COMPLIANCE · JULY 2026

Form ADV

Part 2A — Disclosure Brochure

Part 2B — Brochure Supplements

ABOUT THIS BROCHURE

Brochure Overview

This Form ADV: Part 2A (the "Disclosure Brochure") provides information about the qualifications and business practices of Reciprocal Wealth, LLC ("Reciprocal Wealth" or the "Adviser"). If you have any questions about the content presented in this Disclosure Brochure, please directly contact the Adviser. You may contact the Adviser by telephone at 774-403-5105 or by e-mail at info@reciprocalwealth.com.

Reciprocal Wealth is a registered investment adviser located in the Commonwealth of Massachusetts. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission ("SEC") or by any state securities authority. Registration of an investment adviser does not imply any specific level of skill or training. This Disclosure Brochure provides detailed information about Reciprocal Wealth to assist you in determining whether to retain the Adviser.

Additional information about Reciprocal Wealth and its Advisory Persons is available on the SEC's website at www.adviserinfo.sec.gov by searching the Adviser's firm name or CRD: 342207. Clients may also obtain information on the disciplinary history of any investment adviser representative conducting business in Massachusetts by directly contacting the Commonwealth of Massachusetts Securities Division. You may do so by telephone at 617-727-3548 or by e-mail at securities@sec.state.ma.us.

ITEM 2

Material Changes

This Form ADV 2 is divided into two parts: Part 2A and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Adviser's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Reciprocal Wealth. For your convenience, the Adviser has combined these two documents into this single disclosure document, containing the material for both. Reciprocal Wealth believes that communication and transparency are the foundation of its relationship with clients. It continuously strives to provide complete and accurate information. Reciprocal Wealth encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions with the Adviser.

Material Changes. Reciprocal Wealth is a newly formed registered investment adviser.

Consequently, this represents the initial, formalized filing of the Adviser's Disclosure Brochure.

Future Changes. The Adviser may periodically amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates. An updated Disclosure Brochure and/or Summary of Material Changes shall be provided at any time that a material change occurs.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Adviser's firm name or its CRD: 342207. You may also request a copy of this Disclosure Brochure, at any time, by directly contacting the Adviser by phone at 774-403-5105 or by e-mail at info@reciprocalwealth.com.

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Advisory Services

A. Firm Information

Reciprocal Wealth, LLC ("Reciprocal Wealth" or the "Adviser") is a registered investment adviser located in the Commonwealth of Massachusetts. The Adviser is organized as a Limited Liability Company ("LLC") under the laws of the Commonwealth of Massachusetts. Reciprocal Wealth was founded in April 2026 and became a registered investment adviser in 2026. The Adviser is owned and operated by John E. Lynch, III (*Founder, Principal & Chief Compliance Officer*) and Samuel M. Chud (*Founder & Principal*). This Disclosure Brochure provides important information regarding the qualifications, the business practices and the advisory services provided by Reciprocal Wealth.

B. Advisory Services Offered

Reciprocal Wealth offers investment advisory services to individuals and high net worth individuals (each referred to as a "Client"). The Adviser serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Adviser upholds a duty of loyalty, fairness and good faith to each Client and seeks to mitigate potential conflicts of interest. The Adviser's fiduciary commitment is further described in its Code of Ethics. For more information regarding the Code of Ethics, see: **Item 11 — Code of Ethics, Participation or Interest in Client Transactions & Personal Trading**.

Wealth Management Services. Reciprocal Wealth provides customized wealth management services for its Clients. This is achieved through continuous personal contact and interaction with each Client while providing discretionary investment management and financial planning services.

Investment Management Services. The Adviser provides discretionary investment management services. Reciprocal Wealth works closely with each Client to identify investment goals and objectives as well as risk tolerance and financial situation to inform a portfolio strategy. Reciprocal Wealth will then construct an investment portfolio primarily consisting of low-cost, diversified mutual funds and/or exchange-traded funds ("ETFs") to achieve the Client's investment goals. The Adviser may also utilize individual stocks, bonds and/or other types of investments, as appropriate, to meet the needs of the Client. The Adviser may retain other types of investments from the Client's legacy portfolio due to: fit with overall portfolio strategy; tax-related reasons; or other reasons identified by Adviser and Client. Reciprocal Wealth's investment strategies are primarily long-term focused, but the Adviser may buy, sell or reallocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Reciprocal Wealth will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances and risk tolerance of the Client. Each Client will have opportunity to place reasonable restrictions on the types of investments to be held in such Client's portfolio, subject to acceptance by the Adviser. Reciprocal Wealth evaluates and selects investments for inclusion in Client portfolios only after concluding its internal due diligence process. Reciprocal Wealth may recommend, on occasion, redistributing investment allocations to diversify a portfolio. Reciprocal Wealth may recommend specific positions to increase sector or asset-class weightings. The Adviser may recommend cash positions as a hedge against market volatility. Reciprocal Wealth may recommend selling positions for reasons that may include, but are not limited to: harvesting capital gains or losses; risk exposure to a specific security or class of securities; overvaluation or overweighting of positions in a portfolio; change in a Client's risk tolerance; generation of cash to meet Client liquidity needs; or risk deemed unacceptable to the Client. At no time will Reciprocal Wealth accept or maintain custody of Client funds or securities, except for the limited authority outlined in **Item 15 — Custody**. All Client assets will be managed in designated accounts at the Custodian, pursuant to the advisory agreement.

Retirement Accounts. When the Adviser provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts ("IRAs"), the Adviser is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code ("IRC"), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Adviser will provide advice regarding a distribution from an ERISA retirement account or to roll over assets to an IRA or recommend a similar transaction, including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA or from one type of account to another type (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Adviser may earn a new or increased advisory fee as a result. No client is under any obligation to roll over a retirement account to an account managed by the Adviser.

Financial Planning Services. The Adviser provides a variety of financial planning and consulting services to Clients as part of its wealth management services. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Generally, such financial planning involves preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal or education savings and other areas of a Client's financial situation. A financial plan developed for — or financial consultation rendered to — the Client will usually include recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client: start or revise investment programs; commence or alter retirement savings; establish education savings and/or charitable giving programs. Reciprocal Wealth may refer Clients to an accountant, attorney or other specialist, as appropriate. Financial planning and consulting recommendations pose a conflict between the interests of the Adviser and the interests of the Client. For example, the Adviser has an incentive to recommend that Clients engage the Adviser for investment management services or to increase the level of assets with the Adviser, as it would increase the amount of advisory fees paid to the Adviser. Clients are not obligated to implement any recommendations made by the Adviser or to maintain an ongoing relationship with the Adviser. If a Client elects to act on any recommendations made by the Adviser, the Client is under no obligation to implement a transaction through the Adviser.

C. Client Account Management

Prior to engaging Reciprocal Wealth to provide investment advisory services, each Client is required to enter into a written agreement with the Adviser that defines the terms, conditions, authority and responsibilities of the Adviser and the Client. These investment advisory services may include:

- *Establishing an Investment Strategy* — Reciprocal Wealth, in connection with the Client, will develop an investment strategy that seeks to achieve the Client's financial goals and objectives.
- *Asset Allocation* — Reciprocal Wealth will develop a strategic asset allocation, targeted to meet the investment objectives, time horizon, financial situation and risk tolerance of each individual Client.
- *Portfolio Construction* — Reciprocal Wealth will develop and implement a portfolio for the Client that is intended to meet the stated goals of the Client while optimizing for any known constraints.
- *Investment Management and Supervision* — Reciprocal Wealth will provide tactful investment management services and also ensure ongoing oversight and monitoring of the Client's portfolio.

D. Wrap-Fee Programs

Reciprocal Wealth does not manage or place Client assets into a wrap-fee program.

E. Assets Under Management

Reciprocal Wealth is a newly established adviser. Its assets under management shall be reported in its next filing of this Disclosure Brochure. Clients may directly request updated information at any time.

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Fees & Compensation

The following delineates the fee structure and compensation methodology for the Adviser's services. Any Client engaging the Adviser will be required to execute a written wealth management agreement.

A. Fees for Advisory Services

Wealth management fees are paid monthly, in arrears, pursuant to the terms of the wealth management agreement. Such fees are calculated based on the average daily balance of the fair market value of assets under management during the month. Wealth management fees are assessed on the following schedule.

Assets Under Management			Monthly Fee	Annualized Fee
$1	*to*	$312,500	0.10%	1.20%
$312,501	*to*	$625,000	0.09%	1.08%
$625,001	*to*	$1,250,000	0.08%	0.96%
$1,250,001	*to*	$2,500,000	0.07%	0.84%
$2,500,001	*to*	$5,000,000	0.06%	0.72%
$5,000,001	*to*	$10,000,000	0.05%	0.60%
$10,000,001	*to*	$20,000,000	0.04%	0.48%
$20,000,001	*to*	$40,000,000	0.03%	0.36%
$40,000,001	*or*	Greater	0.02%	0.24%

B. Fee Billing

Wealth management fees are calculated by the Adviser and deducted from the Client's accounts at the Custodian. The Adviser shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's accounts at the respective month end date. The amount due is calculated as: [(*average daily closing balance of AUM*) **x** (*monthly rate*)] **x** [(*effective days in billing period*) ÷ (*total days in billing period*)]. Clients are provided with statements, at least quarterly, from the Custodian, reflecting the deduction of the wealth management fee. In addition, the Adviser will provide the Client with a report itemizing the fee, including the billing period covered by the fee, the account value during that period and the methodology used to calculate the fee. Clients are urged to review and compare the statement provided by the Adviser to the brokerage statement from the Custodian, as the Custodian does not perform verification of fees. Clients provide written authorization for wealth management fees to be deducted by Reciprocal Wealth to be paid directly from their accounts held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

C. Other Fees & Expenses

Clients may incur certain fees or charges imposed by third parties — other than Reciprocal Wealth — in connection with the investments made on behalf of the Client's accounts. The Client is responsible for all custody and securities execution fees charged by the Custodian, as such fees may be applicable.

The Adviser's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and certain other types of investments. The fees charged by Reciprocal Wealth are separate and distinct from these custody and execution fees. In addition, all fees paid to Reciprocal Wealth for investment advisory services are separate and distinct from expenses charged by mutual funds and ETFs to shareholders. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for funds, other fund expenses, account administration (e.g. custody, brokerage and account reporting) and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Reciprocal Wealth, but would not receive the services provided by Reciprocal Wealth which are designed, among other things, to assist the Client in determining which products or services are most appropriate for the Client's financial situation and objectives. Thus, the Client should review both the fees charged by the funds and the fees charged by Reciprocal Wealth to fully understand the total fees paid. For greater detail, please see: **Item 12 — Brokerage Practices**.

D. Advance Payment of Fees & Termination

Reciprocal Wealth is compensated for its wealth management services at the end of the month after services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance written notice to the other party. The Client may also choose to terminate the wealth management agreement within five (5) business days of signing the Adviser's agreement at no cost to the Client. After the five-day period, the Client will incur charges for any bona-fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client's wealth management agreement with the Adviser is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Reciprocal Wealth does not earn commissions from buying or selling securities and does not receive compensation for security transactions in any Client account, other than wealth management fees.

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Performance-Based Fees & Side-By-Side Management

Reciprocal Wealth does not charge performance-based fees for its investment advisory services. The fees charged by Reciprocal Wealth are — as described in **Item 5** above — and not based upon capital appreciation of the funds or the securities held by any Client. Reciprocal Wealth does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and the firm has no financial incentive to recommend any particular investment options to its Clients.

ITEM 7

Types of Clients

Reciprocal Wealth offers investment advisory services to individuals and high net worth individuals. Reciprocal Wealth generally does not impose a minimum relationship or account size on its Clients.

ITEM 8

Analytical Methods, Investment Strategies & Risk of Loss

A. Analytical Methods

Reciprocal Wealth employs a combination of fundamental analysis and EMH-derived asset allocation in developing investment strategies for its Clients. Research and analysis from Reciprocal Wealth are derived from numerous sources, including financial media companies, third-party research materials, Internet sources and review of company activities, including annual reports, prospectuses, releases and research prepared by others. Fundamental analysis utilizes economic and business indicators as its key investment selection criteria. Such criteria generally consist of ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria, which indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Adviser in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Adviser monitors these economic indicators to determine if adjustments to strategic allocations are appropriate.

More details on the Adviser's review process are included below in **Item 13 — Review of Accounts**. As noted above, Reciprocal Wealth generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Reciprocal Wealth will typically hold all or a portion of a security for more than a year, but may hold for shorter periods of time in order to rebalance a portfolio or in order to meet a Client's liquidity needs. At times, Reciprocal Wealth may also buy and sell positions that are more short-term in nature, depending upon the goals of the Client and/or the fundamentals of the security, sector or asset class, as well as the broader economic and market conditions at the time.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Reciprocal Wealth will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. While the methods of analysis help the Adviser in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Adviser monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Adviser's criteria review process are included below in **Item 13 — Review of Accounts**. Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's accounts. The Adviser shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Adviser of any changes in financial condition, goals or other factors that may affect this analysis. The risks associated with a particular strategy are provided to each Client in advance of investing. The Adviser will work with each Client to determine such Client's tolerance for risk as part of the portfolio-construction process. Below are some of the risks associated with the Adviser's investment strategies.

Market Risks. The value of a Client's holdings may fluctuate in response to events specific to both companies and markets, as well as in response to economic, political or social events in the United States and abroad. This risk is linked to the performance and functioning of overall financial markets.

Mutual Fund Risks. The performance of mutual funds is subject to market risk, including possible loss of principal. The price of mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily. Therefore, a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that day.

ETF Risks. The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later. There is also a risk that Authorized Participants are unable to fulfill their responsibilities. Authorized Participants are one of the major parties involved with the ETF creation/redemption mechanism in public markets. The Authorized Participants play a critical role in ensuring liquidity of ETFs and, in function, they carry the exclusive right to change the supply of ETF shares in the market. If the Authorized Participants do not fulfill this expected role, there could be an adverse impact on liquidity and the valuation of an ETF.

Stock Risks. Stocks provide investors with the opportunity for capital appreciation and growth. The stocks of smaller companies tend to offer the greatest growth potential, but also the highest levels of risk. Larger-company stocks exhibit more moderate potential for both return and risk. Stocks have a variety of risks, including: (1) *Idiosyncratic Risk* — The risk related to an individual company's business prospects or financial performance. (2) *Industry or Sector Risk* — This risk is a function of broader economic factors, which may negatively affect a company's business. (3) *Market/Systematic Risk* — This risk affects all stocks and is generally influenced by investor sentiment and economic growth.

Bond Risks. Bonds are subject to a variety of risks, including: (1) *Interest Rate Risk* — The risk that bond prices will fall as interest rates rise and vice versa. This price/rate relationship (or "Duration") is influenced by the bond's time to maturity and coupon rate. (2) *Reinvestment Risk* — The risk that any interest and principal payments received on a bond must then be reinvested at a lower rate than was previously earned. (3) *Inflation Risk* — The risk that the cost of living (i.e. inflation) increases at a rate that exceeds the bond's yield, thereby decreasing an investor's real rate of return. (4) *Default Risk* — The risk associated with purchasing a bond from an issuer that later proves unable to meet some (or all) of its obligations. (5) *Downgrade Risk* — The risk associated with rating agencies downgrading an issuer's creditworthiness. This impacts investor confidence in an issuer's ability to repay debt. It may, in turn, increase an issuer's cost to borrow. (6) *Liquidity Risk* — The risk that a bond may not be sold quickly, as there is no readily available market for the bond and/or fewer parties willing to transact.

Cash & Cash Equivalent Risks. Although cash and cash equivalents are generally considered to be among the least volatile investment options, they are not without risk. Such investments are subject to inflation risk, interest rate risk, credit risk, liquidity risk and default risk — the risk that an issuer or financial institution fails to meet its payment obligations. For example, money market mutual funds are designed to maintain a stable net asset value, but are not guaranteed by the Federal Deposit Insurance Corporation (the "FDIC") or any other government agency. It is possible to lose money by investing in such funds. Holding cash or equivalents may reduce overall portfolio volatility. However, maintaining a significant allocation to cash over a prolonged period of time may result in a Client's overall portfolio underperforming broader financial markets or indices during periods of appreciating asset prices. As a result, Clients who maintain substantial cash positions may experience reduced long-term returns and, therefore, may fail to achieve investment objectives. Additionally, returns on cash and cash equivalents are at risk of failing to keep pace with inflation, resulting in a loss of the purchasing power over time.

Short-Term Trading Risks. The Adviser may selectively utilize short-term trading strategies for certain Clients — only when deemed appropriate for such a Client and consistent with any such Client's investment objectives, financial circumstances, risk tolerance, tax considerations and/or the prevailing market conditions. Short-term trading generally involves the purchase and sale of liquid securities over relatively brief periods of time in an effort to capitalize on perceived market opportunities, changes in security valuations, technical indicators or other relevant market developments. Short-term trading involves a higher degree of risk than longer-term investment strategies and may result in increased portfolio turnover. Higher portfolio turnover may increase brokerage commissions, transaction costs, bid-ask spreads and other trading-related expenses, which can reduce overall investment returns. In taxable accounts, frequent trading may also generate short-term capital gains, which are generally taxed at higher rates than long-term capital gains, potentially increasing a client's tax liability. The success of short-term trading depends on the Adviser's ability to predict short-term market movements. Market conditions may change rapidly and unpredictably. There can be no assurance that the Adviser will correctly identify — or react to — such changes. As a result, short-term trading may result in losses, including losses that exceed those associated with a more passive or long-term investment approach. Frequent trading may also increase exposure to market volatility and risk of buying/selling securities at unfavorable prices. The Adviser will determine whether short-term trading is appropriate based on the Client's investment objectives and portfolio strategy. There is no guarantee that any short-term trading strategy will be successful or that it will achieve the client's objectives. Past performance does not guarantee future results. Investing in securities and other investments involves risk of loss that each Client should understand and willfully bear. Clients are reminded to discuss such risks with the Adviser.

ITEM 9

Disciplinary Information

There are no legal, regulatory or disciplinary events involving Reciprocal Wealth or its management. Reciprocal Wealth values the trust of its Clients. The Adviser encourages all of its Clients to perform requisite due-diligence on any financial service-provider that the Client engages. The backgrounds of the Adviser and its Advisory Persons are available on the Investment Adviser Public Disclosure site at www.adviserinfo.sec.gov by searching the name of the firm or its CRD: 342207. Clients may also obtain information on the disciplinary history of any investment adviser representative conducting business in Massachusetts by calling the Commonwealth of Massachusetts Securities Division at 617-727-3548.

ITEM 10

Other Financial Industry Activities & Affiliations

Mr. Chud is also a Director of Enterprise Strategy & Transformation for Keurig Dr. Pepper, Inc. In this role, Mr. Chud serves in the transformation management office with direct reporting responsibility to Chief of Staff to the Chief Executive Officer. Mr. Chud spends approx. 50% of his time in this capacity.

ITEM 11

Code of Ethics, Participation or Interest in Client Transactions & Personal Trading of Securities by Supervised Persons

A. Code of Ethics

Reciprocal Wealth has implemented a **Code of Ethics** (the "Code"), defining the Adviser's fiduciary commitment to each Client. The Code applies to all persons associated with the firm (the "Supervised Persons"). The Code was developed to provide ethical guidelines and specific instructions regarding the Adviser's duties to each Client. Reciprocal Wealth and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Reciprocal Wealth's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the principles guiding the Code. The Code specifically addresses employee ethics and conflicts of interest. To request a copy of the Code, please contact the Adviser at 774-403-5105 or via e-mail at info@reciprocalwealth.com.

B. Personal Trading with Material Interest

Reciprocal Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to — and purchased on behalf of — Clients. Reciprocal Wealth does not act as principal in any transactions. The Adviser does not act as general partner of any fund or advise any investment company. Reciprocal Wealth does not have material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Reciprocal Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to — and purchased on behalf of — Clients. Owning the same securities that are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Adviser has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Reciprocal Wealth's required reporting of personal securities trades executed by its Supervised Persons. This reporting is reviewed by the Chief Compliance Officer ("CCO"). The Adviser has also adopted written policies and procedures to detect misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Reciprocal Wealth allows Supervised Persons to purchase or sell the same securities that may be recommended to — and purchased on behalf of — Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will Reciprocal Wealth, or any current or future Supervised Person of Reciprocal Wealth, transact in any security to the detriment of any Client.

ITEM 12

Brokerage Practices

A. Recommendation of Custodians

Reciprocal Wealth does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein referred to as the "Custodian") to safeguard Client assets and authorize Reciprocal Wealth to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Reciprocal Wealth does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis. Where Reciprocal Wealth does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Adviser and will not incur any extra fee or cost associated with using a custodian not recommended by Reciprocal Wealth. However, the Adviser may be limited in the services it can provide if the recommended Custodian is not engaged by a Client. Reciprocal Wealth may recommend the Custodian based on criteria such as: reasonableness of commissions charged to the Client; services made available to the Client; and its reputation and/or the location of the Custodian's offices. The Adviser will generally recommend that Clients establish their accounts at Altruist Financial LLC ("Altruist"), a FINRA-registered broker-dealer and member SIPC. Altruist will serve as the Client's "qualified custodian." The Adviser maintains an institutional relationship with Altruist, whereby the Adviser receives certain economic benefits. The following provides further detail, regarding brokerage practices of the Adviser: (1) Soft Dollars — Soft dollars are revenue programs offered by certain broker-dealers/custodians whereby an adviser enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. Reciprocal Wealth does not participate in soft dollar programs sponsored or offered by any brokerdealer/custodian. However, the Adviser may receive certain economic benefits from the Custodian. For additional information, please see: **Item 14**. (2) Brokerage Referrals — Reciprocal Wealth does not receive any compensation from third parties in connection with the recommendation to establish an account. (3) Directed Brokerage — All Clients are serviced on a "directed-brokerage basis" in which Reciprocal Wealth places trades through established accounts at the Custodian, as designated by the Client. Further, all Client accounts are traded within such respective accounts. The Adviser will not engage in any principal transactions (i.e. trading of any security to/from the Adviser's own account) or cross-transactions with Client accounts (i.e. purchase of a security in one Client's account and subsequent sale into another Client's account). Reciprocal Wealth will not be obligated to select competitive bids on securities transactions. The firm does not have an obligation to seek the lowest-available transaction costs. Such costs are determined by the Custodian.

B. Aggregating & Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as: price; size of the order; the difficulty of execution; confidentiality; and the skill required of the Custodian. Reciprocal Wealth will execute its transactions through the Custodian as authorized by the Client. Reciprocal Wealth does not aggregate the purchase or sale of securities for Client accounts. Instead, the Adviser trades on an account-by-account basis. Securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Clients' accounts. To mitigate against favoring any advisory account over any other managed account, the Adviser has developed procedures to ensure fair and equitable treatment of trading in Client accounts.

ITEM 13

Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by the Chief Compliance Officer of Reciprocal Wealth. Formal reviews are generally conducted at least annually. Such reviews are conducted more frequently to accommodate the needs and preferences of the firm's Clients.

B. Causes for Reviews

In addition to investment monitoring noted in **Item 13.A.** above, each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of: changes in economic conditions; changes in the Client's financial situation; and/or large deposits or withdrawals in Client accounts. The Client is encouraged to notify Reciprocal Wealth of changes to the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements — no less frequently than every quarter — from the Client's Custodian. These statements are sent directly from Custodian to Client. The Client may also establish electronic access to the Custodian's website to view these reports and account activity. Client brokerage statements will include all positions, transactions and fees relating to Client accounts. The Adviser may also provide Clients with additional periodic reports regarding holdings, allocations and performance.

ITEM 14

Client Referrals and Other Compensation

A. Compensation Received by Reciprocal Wealth

Reciprocal Wealth is a fee-based advisory firm that is compensated solely by its Clients and not from the sale or use of any investment product. Reciprocal Wealth does not receive commissions or any other compensation from product sponsors, broker-dealers or any unrelated third parties. Reciprocal Wealth may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain services necessary to facilitate the goals of its Clients. Likewise, Reciprocal Wealth may receive non-compensated referrals of new Clients from various third-party sources.

Participation in Institutional Advisory Platform. The Adviser established an institutional relationship with Altruist to assist the Adviser in managing Client accounts. The Adviser receives access to software and support because the Adviser renders investment management services to Clients that maintain assets at Altruist. The software and related systems support may benefit the Adviser, but not its Clients directly. In fulfilling its duties to its Clients, the Adviser endeavors, at all times, to put the interests of its Clients first. Clients should be aware, however, that receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Adviser's endorsement of this Custodian over one that does not furnish similar software, support or services.

B. Compensation for Client Referrals

The Adviser does not compensate, either directly or indirectly, any individual, person or persons who are not Supervised Persons in exchange for any Client referrals, introductions or recommendations.

ITEM 15

Custody & Statement Review

Reciprocal Wealth does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Adviser's fees. All Clients must place their assets with a "qualified custodian." Clients are required to engage the Custodian to retain funds and securities and direct Reciprocal Wealth to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare them to reports provided by Reciprocal Wealth to ensure accuracy. For more information about custodians and brokerage practices, see **Item 12 — Brokerage Practices**.

ITEM 16

Investment Discretion

Reciprocal Wealth has discretion over the selection and amount of securities bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines or limitations previously set forth by the Client and agreed to by Reciprocal Wealth. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of a wealth management agreement, containing all applicable limitations to such authority. All discretionary trades made by Reciprocal Wealth are in accordance with each Client's investment objectives and goals.

ITEM 17

Voting Client Securities

Reciprocal Wealth does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Adviser will assist in answering any questions relating to proxy statements. However, the Client retains the sole responsibility for proxy decisions and voting.

ITEM 18

Financial Information

Neither Reciprocal Wealth, nor its management, have any adverse financial situations that would reasonably impair the ability of the firm to meet its obligations to Clients. Neither Reciprocal Wealth, nor any of its Advisory Persons, have been subject to bankruptcy or financial compromise. Reciprocal Wealth is not required to deliver a balance sheet with this Brochure as the Adviser does not collect advance fees of $500-or-greater for services to be performed six (6) months or later in the future.

ITEM 19

Requirements for State Registered Advisers

A. Educational Background and Business Experience of Principal Officer

The Principal Officers of Reciprocal Wealth are John E. Lynch, III and Samuel M. Chud. Information regarding the formal education and background of both of the firm's Principal Officers is included in **Form ADV 2B — Brochure Supplements**, which is attached hereto for convenient review.

B. Other Business Activities of Principal Officer

Mr. Chud is also a Director of Enterprise Strategy & Transformation for Keurig Dr. Pepper, Inc. In this role, Mr. Chud serves in the transformation management office with direct reporting responsibility to Chief of Staff to the Chief Executive Officer. Mr. Chud spends approx. 50% of his time in this capacity.

C. Performance Fee Calculations

Reciprocal Wealth does not charge performance-based fees. The fees it does charge are described above in **Item 5** and such fees are not based on capital appreciation of funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose for Reciprocal Wealth or its Principal Officers. Neither Reciprocal Wealth nor the Principal Officers of Reciprocal Wealth have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Reciprocal Wealth or its Principal Officers. Securities laws require an adviser to disclose any instances in which it — or its advisory persons — are found liable in a legal, regulatory, civil or arbitration matter that alleges: violation of securities law and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting or extortion; and dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Reciprocal Wealth or its Officers.

E. Material Relationships with Issuers of Securities

Neither Reciprocal Wealth nor its Principal Officers have material relationships with securities issuers.

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SECTION

Form ADV: Part 2B — Brochure Supplements

for

John E. Lynch, III — Founder, Principal & Chief Compliance Officer

Effective: July 9, 2026

This Form ADV: Part 2B ("Brochure Supplement") provides information about the background and qualifications of John E. Lynch, III (CRD: 5353387) in addition to the information contained in the Reciprocal Wealth, LLC ("Reciprocal Wealth" or the "Adviser" — CRD: 342207) Disclosure Brochure.

If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Reciprocal Wealth Disclosure Brochure or this Brochure Supplement, please contact us at 774-403-5105 or by e-mail at info@reciprocalwealth.com. Additional information about Mr. Lynch is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or by searching with his Individual CRD Number, which is: 5353387.

ITEM 2

Educational Background & Business Experience

John E. Lynch, III, born in 1985, is dedicated to advising Clients of Reciprocal Wealth as its Founder, Principal & Chief Compliance Officer. Mr. Lynch earned his Bachelor of Arts from Bowdoin College in 2008. Mr. Lynch earned his Master of Business Administration from the University of Virginia's Darden School of Business in 2013. Mr. Lynch's employment history is detailed in the below table.

Employment History

Founder, Principal & Chief Compliance Officer — Reciprocal Wealth, LLC	06/2026 — Present
Portfolio Consultant & Operating Partner — TRIA Capital Partners, LLC	07/2022 — 12/2025
Chief Business Officer — RWA Wealth Partners, LLC (FKA Adviser Investments)	03/2019 — 02/2021
Director & Equity Partner — RWA Wealth Partners, LLC (FKA Adviser Investments)	03/2017 — 02/2019
Director of Business Analysis — RWA Wealth Partners, LLC (FKA Adviser Investments)	03/2015 — 02/2017
Business Operations Analyst III/IV — Navy Federal Credit Union, CFCU	06/2013 — 02/2015

ITEM 3

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Lynch. Mr. Lynch 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. Lynch. Securities laws require an adviser to disclose any instances in which the Adviser or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges: violation of securities laws and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting or extortion; and dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Lynch. However, we do encourage you to independently view the background of Mr. Lynch on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching his full name or his Individual CRD Number: 5353387.

ITEM 4

Other Business Activities

Mr. Lynch is dedicated to the investment advisory activities of Reciprocal Wealth's Clients.
Mr. Lynch does not have any other business activities.

ITEM 5

Additional Compensation

Mr. Lynch is dedicated to the investment advisory activities of Reciprocal Wealth's Clients.
Mr. Lynch does not receive any additional forms of compensation.

ITEM 6

Supervision & Ethics

Mr. Lynch serves as Principal and Chief Compliance Officer of Reciprocal Wealth. Mr. Lynch can be reached at 774-403-5105. Reciprocal Wealth has implemented a Code of Ethics, an internal compliance document, guiding each Supervised Person in meeting fiduciary obligations to Clients of Reciprocal Wealth. Reciprocal Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Reciprocal Wealth and its Supervised Persons. As a registered entity, Reciprocal Wealth is subject to examinations by regulators, which may be announced or unannounced. Reciprocal Wealth must periodically update information provided to regulators and provide reports on business activities.

ITEM 7

Requirements for State Registered Advisers

A. Arbitrations & Regulatory Proceedings

State regulations require disclosure if a Supervised Person of the Adviser 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: an investment or investment-related business or activity; fraud, false statements or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; and 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: an investment or investment-related business or activity; fraud, false statements or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; and dishonest, unfair or unethical practices. Mr. Lynch does not have any disclosures to make for this Item.

B. Bankruptcy

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

SECTION

Form ADV: Part 2B — Brochure Supplements

for

Samuel M. Chud — Founder & Principal

Effective: July 9, 2026

This Form ADV: Part 2B ("Brochure Supplement") provides information about the background and qualifications of Samuel M. Chud (CRD: 8255054) in addition to the information contained in the Reciprocal Wealth, LLC ("Reciprocal Wealth" or the "Adviser" — CRD: 342207) Disclosure Brochure.

If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Reciprocal Wealth Disclosure Brochure or this Brochure Supplement, please contact us at 774-403-5105 or by e-mail at info@reciprocalwealth.com. Additional information about Mr. Chud is available on the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or by searching his Individual CRD Number, which is: 8255054.

ITEM 2

Educational Background & Business Experience

Samuel M. Chud, born in 1986, is dedicated to advising Clients of Reciprocal Wealth as a Founder & Principal. Mr. Chud earned his Bachelor of Business Administration from the Goizueta School of Business at Emory University in 2008. Mr. Chud's employment history is detailed in the below table.

Employment History

Founder & Principal — Reciprocal Wealth, LLC	06/2026 — Present
Director of Enterprise Strategy & Transformation — Keurig Dr. Pepper, Inc.	03/2022 — Present
Director of Commercialization for Drinkworks — Keurig Dr. Pepper, Inc.	04/2018 — 03/2022
Senior Product Manager of Appliances — Keurig Green Mountain, Inc.	01/2017 — 04/2018
Innovation Manager — Keurig Green Mountain, Inc.	09/2015 — 01/2017

ITEM 3

Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Chud. Mr. Chud 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. Chud. Securities laws require an Adviser to disclose any instances in which the Adviser 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 dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Chud. However, we do encourage you to independently view the background of Mr. Chud on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD Number: 8255054.

ITEM 4

Other Business Activities

Mr. Chud is also a Director of Enterprise Strategy & Transformation for Keurig Dr. Pepper, Inc. In this role, Mr. Chud serves in the transformation management office with direct reporting responsibility to Chief of Staff to the Chief Executive Officer. Mr. Chud spends approx. 50% of his time in this capacity.

ITEM 5

Additional Compensation

Mr. Chud has additional business activities where compensation is received as detailed in **Item 4**.

ITEM 6

Supervision & Ethics

Mr. Chud serves as Principal of Reciprocal Wealth and is supervised by John E. Lynch, III, the Chief Compliance Officer. Mr. Lynch can be reached at 774-403-5105. Mr. Chud can be reached at 774-403-5106. Reciprocal Wealth has implemented a Code of Ethics, an internal compliance document, guiding Supervised Persons in meeting fiduciary obligations to Clients of Reciprocal Wealth. Reciprocal Wealth is subject to regulatory oversight by various agencies. These agencies require registration by Reciprocal Wealth and its Supervised Persons. As a registered entity, Reciprocal Wealth is subject to examinations by regulators, which may be announced or unannounced. Reciprocal Wealth must periodically update the information provided to these agencies and provide reports on its business activities and assets.

ITEM 7

Requirements for State Registered Advisers

A. Arbitrations & Regulatory Proceedings

State regulations require disclosure if a Supervised Person of the Adviser 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: an investment or investment-related business or activity; fraud, false statements or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; and 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: an investment or investment-related business or activity; fraud, false statements or omissions; theft, embezzlement or other wrongful taking of property; bribery, forgery, counterfeiting or extortion; and dishonest, unfair or unethical practices. Mr. Chud does not have any disclosures to make for this Item.

B. Bankruptcy

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

SECTION

Privacy Policy

Effective: July 9, 2026

Our Commitment to You

Reciprocal Wealth, LLC ("Reciprocal Wealth" or the "Adviser") is committed to safeguarding any use of the personal information of its Clients (also referred to as "you" and "your") that may be obtained in performing duties as an Investment Adviser, as described in this Privacy Policy (the "Policy").

Our relationship with you is our most important asset. You have entrusted us with your personal and private information — and we do everything in our power to maintain that trust. Reciprocal Wealth (also referred to as "we", "our" and "us") protects the security and confidentiality of any and all personal information that we possess and implements controls to ensure that such information is used for proper business purposes and in connection with the management or servicing of our relationship with you. Reciprocal Wealth does not sell your non-public personal information to anyone. We do not provide any such personal information to others, except for discrete and reasonable business purposes, which are in connection with the service and management of our relationship with you, as further outlined below.

Details of our approach, collection and use of personal non-public information are shared in this Policy.

Why Do You Need to Know?

Registered Investment Advisers (or "RIAs") must share *some* personal information of their Clients in the process of managing accounts and rendering services. Federal and State laws provide you, and all other Clients, with rights to limit aspects of this sharing. These laws also require RIAs to disclose how they collect, share and protect such information, so that Clients of RIAs are informed and aware.

What Information Do We Collect from You?

Driver's License Number	Date of Birth
Social Security or Taxpayer Identification Number	Assets & Liabilities
Name, Address & Phone Numbers	Income & expenses
E-Mail Addresses	Investment Activity
Account Info. (Including at Other Institutions)	Investment Experience & Goals

What Information Do We Collect from Other Sources?

Custody, Brokerage & Advisory Agreements	Account Applications & Forms
Other Advisory Agreements & Legal Documents	Investment Surveys & Suitability Documents
Transactional Information with Us or Others	Other Information Needed to Service Account

How Do We Protect Your Information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How Do We Share Your Information?

An RIA shares Client personal information to effectively implement its services.

In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do We Share?	Can You Limit?
Servicing Client Relationships — Reciprocal Wealth may share non-public personal information with certain unaffiliated third-parties (potentially including administrators, brokers, custodians, regulators, credit agencies and financial institutions) as necessary to provide agreed-upon services to Clients, consistent with applicable law. The reasons for sharing such information include, but are not limited to: transaction processing; general account maintenance; responding to regulators or legal inquiries; and credit reporting.	**Yes.**	**No.**
Marketing Purposes — Reciprocal Wealth does not disclose, and does not intend to disclose, personal information with unaffiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Reciprocal Wealth or the client has a formal agreement with that institution. We only share information for purposes of servicing your accounts, not for marketing purposes.	**No.**	**N/A**
Authorized Users — Your non-public personal information may be disclosed to you and those who we reasonably believe to be your authorized agents or representatives on relevant financial matters.	**Yes.**	**Yes.**
Information About Former Clients — Reciprocal Wealth does not disclose non-public personal information to unaffiliated third parties with respect to persons who are no longer the firm's Clients	**No.**	**N/A**

State-Specific Regulations

Massachusetts	In compliance with Massachusetts law, the Client must "opt-in" to share any non-public personal information with unaffiliated third parties before any personal information may be disclosed. Client opt-in is obtained through: (1) the Client's execution of certain authorization forms provided by the third parties; (2) the Client's execution of an Information Sharing Authorization Form or other written consent of the Client, as appropriate and only when consistent with applicable laws and regulations.

Changes to Our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain a business relationship with us. Periodically, we may revise this Policy and will provide you with an updated Policy if the revisions materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information — other than as described in this notice — unless we first notify you and provide you with advanced opportunity to prevent such information sharing.

Questions & Concerns

You may ask questions, voice concerns and request and obtain a copy of our current Privacy Policy by contacting us — either by telephone at 774-403-5105 or by e-mail at info@reciprocalwealth.com.