

Optiwealth, LLC dba Optimal Wealth Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Optiwealth, LLC. If you have any questions about the contents of this brochure, please contact us at (617) 277-4453 or by email at: lchalmers@optimalw.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.

Additional information about Optiwealth, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Optiwealth, LLC's CRD number is: 306120.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Optiwealth, LLC on 03/07/2024, are described below. Material changes relate to Optiwealth, LLC's policies, practices or conflicts of interest.

- Optiwealth LLC has removed Blake Muraskin's 2B.

Item 3: Table of Contents

Item 1: Cover Page	
Item 2: Material Changes.....	ii
Item 3: Table of Contents.....	iii
Item 4: Advisory Business.....	4
Item 5: Fees and Compensation.....	7
Item 6: Performance-Based Fees and Side-By-Side Management.....	10
Item 7: Types of Clients.....	10
Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss.....	10
Item 9: Disciplinary Information.....	14
Item 10: Other Financial Industry Activities and Affiliations.....	14
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	15
Item 12: Brokerage Practices.....	16
Item 13: Review of Accounts.....	17
Item 14: Client Referrals and Other Compensation.....	18
Item 15: Custody.....	19
Item 16: Investment Discretion.....	19
Item 17: Voting Client Securities (Proxy Voting).....	19
Item 18: Financial Information.....	19
Item 19: Requirements For State Registered Advisers.....	20
Form ADV Part 2B - Brochure Supplement.....	21

Item 4: Advisory Business

A. Description of the Advisory Firm

Optiwealth, LLC (hereinafter "OPTIWEALTH") dba Optimal Wealth is a Limited Liability Company organized in the State of Massachusetts. The firm was formed in August 2012, and the principal owner is Ira Gene Sager.

B. Types of Advisory Services

Portfolio Wealth Management Services

OPTIWEALTH offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. OPTIWEALTH includes financial planning and consulting services as part of its portfolio wealth management services. OPTIWEALTH creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

OPTIWEALTH evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. OPTIWEALTH advises both discretionary and non-discretionary accounts. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

OPTIWEALTH seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of OPTIWEALTH's economic, investment or other financial interests. To meet its fiduciary obligations, OPTIWEALTH attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, OPTIWEALTH's policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is OPTIWEALTH's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Pension Consulting Services

OPTIWEALTH offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

Financial Planning and Consulting Services

OPTIWEALTH offers Financial Planning and Consulting Services for those clients who do not want ongoing wealth management services. These services may include investment planning, retirement planning, personal savings, educational savings, charitable giving and other areas of the Client's financial situation.

Sub-Advisors/Independent Managers

OPTIWEALTH will work with sub-advisers/independent money managers and/or investment platforms, performing initial and ongoing oversight and due diligence over the selected Sub-Advisor/Independent Manager(s) or platform to ensure strategies and target allocations remain aligned with the Clients' investment objectives and overall best interests. The Advisor shall select, remove and/or modify allocation to investment products with the Sub-Advisor/Independent Manager.

DST/1031 Exchange Consulting

From time to time, OPTIWEALTH will offer DST/1031 Exchange advice and facilitation if it is deemed suitable for the client. The DST structure permits tax deferral on appreciated property by allowing the investment of proceeds from appreciated Real Estate. Real Estate DSTs are structured to take advantage of the tax deferral opportunity afforded by section 1031 of the tax code ("1031 Exchange").

A 1031 Exchange must be completed in accordance with specific requirements to obtain the tax benefit. The real estate DSTs we recommend are designed to help investors meet the 1031 Exchange requirements, but there are circumstances unique to each investor that cannot be addressed by the investment structure. Further, each real estate DST has features that may create other tax consequences, such as state tax obligations, or generation of passive income. For this reason, we recommend that you consult your own tax professional before investing.

Real estate DSTs are not the only way investors can benefit from a 1031 exchange. The investments OPTIWEALTH recommends strive to bring certain advantages, such as diversification, professional management, and access to significant commercial properties. The structure also limits the investor's control and influence significantly, and the investment structures build in high operating and sales expenses for the investment Sponsor, manager, and affiliated entities. These expenses will lower investors' overall returns.

In recommending a real estate DST, OPTIWEALTH has a conflict of interest because the firm will charge its agreed investment advisory fee on the amount invested. The conflict arises because OPTIWEALTH charges advisory fees on securities, not on real estate. By recommending clients move assets from real estate to a security that invests in real estate, OPTIWEALTH increases its overall compensation. The firm addresses this conflict by recommending real estate DSTs only where it believes the benefits are significant enough to overcome the additional expenses. We encourage investors to carefully consider the potential investment benefit, net of fees, as well as the potential tax benefits, in deciding whether to invest in a real estate DST.

Services Limited to Specific Types of Investments

OPTIWEALTH generally limits its investment advice to mutual funds, fixed income securities, insurance products including annuities, equities, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds, non-U.S. securities and venture capital funds. OPTIWEALTH may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

OPTIWEALTH will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by OPTIWEALTH on behalf of the client. OPTIWEALTH may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent OPTIWEALTH from properly servicing the client account, or if the restrictions would require OPTIWEALTH to deviate from its standard suite of services, OPTIWEALTH reserves the right to end the relationship.

We utilize the results of a risk tolerance assessment system for each client, but also take into account the client's short- and long-term goals, age, longevity prospects and their personal investment preferences.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, and certain other administrative fees. OPTIWEALTH does not participate in wrap fee programs.

E. Assets Under Management

OPTIWEALTH has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 40,679,044	\$ 51,740,106	Dec 31, 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Wealth Management Fees

OPTIWEALTH charges fees ranging from .60%-2.00% annually of AUM. The exact negotiated fee is dependent on AUM and the complexity of services provided to the client, such as financial planning, frequency of portfolio review, portfolio management, investment planning, specialized investment research, retirement planning, personal savings, educational savings and other areas of the Client’s financial situation.

The advisory fee is calculated using the value of the assets in the Account on the last business day of the prior billing period. Clients will pay Advisor a quarterly fee, payable in advance. The Advisor/Client relationship may be terminated at any time, by either party upon written notice. Any unearned fees will be pro-rated and refunded upon termination of the Advisor/client relationship. These fees are generally negotiable at the discretion of OPTIWEALTH. The final fee rate will be memorialized in the client’s advisory agreement. Clients may terminate the agreement without penalty for a full refund of OPTIWEALTH's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Pension and 401(k) Consulting Services Fees

Asset-Based Fees for Pension and 401(k) Consulting

Total Assets Under Management	Annual Fee
\$0 - AND UP	0.80%

OPTIWEALTH uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

The final fee schedule will be memorialized in the client's advisory agreement.

Clients may terminate the agreement without penalty for a full refund of OPTIWEALTH's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the pension consulting agreement generally with 10 days' written notice. OPTIWEALTH uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Financial Planning and Consulting Fees

OPTIWEALTH offers Financial planning and consulting services which may include investment planning, retirement planning, personal savings, educational savings, charitable giving, and other areas of the Client's financial situation. Financial Planning fees range from \$2,500 to \$8,000 depending on complexity of the plan(s).

Sub-Advisors/Independent Managers Fees

Client will be billed in accordance with the separate agreement with the respective Sub-Advisor/Independent Manager. These fees range from .52%-.55%. Sub-Advisor/Independent Manager will deduct the fee from Client's account. OPTIWEALTH deducts its fee in a separate transaction. Total fees will not exceed 2%. This fee will be deducted quarterly and in advance, based on Client's AUM.

DST/1031 Exchange Consulting Fees

Upon the investor's implementation of the proposed 1031 Exchange Plan, OPTIWEALTH will charge a one-time fee not to exceed 5% of the assets (debt and equity) of the completed 1031 Exchange Plan which has resulted from OPTIWEALTH's due diligence and assistance with various administrative tasks. Fees are based on the scope and complexity of OPTIWEALTH's engagement with the investor and they are negotiable. OPTIWEALTH does not charge an ongoing fee for the amount invested in 1031 Exchange Plans.

Educational Seminars/Workshops

OPTIWEALTH provides periodic educational seminars and workshops to the general public.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in advance.

Payment of Pension Consulting Fees

Asset-based pension consulting fees are withdrawn directly from the client's accounts with client's written authorization on a quarterly basis. Fees are paid in arrears.

Payment of Financial Planning and Consulting Fees

Advisor will require an initial deposit upon engagement for financial planning or consultation. The balance shall be due and payable upon completion of the engagement deliverable.

Payment of Sub-Advisors/Independent Managers Services Fees

The timing, frequency, and method of paying fees for selection of third party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

Payment of DST/1031 Exchange Consulting Fees

OPTIWEALTH's one-time consulting fees are payable by check/ACH/Wire from the Qualified Intermediary assisting with the 1031 exchange or another client account not affiliated with the 1031 exchange. The client will sign an agreement stating the original investment amount, the date the investment was placed, and whether they will continue to receive advice from OPTIWEALTH after the initial purchase.

Payment of Educational Seminar/Workshop Fees

Educational seminars and workshops are offered for a fee of \$29.00 per course, payable in advance during the signup process, and non-refundable.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by OPTIWEALTH. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

OPTIWEALTH collects certain fees in advance and certain fees in arrears, as indicated above. Refunds for fees paid in advance but not yet earned will be refunded on a prorated basis and returned to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Neither OPTIWEALTH nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

OPTIWEALTH does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

OPTIWEALTH generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Pension and Profit Sharing Plans

OPTIWEALTH generally requires a \$500,000 account minimum, but this is negotiable.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

OPTIWEALTH's methods of analysis include Cyclical analysis, Fundamental analysis, Quantitative analysis and Technical analysis.

Cyclical analysis involves the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

OPTIWEALTH uses long term trading.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are two-fold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of

their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither OPTIWEALTH nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither OPTIWEALTH nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Ira G Sager is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. OPTIWEALTH always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of OPTIWEALTH in connection with such individual's activities outside of OPTIWEALTH.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

OPTIWEALTH may direct clients to third-party investment advisers. OPTIWEALTH will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that OPTIWEALTH has an incentive to direct clients to the third-party investment advisers that provide OPTIWEALTH with a larger fee split. OPTIWEALTH will always act in the best interests of the client, including when determining which third party investment adviser to recommend to clients. OPTIWEALTH will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where OPTIWEALTH is recommending the adviser to clients.

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

A. Code of Ethics

OPTIWEALTH has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. OPTIWEALTH's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

OPTIWEALTH does not recommend that clients buy or sell any security in which a related person to OPTIWEALTH or OPTIWEALTH has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of OPTIWEALTH may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of OPTIWEALTH to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. OPTIWEALTH will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of OPTIWEALTH may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of OPTIWEALTH to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, OPTIWEALTH will never engage in trading that operates to the client's disadvantage if representatives of OPTIWEALTH buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on OPTIWEALTH's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and OPTIWEALTH may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in OPTIWEALTH's research efforts. OPTIWEALTH will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

OPTIWEALTH will require clients to use Charles Schwab & Co., Inc. ("Schwab") Member FINRA/SIPC. OPTIWEALTH also utilizes Nationwide Investment Services Corporation as custodian for 401(k) plans.

1. Research and Other Soft-Dollar Benefits

While OPTIWEALTH has no formal soft dollars program in which soft dollars are used to pay for third party services, OPTIWEALTH may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). OPTIWEALTH may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and OPTIWEALTH does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. OPTIWEALTH benefits by not having to produce or pay for the research, products or services, and OPTIWEALTH will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that OPTIWEALTH's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

OPTIWEALTH receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

OPTIWEALTH will require clients to use Schwab, except Pension Plans to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If OPTIWEALTH buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, OPTIWEALTH would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. OPTIWEALTH would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for OPTIWEALTH's advisory services provided on an ongoing basis are reviewed at least Quarterly by Ira G Sager, Managing Director, with regard to clients' respective investment policies and risk tolerance levels. All accounts at OPTIWEALTH are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of OPTIWEALTH's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of

fees. This written report will come from the custodian. OPTIWEALTH will also provide at least quarterly a separate written statement to the client.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

OPTIWEALTH receives compensation from third-party advisers to which it directs clients.

Schwab provides OPTIWEALTH with access to Schwab' institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab. Schwab includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For OPTIWEALTH client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to OPTIWEALTH other products and services that benefit OPTIWEALTH but may not benefit its clients' accounts. These benefits may include national, regional or OPTIWEALTH specific educational events organized and/or sponsored by Schwab. Other potential benefits may include occasional business entertainment of personnel of OPTIWEALTH by Schwab personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist OPTIWEALTH in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of OPTIWEALTH's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of OPTIWEALTH's accounts. Schwab also makes available to OPTIWEALTH other services intended to help OPTIWEALTH manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to OPTIWEALTH by independent third parties. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the

fees of a third-party providing these services to OPTIWEALTH. OPTIWEALTH is independently owned and operated and not affiliated with Schwab.

B. Compensation to Non - Advisory Personnel for Client Referrals

OPTIWEALTH does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, OPTIWEALTH will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

OPTIWEALTH provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, OPTIWEALTH generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, OPTIWEALTH's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to OPTIWEALTH).

Item 17: Voting Client Securities (Proxy Voting)

OPTIWEALTH will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

OPTIWEALTH neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither OPTIWEALTH nor its management has any financial condition that is likely to reasonably impair OPTIWEALTH's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

OPTIWEALTH has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

OPTIWEALTH currently has only one management person: Ira G Sager. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

OPTIWEALTH does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

See Item 10.C and 11.B.

Form ADV Part 2B - Brochure Supplement

for

Ira G. Sager, CFP[®], AIF[®]

Managing Director and Chief Compliance Officer

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Ira G. Sager, CFP[®], AIF[®], (CRD# 4826397) in addition to the information contained in the Optiwealth, LLC dba Optimal Wealth ("Optimal Wealth" or the "Advisor", CRD# 306120) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure, or if you have any questions about the contents of the Optimal Wealth Disclosure Brochure or this Brochure Supplement, please contact us at (617) 277-4453.

Additional information about Mr. Sager is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4826397.

Item 2 – Educational Background and Business Experience

Ira G. Sager, CFP®, AIF®, born in 1956, is dedicated to advising Clients of Optimal Wealth as its Managing Director and Chief Compliance Officer. Mr. Sager earned a Master’s in Business Administration from Babson College Franklin W. Olin Graduate School of Business in 1996. Mr. Sager also earned a Master's Degree in Computer Science and Artificial Intelligence from the University of Massachusetts Amherst in 1988. Mr. Sager also earned a Bachelor of Science in Electrical Engineering from the University of Pennsylvania in 1980.

Additional information regarding Mr. Sager’s employment history is included below.

Employment History:

Managing Director and Chief Compliance Officer, Optiwealth, LLC	11/2019 to Present
Registered Representative, Purshe Kaplan Sterling Investments, Inc.	11/2019 to 04/2021
Investment Advisor Representative, Fiduciary Planning, LLC	07/2019 to 11/2019
Registered Representative, Sorrento Pacific Financial, LLC	07/2019 to 11/2019
Investment Advisor Representative, First Allied Advisory Services, Inc.	08/2012 to 07/2019
Registered Representative, First Allied Securities, Inc.	08/2012 to 07/2019
Senior Financial Advisor, Merrill Lynch, Pierce, Fenner & Smith Incorporated	12/2006 to 08/2012

CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial plannersto hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- *Education* – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- *Examination* – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- *Experience* – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- *Ethics* – Agree to be bound by CFP® Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- *Continuing Education* – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- *Ethics* – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Accredited Investment Fiduciary™ (“AIF®”)

The AIF® mark is held by the Center for Fiduciary Studies, LLC, a Fiduciary360 (fi360) company.

The professional designations awarded by fi360 demonstrate the focus on all the components of a comprehensive investment process, related fiduciary standards of care, and commitment to excellence. AIF® designees undergo an initial training program, annual continuing education, and pledge to abide by the designation's code of ethics.

Since October 2002, the Accredited Investment Fiduciary™ (AIF®) designation has been the mark of commitment to a standard of fiduciary investment excellence. Those who earn the AIF® mark successfully complete a specialized program on investment fiduciary standards of care and subsequently passed a comprehensive examination. AIF® designees demonstrate a thorough understanding of fi360's Prudent Practices for investment advisors and stewards.

Item 3 – Disciplinary Information

There are no legal, civil, or disciplinary events to disclose regarding Mr. Sager. Mr. Sager has never been involved in any regulatory, civil, or criminal action. There have been no client complaints, lawsuits, arbitration claims, or administrative proceedings against Mr. Sager.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil, or disciplinary events to disclose regarding Mr. Sager.*

However, we do encourage you to independently view the background of Mr. Sager on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4826397.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Sager is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Sager's role with Optimal Wealth. As an insurance professional, Mr. Sager will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Sager is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Sager or the Advisor. Mr. Sager spends approximately 10% of his time per month in this capacity.

Power of Zero

Mr. Sager is with Power of Zero, a retirement planning education and marketing program. Mr. Sager spends approximately 5% of his time per month in this capacity.

Item 5 – Additional Compensation

Mr. Sager has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Sager serves as the Principal and Chief Compliance Officer of Optimal Wealth. Mr. Sager can be reached at (617) 277-4453.

Optimal Wealth has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Optimal Wealth. Further, Optimal Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Optimal Wealth and its Supervised Persons. As a registered entity, Optimal Wealth is subject to examinations by regulators, which may be announced or unannounced. Optimal Wealth is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

A. Arbitrations and Regulatory Proceedings

State regulations require disclosure if any Supervised Person of the Advisor is subject to:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or

- e. dishonest, unfair, or unethical practices.
2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
- a. an investment or an investment-related business or activity;
 - b. fraud, false statement(s), or omissions;
 - c. theft, embezzlement, or other wrongful taking of property;
 - d. bribery, forgery, counterfeiting, or extortion; or
 - e. dishonest, unfair, or unethical practices.

Mr. Sager does not have any disclosures to make regarding this Item.

B. Bankruptcy

If a Supervised Person has been the subject of a bankruptcy petition, that fact and the details must be disclosed. Mr. Sager does not have any disclosures to make regarding this Item.