



## **Form ADV Part 2A Firm Brochure**

Keating Wealth Management, LLC  
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**Updated: January 10, 2020**

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*This brochure provides information about the qualifications and business practices of Keating Wealth Management, LLC (“Keating Wealth Management,” “We,” “Us,” “Our,” or the “Adviser.”) If you have any questions about the contents of this brochure, please call us at (720) 408-5250. 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. Registration as an investment adviser does not imply a certain level of skill or training. Additional information about Keating Wealth Management, LLC is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our CRD number is: 281406.*

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Form ADV Part 2A

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## **Item 2: Material Changes**

There are no material changes in this brochure from the last annual updating amendment of Keating Wealth Management, LLC on 01/15/2019. Material changes relate to Keating Wealth Management, LLC's policies, practices or conflicts of interests only.

## **Item 3: Table of Contents**

Set forth above.

## **Item 4: Advisory Business**

Keating Wealth Management, LLC ("Keating Wealth Management") is a limited liability company organized in the State of Delaware. The Adviser was formed in March 2014 and began operations in September 2015. The sole owner is Timothy J. Keating (CRD #: 1393098).

We provide investment supervisory services on a discretionary or non-discretionary basis as stated in the Investment Advisory Agreement with each client.

The investment objectives, investment and regulatory restrictions (if any), or other circumstances that guide the supervision of each client's accounts are documented by us in an Investment Policy Statement.

### **Financial Planning and Investment Advisory Services**

We prepare comprehensive, written financial plans for our clients by determining each client's long-term and short-term financial needs and objectives. Financial plans are based on information provided to us by our clients, financial records, responses to our questionnaires and personal interviews.

Financial plans and financial planning services may include, but are not limited to: preparation of a comprehensive statement of financial condition, an asset allocation overview, risk management assessment (including life insurance, disability insurance, and long-term care insurance gap analysis), retirement planning, education planning and estate planning.

With the cooperation and participation of each client, we will typically update each client's financial plan up to three times per year and then conduct a detailed review of the plan with the client.

We design each client's asset allocation and investment portfolio based on a thorough evaluation and analysis of the individual goals and objectives of each client. Following client approval, we implement the changes necessary to create the recommended investment portfolio.

We seek to ensure that investment decisions are made in accordance with the fiduciary duties owed to our clients and without consideration of our economic, investment or other financial interests. To meet our fiduciary obligations, we typically recommend broadly diversified, low cost

and tax efficient index mutual funds or ETFs as the core holdings of each client portfolio. As a general matter, we do not typically recommend or invest in individual securities on behalf of our clients.

A wrap fee program is an investment program where the client pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. We do not participate in any wrap fee programs.

### **Assets Under Management**

As of December 31, 2019, Keating Wealth Management managed a total of \$58,835,984.00 million on behalf of 34 clients.

## **Item 5: Fees and Compensation**

### **Asset-Based Fees for Portfolio Management**

For investment supervisory services, we charge fees based upon the percentage of assets under management. The compensation method is explained and agreed with clients in advance of any services being rendered. The fees for our services are as follows:

<b>Total Assets Under Management</b>	<b>Annual Fee</b>
\$0 to \$5,000,000	1.00%
Above \$5,000,000	Flexible pricing, individually negotiated

Fees are calculated using an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

Under certain circumstances, the fee may be negotiable (and in some cases may be set as a fixed dollar amount), and the final fee schedule is attached as Section II of the Investment Advisory Agreement.

Asset-based portfolio management fees are withdrawn directly from the client's accounts monthly in arrears. The 3-part protocol set forth below must be in place in order for fees to be deducted directly from client accounts:

- (i) The Adviser must possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian.
- (ii) The Adviser must utilize a custodian that sends at least quarterly statements reflecting all additions and deductions, including the amount of advisory fees.
- (iii) The Adviser must send the qualified custodian written notice of the amount of the fee to be deducted and send the client a written invoice upon or prior to fee deduction itemizing the

fee, including the formula used to calculate the fee, the time period covered by the fee, and the amount of assets under management on which the fee was based.

Clients may terminate the agreement without penalty for a full refund of Keating Wealth Management's fees within five business days of signing the Investment Advisory Agreement. Thereafter, clients may terminate the Investment Advisory Agreement generally with 10 days' written notice. If termination becomes effective mid-month, then we will collect only the prorated amount of fees earned for that billing period, based on the number of days elapsed in the month at the point the termination becomes effective.

Financial planning services are included, at no additional cost, as part of the investment advisory services provided by us.

#### **Client Responsibility for Third Party Fees**

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

#### **No Outside Compensation for the Sale of Securities**

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

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

We do not charge or accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

### **Item 7: Types of Clients**

We typically provide investment advisory services to high net worth individuals.

Our minimum account size is typically \$1 million, which may take into consideration multiple accounts aggregated across a single household or family. We have the discretion to waive the account minimum.

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

#### **Methods of Analysis**

We use fundamental analysis to evaluate different asset classes. Fundamental analysis involves: (i) the analysis of historical, long-term, real (i.e., after inflation) rates of return and volatility for each asset class; (ii) an estimation of the risk premium prospectively available for each asset class, and (iii) a comparison of relative valuations across asset classes, based on historical data.

## **Asset Allocation and Investment Strategies**

We create asset allocation strategies and investment portfolios that are typically designed to fund multi-decade, or in certain cases, transgenerational, financial plans.

Our investment portfolios are heavily skewed toward marketable securities (i.e., stocks, bonds and cash), with limited allocations (in certain cases, none) to illiquid securities and alternative funds (e.g., private equity funds, venture capital funds, and hedge funds).

Client portfolios typically include cash (to cover living expenses and for emergencies), bonds (to cover foreseeable capital needs over the next five years), and equities for growth. The equity portion of client portfolios typically include a core holding of equity index funds (or exchange-traded funds) that are broadly diversified, comparatively low in cost, and tax efficient.

## **Material Risks Involved**

All investing involves risk of loss, and you, the client, could lose money over short or even longer time periods. The investment performance of each client's portfolio is affected by the asset allocation of the portfolio, and the investment performance of the underlying funds and securities in the portfolio. There can be no assurance that the investment objective of any client account, or of any client's financial plan as a whole, will be achieved. Certain important risks related to the management of your investment portfolio are described below.

## **Risks of Specific Securities Utilized**

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

**Equities:** Historically, equities have experienced both increased earnings and dividends over time, while mitigating the risk of purchasing power associated with inflation. However, equity securities have volatility that is much higher than other asset classes such as bonds and cash.

**Mutual Funds:** Investing in mutual funds carries the risk of capital loss, and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns.

**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks, and with risks and costs similar to mutual funds.

**Bonds:** Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. Fixed income securities carry interest rate risk, inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties.

**Past performance of any asset class, fund, or individual security is not indicative of future results.**

## **Market Risk**

Long term investing is designed to capture the return of, but also the risk associated with, different asset classes. Due to its nature, a long-term investment strategy will expose clients to the volatility associated with interest rate risk, economic risk, inflation risk, market risk, and political/regulatory risk.

Even a long-term investment approach cannot guarantee a profit. Economic, political, and issuer-specific events of all kinds will cause the value of securities, and the underlying funds that own them, to rise or fall.

**Because the value of your investments will fluctuate, there is the risk that you will lose money. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.**

## **Item 9: Disciplinary Information**

The Adviser and its employees have not been involved in any legal or disciplinary events in the past 10 years that would be material to a client's evaluation of the company or its personnel.

## **Item 10: Other Financial Industry Activities and Affiliations**

Separate from the business of Keating Wealth Management, Timothy J. Keating serves as the Chairman of the Board of Directors of Surna Inc.. This is a publicly traded company. This company is not involved in the financial services business. He devotes less than 5% of his time to board-related duties.

We do not use third party investment managers, and all client assets are managed directly by Keating Wealth Management.

Neither the Adviser nor any of our employees have any affiliations with, or economic interests in, any other firm in the financial services industry.

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

We have adopted a formal code of ethics (the "Code") which covers personal securities transactions and insider trading policies and procedures. Our Code requires, among other things, that employees:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, our clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and the interests of the Adviser above one's own personal interests;



- Adhere to the fundamental standard that an employee should not take inappropriate advantage of his or her position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities; and
- Comply with applicable provisions of the federal securities laws.

We will do everything to mitigate conflicts of interest by (i) disclosing to the client any conflict of interest, and (ii) always acting in the best interest of the client consistent with our fiduciary duty.

All prospective and current clients have a right to see this Code of Ethics, which is available upon request.

We typically do not recommend the purchase or sale of any individual security. Moreover, we do not recommend that clients buy or sell any security in which a person related to Keating Wealth Management, or Keating Wealth Management itself, has a material financial interest.

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

## **Item 12: Brokerage Practices**

Custodians (who may also serve as broker-dealers) will be recommended based on our duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and we may also consider other qualifications. While the custodian may charge commissions to client accounts, we will never charge an additional premium or commission on transactions beyond the actual cost imposed by the broker-dealer/custodian.

We require our clients to use Schwab Institutional, a division of Charles Schwab & Co., Inc. ("Schwab") as custodian and to execute all brokerage transactions through Schwab. We receive no referrals from Schwab (or any other broker-dealer or third party) in exchange for using their services.

We do not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

### **Research and Other Soft-Dollar Benefits**

The term “soft dollars” refers to a means of paying brokerage firms for products and services through commission revenue, based on the volume of brokerage commission revenues generated from securities transactions executed through brokers by an investment manager on behalf of advisory clients.

Section 28(e) of the Securities Exchange Act of 1934, as amended, allows Keating Wealth Management to pay broker-dealers more than the lowest commission available in order to obtain research and brokerage services without breaching its fiduciary duties to clients or imposing a duty upon us to obtain the lowest commission if (i) certain conditions are met, and (ii) we make a good faith determination that the commissions paid are reasonable in relation to the value of the brokerage or research services on behalf of our advisory clients.

In determining if something is research, thus falling within the safe harbor provisions, the controlling principle is whether it provides lawful and appropriate assistance to the investment manager in the performance of its investment decision-making responsibilities.

Keating Wealth Management currently does not maintain soft dollar agreements with Schwab (or any other firm). The services provided by Schwab are completely independent of any commissions generated by us. Therefore, we are not “paying-up” for proprietary research. Moreover, we receive no research, product, or other special services other than execution from Schwab (or any other broker-dealer or third-party) in connection with client securities transactions (“soft dollar benefits”).

## **Item 13: Reviews of Accounts**

### **Trade Errors**

From time to time we may make an error in submitting a trade order on your behalf. When this occurs, we may place a correcting trade with Schwab. For the purpose of reconciling trade errors, we maintain a trade error account with Schwab. If the trade error results in a debit balance, this amount will be resolved immediately. If the trade error results in a credit balance, the amount can either be withdrawn or remain in the account.

### **Portfolio Management Review**

All client accounts are fully reviewed at least quarterly to ensure an appropriate asset allocation is provided based on our assessments of market conditions and the circumstances of each client. We will provide more frequent reviews as appropriate and as agreed with the client. General conditions in the stock and bond markets are continuously monitored. Factors triggering reviews, and perhaps triggering buy or sell recommendations of funds or individual securities, include: (i) changed circumstances of the client, and/or (ii) changed general conditions in the stock and bond markets. All accounts are reviewed by Timothy J. Keating, President.

Clients are kept fully informed about their portfolio activity by receiving copies of all transaction confirmations and monthly statements (or quarterly, if applicable) from Schwab, as the custodian. Clients also receive separate monthly billing statements directly from us.

#### **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 do not directly or indirectly compensate any person, other than employees, for client referrals.

#### **Item 15: Custody**

We do not directly or indirectly hold any client's funds or securities, and we do not have the authority to obtain the possession of, or the ability to appropriate, your funds or securities.

Because advisory fees are deducted directly from client accounts at Schwab, we will be deemed to have limited custody of a client's assets. Please see Item 5 above for additional details regarding our deduction of advisory fees. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

#### **Item 16: Investment Discretion**

We provide discretionary and non-discretionary investment advisory services to our clients. The Investment Advisory Agreement established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, we manage the client's account and make investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share.

#### **Item 17: Voting Client Securities (Proxy Voting)**

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

#### **Item 18: Financial Information**

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

Keating Wealth Management has never filed for bankruptcy and is not aware of any financial condition that is expected to affect our ability to manage client accounts.

## **Item 19: Requirements for State Registered Advisers**

### **Principal Executive Officers and Management Persons**

Keating Wealth Management currently has only one management person: Timothy J. Keating, whose education and business background can be found on his Form ADV Part 2B brochure supplement.

### **Other Businesses**

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

### **No Performance-Based Fees**

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

### **No Material Disciplinary Disclosures**

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

### **No Material Relationships with Issuers of Securities**

Neither Keating Wealth Management, nor its management persons, has any relationship or arrangement with issuers of securities.

*This brochure supplement provides information about Timothy J. Keating that supplements the Keating Wealth Management, LLC brochure. Please contact Timothy J. Keating if you did not receive Keating Wealth Management, LLC's brochure, or if you have any questions about the contents of this supplement.*

*Additional information about Timothy J. Keating is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



**Keating Wealth Management, LLC**  
Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Timothy J. Keating**

Personal CRD Number: 1393098

Investment Adviser Representative

[tim@keatingwealth.com](mailto:tim@keatingwealth.com)

(720) 408-5253

**Keating Wealth Management, LLC**

8400 East Crescent Parkway, Suite 600

Greenwood Village, CO 80111

[www.keatingwealth.com](http://www.keatingwealth.com)

## Item 2: Educational Background and Business Experience

### Timothy J. Keating's Biographical Information

#### Educational Background and Business Experience

Year of Birth: 1963

#### Formal Education after High School

Harvard College - A.B., *cum laude*, 1985

#### Business Background for the Preceding Five Years

August 2015 to Present

President, Keating Wealth Management, LLC

July 2014 to August 2015

President & CEO, BDCA Venture Adviser, LLC (successor to Keating Investments, LLC)

August 1997 to June 2014

President, Keating Investments, LLC

November 1994 to July 1997

Managing Director, Bear Stearns International Ltd.

May 1990 to November 1994

Deputy Managing Director, Nomura International plc

July 1985 to April 1990

Vice President, Kidder, Peabody & Co., Inc.

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Timothy J. Keating is the President of Keating Wealth Management, LLC and oversees all investment counseling.

Mr. Keating has 34 years of Wall Street experience, including 17 years' experience as the principal owner of Keating Investments, LLC, which he founded in 1997.

During its existence, Keating Investments managed three investment funds, including two private funds and a publicly traded closed-end fund focused on pre-IPO investing.

Mr. Keating is the author of numerous white papers on a variety of issues relating to the capital markets, ranging from IPOs to the Yale Endowment model of investing.

He also served on the Equity Capital Formation Task Force, whose members consisted of leaders from America's startup and small-capitalization company ecosystems, and whose report on refueling job creation and growth by reconnecting investors with small-cap companies was presented to the U.S. Department of the Treasury in 2013.

Before founding Keating Investments, Mr. Keating held senior management positions in the Equity and Equity Derivatives departments of Bear Stearns, Nomura and Kidder, Peabody in both London and New York.

He is a 1985 *cum laude* graduate of Harvard College with an A.B. in Economics.

Mr. Keating has been widely quoted in the national media, including publications such as *The Wall Street Journal*, *Forbes*, *Barron's*, *Investor's Business Daily*, *The New York Times*, *USA Today*, *SmartMoney* and the *Venture Capital Journal*. He has been featured on Fox Business' "After the Closing Bell," Bloomberg TV's "Bloomberg West," CNBC's "Street Signs," TheStreet.com and Bloomberg Radio's "Taking Stock" and "The Hays Advantage." Mr. Keating has also been a guest contributor to Forbes.com, *Investment News* and *Pensions & Investments*.

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Separate from the business of Keating Wealth Management, Timothy J. Keating serves as the Chairman of the Board of Directors of Surna Inc.. This is a publicly traded company. This company is not involved in the financial services business. He devotes less than 5% of his time to board-related duties.

### **Item 5: Additional Compensation**

Apart from the fees related to his services as a director of Surna, Inc., Timothy J. Keating does not receive any economic benefit from any person, company, or organization, other than Keating Wealth Management in exchange for providing clients advisory services through Keating Wealth Management.

### **Item 6: Supervision**

As the Chief Compliance Officer of Keating Wealth Management, Timothy J. Keating supervises all activities of the firm, and his contact information is included on the cover page of this disclosure document. Timothy J. Keating adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

## **Item 7: Requirements for State Registered Advisers**

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment adviser representative's suitability.

There are no disciplinary proceedings to report under this section.



*This brochure supplement provides information about Tabitha R. Aspling that supplements the Keating Wealth Management, LLC brochure. Please contact Timothy J. Keating if you did not receive Keating Wealth Management, LLC's brochure, or if you have any questions about the contents of this supplement.*

*Additional information about Tabitha R. Aspling is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



**Keating Wealth Management, LLC**  
Form ADV Part 2B – Individual Disclosure Brochure

*for*

**Tabitha R. Aspling**

Personal CRD Number: 2675614

Investment Adviser Representative

[tabitha@keatingwealth.com](mailto:tabitha@keatingwealth.com)

(720) 408-5253

**Keating Wealth Management, LLC**

8400 East Crescent Parkway, Suite 600

Greenwood Village, CO 80111

[www.keatingwealth.com](http://www.keatingwealth.com)

## **Item 2: Educational Background and Business Experience**

### **Tabitha R. Aspling's Biographical Information**

#### **Educational Background and Business Experience**

Year of Birth: 1972

#### **Formal Education after High School**

University of Nevada, Reno – B.A., 1998

#### **Business Background for the Preceding Five Years**

July 2017 to Present

Operations Director, Keating Wealth Management, LLC

July 2014 to June 2017

Grant & Contracts Management Specialist, University of Nevada, Reno

December 2010 to June 2014

Business Officer, Sage Ridge School

August 2007 to November 2010

Chief Compliance Officer, Keating Securities, LLC

September 2005 to August 2007

Operations Manager, Janco Partners, Inc.

February 2000 to September 2005

Operations Manager, Morgan Stanley

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Tabitha Aspling is the Operations Director of Keating Wealth Management and responsible for client service.

Ms. Aspling has 20 years of Wall Street and related financial services experience.

She began her career at Morgan Stanley in 2000, initially serving as a client liaison for high net worth clients. Ms. Aspling held progressively senior roles at Morgan Stanley over five years, culminating in an Operations Manager position, where her responsibilities included training and supervising administrative staff for a thriving and rapidly growing branch office.

In 2007, Ms. Aspling joined an affiliate of Keating Investments, LLC, where she served as the firm's Financial and Operations Principal. In that capacity, she oversaw all compliance, operational and financial functions.

Ms. Aspling is a 1998 graduate of the University of Nevada, Reno, with a B.A. in History.

### **Item 3: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

### **Item 4: Other Business Activities**

Tabitha R. Aspling is not currently engaged in any outside business activities.

### **Item 5: Additional Compensation**

Tabitha R. Aspling does not receive any economic benefit from any person, company, or organization, other than Keating Wealth Management in exchange for providing clients advisory services through Keating Wealth Management.

### **Item 6: Supervision**

Tabitha R. Aspling is supervised by Timothy J. Keating, Chief Compliance Officer, and his contact information is available on our website. Tabitha R. Aspling adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

### **Item 7: Requirements for State Registered Advisers**

This disclosure is required by state securities authorities and is provided for your use in evaluating this investment adviser representative's suitability.

There are no disciplinary proceedings to report under this section.