discretionary trading in their account. While we recommend Schwab, clients will independently decide whether to open an account with them. We receive no research, product, or service from any custodian or brokerage in connection with client accounts nor do we receive referrals from any third party in exchange for using their services. Clients selecting their own custodian or brokerage will not benefit from the Transform Retirement's abilities to obtain best execution.

Some factors that may be considered in recommending such provider include, but are not limited to:

- The providers ability to invest and execute transactions efficiently in desired securities;
- Transaction costs and other brokerage/custodial fees;
- Ease of use of technology by the client;
- Reputation, financial strength and stability;
- Customer service provided by the brokerage/custodian.

### Trade Aggregation

Transform Retirement does not aggregate securities to be purchased or sold for multiple clients.

## Item 13: Review of Accounts

### Frequency and Nature of ERISA Account Reviews

For our qualified plan clients, investments will be reviewed on a quarterly basis or to the extent dictated in the investment policy for the plan, if less frequent, and memorialized with a monitoring report. The review will serve to ensure each investment continues to be a prudent investment for the plan, in accordance with the policies established for such review. If, after such review, we believe an investment is no longer suitable as a plan investment, we will coordinate with the client and other service providers to remove and/or replace it.

### Frequency and Nature of Individual Account Reviews

Account reviews for individual clients, who engage us on an as needed basis, will be completed as requested by the client. Clients desiring periodic reviews may schedule these at any desired frequency; clients will not receive reviews of their accounts unless they take action to schedule a subsequent consultation with us. These reviews would be expected following material changes in economic, market or political climates or when a client has a significant shift in their financial situation, such as a change in employment, inheritance, or change in family status. Reports will be customized to the needs of each individual client but will tend to focus on their progress towards financial objectives and may include certain reporting on client investments.

Individual clients may also be granted access to planning application(s) to facilitate ongoing conversations regarding progress towards their financial goals.

## Item 14: Client Referrals and Other Compensation

Transform Retirement, LLC is compensated only through fees charged to our clients for the performance of services. We do not receive any other form of compensation from any party.

We do not compensate any person, directly or indirectly, for client referrals.

## Item 15: Custody

Transform Retirement is deemed to have constructive custody of client funds only where it has written authority from a client to deduct its fees from the account and solely due to that ability. We do not have physical custody of any client account. All clients will receive statements directly from their qualified custodian and are encouraged to carefully review those statements when received.

## Item 16: Investment Discretion

As described above in Item 4, Transform Retirement can have discretion over the selection of securities to be bought or sold in client accounts without obtaining prior consent or approval from our clients when engaged as the plan's discretionary investment adviser/manager. However, these transactions can be subject to specific investment objectives, guidelines, or limitations that the client has previously set forth, or that have been agreed upon in writing. Discretionary authority is conditioned upon authorization, which will be evidenced by the client's execution of the client agreement. Where we have investment discretion, we remain bound by the investment objectives and goals of our clients.

## Item 17: Voting Client Securities

Where Transform Retirement is engaged to provide discretionary investment management for our qualified plan clients, we may also be delegated the authority from our client to receive and vote proxies on the account. We maintain a proxy voting procedure that governs the process used to determine if and how to vote a particular proxy. All votes will be made in accordance with guidance provided by the US Department of Labor and solely in the best interest of our client. Clients may request a copy of our proxy voting procedure and/or details on how its shares have been voted at any time by emailing us.

## Item 18: Financial Information

Transform Retirement does not have any financial impairment that would preclude it from meeting contractual commitments to our clients. We have never been the subject of any bankruptcy proceeding.

## Item 19: Requirements for State Registered Advisers

Please see the Brochure Supplement Form ADV Part 2B below for information regarding our principal executive, Mark Nicholas.



Investment Adviser Brochure Supplement ADV Part 2B

**March 30, 2023**

Supervised Person: Mark S. Nicholas

118 N. Monroe #848

Green Bay, WI 54305

Phone: (920)246-1889

Email: [mark@transformretirement.com](mailto:mark@transformretirement.com)

Individual CRD # 4584095

Form ADV Part 2B brochure supplement provides information about Mr. Nicholas that supplements the Transform Retirement firm brochure. You should have received a copy of that brochure. Please contact Mr. Nicholas if you did not receive a copy or if you have any questions about the contents of that brochure or this supplement. Additional information about Mr. Nicholas (Individual CRD #4584095) is available on the Securities and Exchange Commission's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## Item 2: Educational Background and Business Experience

Mark S. Nicholas, Founder

Born: 1977

### Education:

- Bachelor of Science in Mathematics from Frostburg State University
- Certified Pension Consultant (CPC), Qualified Pension Administrator (QPA) and Qualified 401(k) Administrator (QKA) credentials from the American Society of Pension Professionals and Actuaries.

The CPC, QPA and QKA credentials are administered by the American Society of Pension Professionals and Actuaries. To attain each, candidates must complete a series of educational curriculum and pass a proctored examination. To maintain the credential, members must complete at least 40 hours of qualifying continuing education every two years.

### Business Experience:

- PAi Trust Company, Inc. – President (2020-2021) and Chief Compliance Officer (2012-2021)
- Employer Retirement Investment Advisors, LLC - Director, Investment Services and Chief Compliance Officer (2010-2018)
- Plan Administrators, Inc. – Chief Compliance Officer (2010-2021) and Regulatory Analyst (2007-2010)
- Invesmart/Standard Insurance – Senior Consultant (2003-2007)
- First Financial Group – Retirement Plan Consultant (2000-2003)
- BGS&G Companies/CBIZ – Actuarial Associate (1998-2000)

### Industry Participation:

- Member, Fiduciary Investment & Risk Management Association ○ Leader, National Peer Group – Retirement Services
- Member, American Retirement Association ○ National Association of Plan Advisers
  - American Society of Pension Professionals & Actuaries ○
  - Volunteer, Retirement Plan Academy CPC Exam Grader
- Author of several articles published to ASPPA Plan Consultant and American Bankers Association Trust & Investments magazines.
- Speaker at local and national events including ASPPA Annual Conference & Wolters Kluwer's ftwilliam.com Customer Conference

### Item 3: Disciplinary Information

Mark Nicholas, as an investment adviser representative, is required to disclose all material facts regarding any legal or disciplinary event that would be material to your evaluation of him. Mr. Nicholas has no applicable legal or disciplinary events required to be disclosed under this section.

### Item 4: Other Business Activities

Mr. Nicholas has no other business activities.

### Item 5: Additional Compensation

Mr. Nicholas does not receive compensation or any other outside economic benefits from someone who is not a client for providing advisory services.

### Item 6: Supervision

Mr. Nicholas, as the sole member and employee of Transform Retirement, is responsible for all aspects of the firm including complying with federal and state regulatory rules. We recognize that not having all organizational duties segregated may create a conflict of interest.

Accordingly, Transform Retirement employs policies and procedures to ensure what is believed to be appropriate recordkeeping and supervision. Certain functions may be outsourced to assist in these efforts when deemed necessary.

### Item 7: Additional Requirements for State Advisers

As a state-registered investment adviser, Transform Retirement is required to disclose all material facts regarding certain arbitration, civil, self-regulatory organization, or administrative proceedings involving its supervised persons.

As disclosed in Item 3 above, Mr. Nicholas has not

1. Been found liable in an arbitration claim alleging damages more than \$2,500, involving:
  - An investment or an investment-related business activity;
  - Fraud, false statement(s) or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.

2. Been involved in an award or otherwise been found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
  - An investment or an investment-related business activity;
  - Fraud, false statement(s) or omissions;
  - Theft, embezzlement, or other wrongful taking of property;
  - Bribery, forgery, counterfeiting, or extortion; or
  - Dishonest, unfair, or unethical practices.

Further, Mr. Nicholas has no relationships or arrangements with any issuer of securities, nor has he been the subject of a bankruptcy petition.