

Item 1: Cover Page

Creative Financial Services, Inc.

5825 Delmonico Drive
Suite 320
Colorado Springs, Colorado 80919

Form ADV Part 2A – Firm Brochure

(719) 471-4774

Dated May 17, 2024

www.create-wealth.com

This Brochure provides information about the qualifications and business practices of Creative Financial Services, Inc., “CFS”. If you have any questions about the contents of this Brochure, please contact us at (719) 471-4774. 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.

Creative Financial Services, Inc. is registered as an Investment Adviser with the States of Colorado, Ohio, Texas, and California. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about CFS is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number, 119801.

Item 2: Material Changes

Since the last annual update of this brochure was filed on February 17, 2024, the following changes have been made to this version of the Disclosure Brochure:

- Item 1(Cover Page): We have updated our office address.
- Items 4 & 5: Has been updated to remove GeoWealth Management, LLC, Buckingham Strategic Partners, LLC, and Advyzon Investment Management LLC.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required. Either this complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Creative Financial Services, Inc.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number, 119801.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (719) 471-4774.

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Item 4: Advisory Business

Description of Advisory Firm

Creative Financial Services, Inc. is registered as an Investment Adviser with our home State of Colorado, as well as with the States of Ohio, Texas, and California. We were originally incorporated in Ohio on August 2, 1999. Prior to this date, CFS was not incorporated and operated as a Sole Proprietorship. Jill Isbell is 100% owner of CFS. CFS currently reports \$72,500,000 in discretionary and \$0 non-discretionary Assets Under Management as of December 31, 2023.

Types of Advisory Services

Financial Planning

This service involves working one-on-one with a planner over an extended period of time. By paying a fixed fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, insurance, investments, college planning, and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. Clients subscribing to this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

Investment Management Services (CFS Manages Assets)

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a Client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the Client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure. We may employ a sub-adviser to provide services to our clients. At this time, we use the following sub-advisers:

SEI Investments Company ("SEI")

Our firm recommends that certain clients allocate investment assets among the various mutual funds and exchange traded fund ("ETF") asset allocation models, underlying mutual funds and ETFs, and/or independent investment manager programs offered through SEI Investments Company ("SEI"). SEI is a global asset management company and sponsor of its own proprietary mutual funds. SEI Private Trust Company ("SEI Trust"), a subsidiary of SEI,

serves as custodian for each SEI account (SEI and SEI Trust collectively referred to as “SEI”). SEI provides each client with reporting services, including consolidated monthly statements, quarterly performance reports, and year-end tax reports. SEI enables investment advisers such as our firm to offer our clients mutual fund asset allocation models, underlying individual mutual funds, ETFs, and investment management programs that are not otherwise available to the general public. As part of its overall investment management program, SEI offers quarterly rebalancing of each client’s investment assets for the purpose of maintaining the assets in accordance with the client’s previously designated percentage (%) asset allocations for the SEI account, if elected by the client. If a client desires automatic account rebalancing, he/she must first provide such authorization directly to our firm, who will then advise SEI accordingly. If the client selects a customized model rather than an SEI asset allocation model, the client’s account will not be eligible for automatic rebalancing by SEI. In this case, our firm will provide recommendations for rebalancing based on the client’s goals and objectives. Our firm shall not remove client accounts from SEI to another program without the client’s consent. The fees charged by SEI are exclusive of, and in addition to, our firm’s investment management fee. In addition to our firm’s investment management fee, the client, relative to all mutual fund and ETF purchases, shall also incur charges imposed at the mutual fund level and ETF level (e.g., management fees and other fund expenses).

Our firm intends to primarily allocate investment management assets of our client accounts among various investment management programs offered through SEI Investments Company (“SEI”) and various independent investment managers on a non-discretionary basis in accordance with the investment objectives of our client.

In order for us to manage your assets, you will be required to enter into an investment advisory agreement with CFS and an agreement with SEI. The agreements will set forth the terms and conditions of our relationship, including the amount of your investment advisory fee. You will retain all rights of ownership on your account, including the right to withdraw securities or cash, however CFS may vote proxies. In addition, you will also have the ability to impose restrictions on investing in certain securities or types of securities at the time you open an account.

Educational Seminars

We offer educational seminars for interested parties. They may be provided to companies or tailored for selected employee groups. There is no charge to the participants.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our Clients. However, specific Client financial plans and their implementation are dependent upon the Client Investment Policy Statement which outlines each Client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

We will account for any reasonable restrictions you may require for the management of your investment account(s). Clients may request restrictions, in writing. Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account, by notating these items on the executed advisory agreement.

Wrap Fee Programs

We do not participate in wrap fee programs.

CCR Section 260.235.2 Disclosure

For Clients who receive our Financial Planning services, we must state when a conflict exists between the

interests of our firm and the interests of our Client. The Client is under no obligation to act upon our recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through our firm.

Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

An initial 30-minute consultation for prospective clients will be offered at no charge.

Investment Management Services

Our advisory fee is based on the market value of the assets under management* and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.85%
\$2,000,001 - \$4,000,000	0.75%
\$4,000,001 - \$6,000,000	0.65%
\$6,000,001 - \$10,000,000	0.50%
\$10,000,001 and up	0.25%

For accounts using either SEI or Charles Schwab as the Custodian: The annual fees are negotiable and are prorated and paid in advance on a quarterly basis. The advisory fee is a tiered fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart. The advisory fees are based on the average daily balance over the previous quarter. No increase in the annual fee shall be effective without agreement from the Client by signing a new agreement or amendment to their current advisory agreement.

**A minimum fee of \$8.50 per account, per month will apply for accounts held at SEI or Charles Schwab. This minimum fee is usually covered by the asset-based fee disclosed in the table above.*

Advisory fees are directly debited from Client accounts by CFS.

Accounts initiated or terminated during a billing period will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the client on a prorated basis. If the account is managed by a sub-adviser, the above fee schedule includes the sub-adviser's fee.

Financial Planning -

Financial Planning consists of an onboarding fee and a quarterly subscription for service. The fee may be negotiable in certain cases and reduced or waived if used in conjunction with asset management. Fees for this service may be paid by electronic funds transfer, credit, or check. This service may be terminated with 30 days' notice, there is no refund on the onboarding fee.

Onboarding Fee - \$1,200 + \$4,800 to \$12,500/year based on complexity. This fee will be reduced or waived if combined with investment management services.

Financial Planning – Hourly Fee

Hourly Financial Planning engagements are offered at a rate of \$350 per hour. The fee may be negotiable in certain cases and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be incurred. Fees for this service may be paid by electronic funds transfer or check, or credit card.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

CCR Section 260.238(j) Disclosure

Please note, lower fees for comparable services may be available from other sources.

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

Performance-based fees are fees based on a share of capital gains on or capital appreciation of the assets of a client. Creative Financial Services, Inc. does not offer performance-based fees and does not engage in side-by-side management. CFS assesses a fee based on a percentage of assets. A table of fees is listed in Item 5 of this brochure. If a client has agreed to pay fees based on assets under management, no other fees are expected from the client.

Item 7: Types of Clients

Creative Financial Service, Inc. welcomes the following client types:

- Individuals and Couples
- Small business owners for planning and retirement plans such as SEP, Simple IRA and Solo 401k.
- Trusts and Endowments

Generally, Creative Financial Services Inc. accepts a minimum of \$50,000 to begin an account. There are, however, exceptions to this rule. The following would be examples of the some of the exceptions:

- Business owner beginning a new retirement plan.
- Individual or couple beginning a systematic investment program or annual IRA contribution.

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

Creative Financial Services, Inc. determines, through interviews with the client, a grouping of investments which are most appropriate to reach their goals, time perimeters and risk tolerance.

Understanding the risk tolerance of the client is very important and many times is not immediately known. Many clients believe they have a high degree of risk tolerance, especially in an “up” market. Careful attention is given to realistic risk tolerance when markets begin to correct.

Creative Financial Services has developed asset allocation models based on risk. Our models are categorized as Conservative, Conservative to Moderate, Moderate, Moderately Aggressive, and Aggressive. Our approach to constructing a portfolio is based on diversifying assets in order to take advantage of growth opportunities while balancing risk. Depending on the client’s goals and when they will need to begin pulling money from their portfolio, we will investigate investments which will provide income from a number of different types of vehicles. An example of this would be the use of: varying maturities and credit worthiness of bonds and dividend paying stocks.

Once the portfolio has been invested, the advisors at Creative Financial Services will continue to monitor the progress of the portfolio and will make changes as the markets dictate. We do not practice frequent trading in the accounts under management.

Occasionally a client will suggest an investment that they would like to hold. Creative Financial Services Inc. will research the recommendation and will contact the client with our opinion; outlining the history and potential risks of the investment. We reserve the right to not invest in the recommended stock if it is contrary to the risk tolerance of the client.

Creative Financial Services uses a hybrid approach to investment analysis:

- **Fundamental Analysis:** Fundamental analysis is a method of evaluating a security in an attempt to measure its intrinsic value, by examining related economic, financial and other qualitative and quantitative factors. Fundamental analysts study anything that can affect the security's value, including macroeconomic factors such as the overall economy and industry conditions, and microeconomic factors such as financial conditions and company management. The end goal of fundamental analysis is to produce a quantitative value that an investor can compare with a security's current price, thus indicating whether the security is undervalued or overvalued.
- **Technical Analysis:** Technical analysis is a trading tool employed to evaluate securities and attempt to forecast their future movement by analyzing statistics gathered from trading activity, such as price movement and volume. Unlike fundamental analysts who attempt to evaluate a security's intrinsic value, technical analysts focus on charts of price movement and various analytical tools to evaluate a security's strength or weakness and forecast future price changes.

All investments have some form of risks. Our job at Creative Financial Services is to balance these risks against the goals of our clients.

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain periodic payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirements 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.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Mutual Funds When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur

higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

CFS and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

CFS and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

CFS and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of CFS or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No CFS employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No CFS employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

CFS only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

On occasion a client will need services which are not available at Creative Financial Services, Inc. In this case we will provide the client with a couple of referrals. Creative Financial Services, Inc. does not accept referral fees.

Recommendations or Selections of Other Investment Advisers

CFS utilizes other investment advisers to manage client accounts. In such circumstances, CFS will compensate the other investment adviser out of its asset management fee. This situation creates a conflict of interest. However, when employing another investment adviser, the client's best interest and suitability of the other investment advisers will be the main determining factors of CFS. This relationship is disclosed to the client at the commencement of the advisory relationship. Additionally, CFS will only employ another investment adviser who is properly licensed or registered as an investment adviser.

Disclosure of Material Conflicts

All material conflicts of interest under CCR Section 260.238(k) are disclosed regarding CFS, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.

Item 11: Code of Ethics, Participation or

Interest in Client Transactions and Personal Trading

Creative Financial Services, Inc. is registered in the States of Colorado, Ohio, Texas, and California. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

The company follows the code of ethics as defined by the Financial Planning Association (see below).

Creative Financial Services, Inc. does not have a material financial interest in any investments which are bought or sold in client's account.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation. From time to time, our firm or its "related persons" may buy or sell securities for themselves at or around the same time as Clients.

Code of Ethics Description

These Principles are general statements expressing the ethical and professional ideals our advisors and staff are expected to display in their professional activities.

Principle 1 – Integrity

Provide professional services with integrity.

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Advisors at Creative Financial Services are placed in positions of trust by clients, and the ultimate source of that trust is the advisors' personal integrity. Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity

Provide professional services objectively.

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which an advisor functions, advisors should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence

Maintain the knowledge and skill necessary to provide professional services competently. Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary. Advisors at Creative Financial Services make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness

Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

Principle 5 – Confidentiality

Protect the confidentiality of all client information.

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism

Act in a manner that demonstrates exemplary professional conduct.

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business related activities. Our advisors cooperate with fellow associates to enhance and maintain the profession's public image and improve the quality of services.

Principle 7 – Diligence

Provide professional services diligently.

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Creative Financial Services, Inc. does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

Creative Financial Services, Inc. recommends either Charles Schwab & Co., Inc., or SEI for Custodian services. Creative Financial Services, Inc. is independently owned and operated and not affiliated with Schwab, or SEI.

The Custodian and Brokers We Use (Charles Schwab & Co., Inc.)

Creative Financial Services Inc. (“we”/“our”) does not maintain custody of your assets on which we advise, although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We recommend that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we/you instruct them to. While we recommend that you use Schwab as custodian/broker, you will decide whether to do so and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

How we select brokers/custodians: We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)

- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

Your brokerage and custody costs: For our clients’ accounts that Schwab maintains, Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the uninvested cash in your account in Schwab’s Cash Features Program. In addition to commissions, Schwab charges you a flat dollar amount as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation you pay the executing broker- dealer. Because of this, in order to minimize your trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see “How we select brokers/custodians”).

Products and services available to us from Schwab: Schwab Advisor Services™ is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Schwab’s support services:

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

Services that may not directly benefit you: Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)

- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts
- assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us: Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession

We recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/ custodians") and not Schwab's services that benefit only us.

CFS may also utilize for certain lower asset balance clients the Institutional Intelligent Portfolios™ Program platform sponsored by Schwab Wealth Investment Advisory, Inc. (the "Program" and "SWIA," respectively). SWIA is an unaffiliated SEC registered third party service provider which offers an electronic algorithms platform which ensures client portfolios are aligned with the client's investment objective and risk tolerance via model portfolios. Under this automated investment advisory program, trading and rebalancing is determined via an algorithm based on model portfolios created by CFS, with cash flows and dividends used to keep the portfolio in balance. Also referred to as "robo-advisory services", SWIA provides CFS with the technology platform to automate the management of portfolios of ETFs and mutual fund securities, provides sub-advisory services and acts in a discretionary capacity to the client's account. Any clients that use the Program will receive the SWIA Program Disclosure Brochure ("Program Disclosure Brochure") from SWIA which includes a more detailed description and additional information.

The Custodian and Brokers We Use (SEI)

SEI (NASDAQ: SEIC) is a leading global provider of asset management, investment processing, and investment operations for institutional and personal wealth management. Our products and services help corporations, financial institutions and individuals like you to create and manage wealth. Main office and corporate headquarters are in Oaks, Pennsylvania, USA, near Philadelphia. SEI operates from offices in Canada, Hong Kong, Ireland, the Netherlands, South Africa, Dubai and the United Kingdom.

Your financial advisor has established a relationship with SEI Private Trust Company, a federally chartered, limited purpose savings association that provides custodial and personal trust services. It adheres to extensive federally mandated controls, which are audited by independent and internal auditors and designed to prevent fraudulent activity.

Since SEI Private Trust Company is a trust institution – not a bank or brokerage firm – your assets are segregated from SEI's and they are custodied in your name. This means trust-company creditors have no claim to your assets. Since January 2001, high-net-worth investors have relied on SEI Private Trust Company, in cooperation with their financial advisors, for confidentiality and safekeeping of their assets as they travel to their financial destinations. And we pledge to continue to earn that trust by providing security and safety for your assets at every step along the way.

Aggregating (Block) Trading for Multiple Client Accounts

Creative Financial Services, Inc., when choosing a single equity that will be placed in a number of accounts, will purchase the entire stock purchase in the account of Creative Financial Services, Inc. (in order to get a single price) and then allocate the shares to the various accounts designated. This practice has a two-fold advantage: It becomes easier to track performance and it gives each person who is purchasing this stock a single price, the same as other clients.

Sub-Advisors used by CFS may block Client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Typically, Client accounts are reviewed no less than annually, by either Jill Isbell or Rebecca Miller. This review includes the following:

- Record asset values of accounts compared to the last review
- Investigate each investment choice and look for significant trends
- Evaluate whether an investment should be added to or if a position should be reduced.

A more intense review may be triggered by an upcoming client appointment, if there is a significant change in market conditions or if a client needs to raise funds.

The client receives a monthly statement from Charles Schwab on each account that they hold. Creative Financial Services, Inc. will send our statements generated by client management software, Performance Technologies. Statements are sent out on a quarterly basis coinciding with fees.

Schwab downloads all transactions, pricing, portfolio changes to this software daily. Creative Financial Services also includes a fee statement which includes the value of the account, the percentage which will be deducted and the fee which is deducted from the account.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients.

We receive an economic benefit from Schwab in the form of the support products and services it makes available to us and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit us, and the related conflicts of interest are described above (see Item 12--Brokerage Practices). The availability of Schwab's products and services to us is not based on our giving particular investment advice, such as buying particular securities for our clients.

Item 15: Custody

CFS does not accept custody of Client funds except in the instance of withdrawing Client fees.

For Client accounts in which CFS directly debits their advisory fee:

- i. CFS will send a copy of its invoice to the custodian at the same time that it sends the Client a copy.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The Client will provide written authorization to CFS, permitting them to be paid directly for their accounts held by the custodian.

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct Schwab to deduct our advisory fees directly from your account. Schwab maintains actual custody of your assets. You will receive account statements directly from Schwab at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab. You should carefully review those statements promptly when you receive them. We also urge you to compare Schwab's account statements with the periodic reports you will receive from us. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

As part of the account opening application with Charles Schwab & Co., Inc., clients consent to give Creative Financial Services, Inc. limited discretion to:

- Place trades
- Assess a fees for services based on the Investment Agreement Terms

On occasion, clients will request we hold a particular investment in their account which they have an attachment to. They may also request we hold a particular amount of cash equivalent in their portfolio beyond our recommended allocation. These are limitations clients may put on us as the adviser.

Item 17: Voting Client Securities

Creative Financial Services, Inc. does not vote the security proxies for their clients. The company does receive the voting materials and will, if asked, provide their clients with their opinion on the issues stated in the voting material.

Item 18: Financial Information

Creative Financial Services, Inc. is registered in the state of Colorado as an S Corporation. In regards to soliciting an upfront payment for fees, Creative Financial Services Inc. does not require or solicit a prepayment fee from clients.

Per Rule 51-4.13 (IA)(A)(2) of the Colorado Securities Act, Creative Financial Services Inc. has a minimum of \$10,000 in net worth.

Once a client's money is deposited with Charles Schwab & Co. and is under the care of Creative Financial Services, Inc., we will begin investing the client's money based on the portfolio recommendations that have been discussed with the client. Normally fees are assessed quarterly. The first fee is deducted on the first day of the 2nd quarter; the percentage is based on the last day of the 1st quarter.

CFS will not bill an amount above \$500.00 more than 6 months in advance. We have no financial commitment

that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

Item 19: Requirements for State-Registered Advisers

Jill Isbell

Educational Background, Business Experience, and Other Business Activities are disclosed in Jill Isbell's Brochure Supplement (ADV Part 2B) below.

Performance-Based Fees: CFS is not compensated by performance-based fees.

Material Disciplinary Disclosures: No management person at Creative Financial Services, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities: Creative Financial Services, Inc., nor Jill Isbell, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Supervision: Jill Isbell, as Owner and Chief Compliance Officer of CFS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers: Jill Isbell has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding. Jill Isbell was involved in a bankruptcy petition in 2006, which was satisfied in 2007.

Conflicts of Interest: Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the Client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan: CFS maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Rebecca Miller

Educational Background, Business Experience, and Other Business Activities are disclosed in Rebecca Miller's Brochure Supplement (ADV Part 2B) below.

Performance-Based Fees: CFS is not compensated by performance-based fees.

Material Disciplinary Disclosures: No management person at Creative Financial Services, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities: Creative Financial Services, Inc., nor Rebecca Miller, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Supervision: Jill Isbell, as Owner and Chief Compliance Officer of CFS, is responsible for

supervision. She may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers: Rebecca Miller has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding.

Conflicts of Interest: Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the Client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan: CFS maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Shari Carlson

Educational Background, Business Experience, and Other Business Activities are disclosed in Shari Carlson's Brochure Supplement (ADV Part 2B) below.

Performance-Based Fees: CFS is not compensated by performance-based fees.

Material Disciplinary Disclosures: No management person at Creative Financial Services, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities: Creative Financial Services, Inc., nor Shari Carlson, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Supervision: Jill Isbell, as Owner and Chief Compliance Officer of CFS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers: Shari Carlson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding or administrative proceeding.

Conflicts of Interest: Pursuant to California Code of Regulations Section 260.238 (k) any material conflicts of interest regarding the investment adviser, its representatives or any of its employees are disclosed to the Client prior to entering into any Advisory or Financial Planning Agreement.

Business Continuity Plan: CFS maintains a written Business Continuity Plan that identifies procedures related to an emergency or significant business disruptions, including the death of the investment adviser or any of its representatives.

Creative Financial Services, Inc.

5825 Delmonico Drive
Suite 320
Colorado Springs, Colorado 80919

(719) 471-4774

Dated May 17, 2024

Form ADV Part 2B – Brochure Supplement for Jill Isbell

For

Jill Isbell - Individual CRD# 5351557

Owner and Chief Compliance Officer

This brochure supplement provides information about Jill Isbell that supplements the Creative Financial Services, Inc. (“CFS”) brochure. A copy of that brochure precedes this supplement. Please contact Jill Isbell if the CFS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Jill Isbell is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 5351557.

Item 2: Educational Background and Business Experience

Jill Isbell

Born: 1973

Educational Background

- 2005 – Bachelor’s of Science in Accounting, University of Colorado at Colorado Springs

Business Experience

- 05/2019 – Present, Creative Financial Services, Inc., Owner and CCO
- 06/2021 – 06/2022, Blend Financial Inc. dba Origin Financial, Financial Planner
- 09/2015 - 05/2019, Charles Schwab & Co., VP, Financial Consultant
- 03/2011 - 09/2015, LPL Financial, Registered Representative
- 09/2009 - 02/2011, Edward Jones, Financial Advisor
- 05/2007 - 08/2009, T. Rowe Price Investment Services, Inc., CCG Compliance Associate

Professional Designations, Licensing & Exams

CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.cfp.net.

CFP® professionals have met CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- **Education** – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials.
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- **Experience** – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- **Ethics** – Satisfy the *Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement* and agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct* (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to

remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- **Ethics** – Commit to complying with CFP Board’s *Code and Standards*. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- **Continuing Education** – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the *Code and Standards*.

Item 3: Disciplinary Information

No management person at Creative Financial Services, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Jill Isbell is not involved in any outside activities.

Item 5: Additional Compensation

Jill Isbell does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CFS.

Item 6: Supervision

Jill Isbell, as Owner and Chief Compliance Officer of CFS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Jill Isbell has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Creative Financial Services, Inc.

5825 Delmonico Drive
Suite 320
Colorado Springs, Colorado 80919

(719) 471-4774

Dated May 17, 2024

Form ADV Part 2B – Brochure Supplement for Rebecca Miller

For

Rebecca Miller - Individual CRD# 6556936

Financial Advisor

This brochure supplement provides information about Rebecca Miller that supplements the Creative Financial Services, Inc. (“CFS”) brochure. A copy of that brochure precedes this supplement. Please contact Jill Isbell if the CFS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Rebecca Miller is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 6556936.

Item 2: Educational Background and Business Experience

Rebecca Miller

Born: 1967

Educational Background

- 1989 – Bachelor’s Degree in Human Development & Family Services, Colorado State University

Business Experience

- 07/2014 – Present, Creative Financial Services, Inc., Financial Advisor

Professional Designations, Licensing & Exams

The Accredited Asset Management Specialist (AAMS) is a professional designation awarded by the College for Financial Planning (CFFP) to financial professionals who successfully complete a self-study program, pass an online, closed-book, proctored exam, and agree to comply with a code of ethics.

Successful applicants earn the right to use the AAMS designation with their names for two years. The AAMS consists of 12 modules, starting with a review of the asset management process, and then covering a broad range of topics, such as investments, insurance, taxation, retirement and estate planning issues. 16 hours of continuing education is required every 2 years to maintain the designation.

Item 3: Disciplinary Information

No management person at Creative Financial Services, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Rebecca Miller is not involved in any other business activities.

Item 5: Additional Compensation

Rebecca Miller does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CFS.

Item 6: Supervision

Jill Isbell, as Owner and Chief Compliance Officer of CFS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Rebecca Miller has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Creative Financial Services, Inc.

5825 Delmonico Drive
Suite 320
Colorado Springs, Colorado 80919

(719) 471-4774

Dated May 17, 2024

Form ADV Part 2B – Brochure Supplement for Shari Carlson

For

Shari Carlson - Individual CRD# 7079009

Financial Consultant

This brochure supplement provides information about Shari Carlson that supplements the Creative Financial Services, Inc. (“CFS”) brochure. A copy of that brochure precedes this supplement. Please contact Jill Isbell if the CFS brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Shari Carlson is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 7079009.

Item 2: Educational Background and Business Experience

Shari Carlson

Born: 1988

Educational Background

- 2021 – Master of Nonprofit Management, Regis University
- 2014 – Bachelor of Science in Psychology, Regis University

Business Experience

- 03/2022 – Present, Creative Financial Services, Inc., Financial Consultant
- 02/2020 - Present, Phoenix Fiscal Inc, CEO
- 10/2021 – 12/2022, Collaborative Consulting Group LLC, Managing Member
- 08/2021 - 03/2022, Modern Financial Asset management LLC, Investment Advisor Representative
- 01/2021 - 07/2021, Isaac Financial Services, Administrative Assistant / Business Development
- 01/2021 - 07/2021, Cambridge Investment Research, Administrative Assistant / Business Development
- 03/2019 - 01/2021, Mutual of Omaha Investor Services, Financial Advisor
- 02/2019 - 01/2021, Mutual of Omaha Insurance Company, Agent
- 10/2012 - 02/2019, Vectra Bank Colorado, Relationship Bank
- 07/2012 - 05/2014, Golden Bell Camp and Conference Center, Lead Cook
- 03/2012 - 07/2012, Trustco Bank, Teller

Item 3: Disciplinary Information

No management person at Creative Financial Services, Inc. has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Shari Carlson is involved in the following other business activities, none of which create a conflict of interest or prevent Shari from providing sound advisory services to CFS' advisory clients:

- 09/2019 - Present, DoTerra, Wellness Advocate, not investment-related, Time Spent: 2-3 hours per month, 0 hours per month during trading hours.
- 07/2022 – Present, Balancing Life's Issues, not investment related, Time Spent: 0-8 hours per month.
- 10/2022 – Present, Power Connectors, Board Member, not investment related, Time Spent: 3-5 hours per month.
- 02/2023 – Present, Colorado School District 11, substitute teacher, not investment related, Time Spent: 0-5 hours per month.
- 01/2023 – Present, Harrison School District 2, substitute teacher, not investment related, Time Spent: 0-5 hours per month.
- 01/2023 – Present, S Carlson Care Provider, parent provider community connector, not investment related, Time Spent: 20 hours per month.
- 01/2023 – Present, Women Entrepreneurs Helping Women Entrepreneurs, Not Investment Related, 3-4 Hours Per Month

Item 5: Additional Compensation

Shari Carlson does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CFS.

Item 6: Supervision

Jill Isbell, as Owner and Chief Compliance Officer of CFS, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Shari Carlson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.