CDT CAPITAL WEALTH ADVISORY LLC

FORM ADV PART 2A – FIRM BROCHURE

CRD# 340966

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35 Donna Lane
Syosset, New York 11791
Chief Executive Officer: David Papson (Series 65)

This brochure provides information about the qualifications and business practices of CDT Capital Wealth Advisory LLC ("CDT Capital Wealth," "the Firm," "we," "us," or "our"). If you have any questions about the contents of this brochure, please contact David Papson at the address listed above. 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 the Firm also is available on the SEC's website at www.adviserinfo.sec.gov

ITEM 2 MATERIAL CHANGES

This is the Firm's initial Form ADV Part 2A brochure. In the future, we will provide clients with a summary of material changes within 120 days after the end of our fiscal year and offer the updated brochure upon request.

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ITEM 4 ADVISORY BUSINESS

CDT Capital Wealth Advisory LLC is a limited liability company organized under the laws of the state of Delaware. We are a New York-based investment adviser seeking registration under New York State. David Papson is the Firm's principal owner and owns 60% of the Firm.

Each client's portfolio is managed individually based on the client's financial situation, investment objectives, time horizon, and risk tolerance.

The Firm does not utilize standardized model portfolios. Each portfolio is constructed and managed independently.

The Firm provides comprehensive investment management, financial planning, retirement planning and Estate-Planning Coordination services. The core of our investment management approach is ensuring that each client's portfolio is appropriately aligned with the client's financial objectives and risk tolerance as well as present and future liquidity needs. The Firm provides investment and portfolio recommendations primarily through exchange traded funds, mutual funds, and private investment vehicles. We generally do not recommend individual securities, except with respect to securities already beneficially owned by the client or positions established prior to the commencement of our advisory relationship.

Assets may be managed on both a discretionary and non-discretionary basis.

As of June 1, 2026, the Firm managed approximately $1,905,622 in client assets on a non-discretionary basis and zero client assets on a discretionary basis.

The Firm provides the following services:

- **Investment Management:**

  The Firm provides discretionary and non-discretionary investment management services.

  For discretionary accounts, the client authorizes the Firm to purchase and sell investments without obtaining the client's consent before each transaction, subject to any written restrictions imposed by the client.

  For non-discretionary accounts, the Firm provides investment recommendations, but the client retains final authority over whether and when transactions are executed.

  Investment management services may include:

  - **Reviewing existing holdings:** The Firm reviews the client's current investments to evaluate asset allocation, diversification, investment expenses, liquidity, risk exposure, tax considerations, and consistency with the client's financial objectives.
  - **Developing an appropriate asset allocation:** The Firm recommends an allocation among equities, fixed-income investments, cash equivalents, and precious-metals

exchange-traded products as well as other appropriate investment categories based on the client's objectives, time horizon, liquidity needs, and risk tolerance.

- **Investment selection:** The Firm evaluates and recommends investments that it believes are appropriate for implementing the client's asset allocation and overall financial plan
- **Portfolio monitoring:** The Firm monitors portfolio holdings, performance, asset allocation, liquidity, and risk exposure and evaluates whether changes may be appropriate
- **Portfolio rebalancing:** The Firm may recommend or implement purchases and sales intended to return the portfolio to its target allocation or to reflect changes in market conditions or the client's circumstances.
- **Coordination among accounts:** The Firm considers the client's taxable, tax-deferred, and tax-free accounts together when making investment recommendations and determining the appropriate location of investments.
- **Reviewing portfolios as the client's circumstances change:** The Firm reviews the client's portfolio periodically and when the client's financial circumstances, objectives, risk tolerance, time horizon, or liquidity needs materially change.

The Firm generally provides recommendations involving exchange-traded funds, mutual funds, individual securities, cash equivalents, and, when appropriate, private investment vehicles.

- **Financial Planning**

The Firm provides financial planning services that may address one or more areas of a client's financial life. The scope of services depends on the client's needs and the terms of the advisory agreement.

Financial planning may include:

- **Cash-flow and household budgeting analysis:** The Firm reviews the client's income, recurring expenses, debt obligations, savings, and anticipated expenditures to help the client evaluate current cash flow and establish an appropriate household budget.
- **Savings and investment planning:** The Firm helps the client establish savings priorities, evaluate current savings levels, and determine how available funds may be allocated among emergency reserves, shorter-term needs, and longer-term financial objectives.
- **Analysis of major financial decisions:** The Firm may evaluate the financial effects of decisions such as purchasing a home, refinancing debt, changing employment, receiving an inheritance, making a significant purchase, or funding a major family obligation.
- **Tax-sensitive investment planning:** The Firm considers the potential tax consequences of investment allocation, asset location, withdrawals, and investment transactions when developing recommendations. The Firm does not prepare tax returns or provide tax advice.

- **Education-funding planning:** The Firm assists the client in estimating future education expenses, evaluating existing education savings, and comparing available education-funding strategies and account types.
- **Insurance-needs review:** The Firm reviews the client's existing insurance coverage and discusses whether the amount and type of coverage appear consistent with the client's financial obligations and planning objectives. The Firm does not sell insurance or act as an insurance broker.
- **Equity-compensation analysis:** The Firm reviews restricted stock, stock options, employee stock-purchase plans, vesting schedules, and concentrated employer-stock positions. The Firm may help the client evaluate the financial and investment implications of holding, exercising, or selling equity-compensation interests.

The Firm does not provide legal, accounting, or tax advice. Clients should consult qualified attorneys, accountants, and tax professionals regarding those matters.

- **Retirement Planning Services**

The Firm provides retirement planning services based on the client's needs and the scope of the advisory relationship. These services may include:

- **Estimating retirement-income needs:** The Firm helps the client estimate anticipated living expenses and other financial needs during retirement, including the potential effect of inflation.
- **Savings and contribution analysis:** The Firm evaluates whether the client's current savings and retirement-plan contributions appear sufficient to support the client's retirement objectives.
- **Projecting retirement assets and cash flows**: The Firm helps the client develop a strategy for taking withdrawals from taxable, tax-deferred, and tax-free accounts during retirement.
- **Social Security analysis:** The Firm helps the client compare potential Social Security claiming ages and considers how anticipated benefits may coordinate with other retirement-income sources.
- **Pension and employee-benefit review:** The Firm reviews available pension elections and employer-sponsored retirement benefits as part of the client's overall retirement-income plan.
- **Coordination of retirement and taxable accounts:** The Firm considers the client's employer-sponsored plans, individual retirement accounts, taxable accounts, and other assets together when developing retirement recommendations.
- **Reviewing whether a rollover from an employer-sponsored plan to an IRA is appropriate:** When evaluating a potential rollover from an employer-sponsored retirement plan to an individual retirement account, the Firm considers relevant factors such as fees and expenses, available investment options, services, distribution alternatives, creditor protections, and the client's individual circumstances.

When the Firm recommends a retirement-plan rollover, it considers relevant factors such as fees and expenses, available investment options, services, distribution alternatives, creditor protections, and the client's individual circumstances.

- **Estate-Planning Coordination**

  The Firm may assist clients in identifying financial issues relevant to their estate plans, including:

  - **Reviewing account ownership and beneficiary designations:** The Firm reviews how investment accounts are titled and whether beneficiary designations appear consistent with the client's stated intentions.
  - **Coordinating investment accounts with stated estate-planning objectives**: The Firm helps align investment accounts, asset allocations, and liquidity reserves with the estate-planning objectives communicated by the client and the client's estate-planning attorney.
  - **Wealth-transfer discussions:** The Firm discusses the client's financial objectives concerning gifts, inheritances, charitable giving, and transfers to family members or other beneficiaries.
  - **Coordination with professional advisers:** At the client's request, the Firm may help organize relevant financial information and communicate with the client's attorney, accountant, or other professional adviser.

  The Firm does not draft wills, trusts, powers of attorney, healthcare directives, or other legal documents and does not provide legal advice. Clients are responsible for engaging a qualified attorney to prepare or revise estate-planning documents.

- **Tailoring of Services and Client Restrictions**

  Each client's advisory services and portfolio are tailored to the client's financial circumstances, objectives, risk tolerance, time horizon, liquidity needs, tax considerations, and other relevant factors. Clients may impose reasonable written restrictions on the management of their accounts, including restrictions concerning particular securities, industries, or types of investments.

ITEM 5 FEES AND COMPENSATION

Advisory Fees

The Firm generally charges an annual asset-based advisory fee of 0.50% of the assets under management, billed quarterly in arrears. Advisory fees are calculated using the market value of assets under management as of the final business day of each calendar quarter and are prorated for partial billing periods. The specific fee, billing terms, valuation methodology, and scope of services are set forth in each client's advisory agreement.

Financial planning, retirement planning, and estate-planning coordination are generally provided as part of the Firm's ongoing investment-management services and are included in the applicable asset-based advisory fee. The Firm does not currently charge separate hourly or fixed fees for these services.

Fees may be:

- Deducted directly from client accounts pursuant to written client authorization; or
- Paid by check or electronic transfer payable to CDT Capital Wealth Advisory LLC.

When fees are deducted directly from a client account, the qualified custodian will provide the client with an account statement reflecting the deduction. Clients are encouraged to review their custodial statements and compare the amount deducted with the fee calculation described in their advisory agreement.

The Firm does not charge performance-based compensation.

Other Fees and Expenses:

In addition to the Firm's advisory fee, clients may incur fees and expenses charged by custodians, broker-dealers, mutual funds, exchange-traded funds, private investment vehicles, or other third parties. These charges may include:

- Brokerage commissions;
- Transaction charges;
- Custodial fees;
- Account-maintenance fees;
- Wire-transfer or other administrative fees;
- Mutual-fund and exchange-traded-fund operating expenses; and
- Fees and expenses associated with private investment vehicles.

These fees and expenses are separate from and in addition to the Firm's advisory fee. The Firm does not receive any portion of these third-party charges unless expressly disclosed.

Retirement Rollover Recommendations

When recommending a rollover from an employer-sponsored retirement plan to an IRA, the Firm documents:

- Differences in fees and services;
- Available investment options; and
- Fiduciary acknowledgment requirements.

The Firm complies with Department of Labor PTE 2020-02 Prohibited Transaction Exemption, where applicable.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

The Firm does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

The Firm does not manage any accounts that are charged a performance-based fee alongside accounts that are charged an asset-based fee (commonly referred to as “side-by-side management”).

Because the Firm does not charge performance-based fees or engage in side-by-side management, the conflicts of interest associated with such arrangements do not apply.

ITEM 7 TYPES OF CLIENTS

The Firm provides advisory services to:

- Individuals;
- Families;
- For profit and nonprofit corporate entities.

The Firm does not impose a minimum account size requirement unless otherwise stated in an applicable advisory agreement.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Methods of Analysis

The Firm uses a combination of fundamental analysis, quantitative analysis, and asset-allocation analysis when formulating investment advice and managing client portfolios.

- **Asset-Allocation Analysis**

  Asset-allocation analysis involves determining how a client's portfolio should be divided among asset classes, investment types, and liquidity reserves based on the client's financial circumstances, objectives, time horizon, risk tolerance, and tax considerations.

  Asset allocation and diversification are intended to manage risk but do not guarantee a profit or protect against loss. Different asset classes may decline at the same time, and an allocation that was appropriate when established may become less appropriate as markets or the client's circumstances change.

- **Quantitative Analysis**

  Quantitative analysis involves using financial, market, economic, and statistical data to evaluate investments, portfolio allocations, and risk. The Firm may consider factors such as valuation, historical performance, volatility, correlation, liquidity, earnings trends, interest rates, and other measurable characteristics.

  Quantitative models and historical relationships may not predict future results. Models may rely on incorrect assumptions, incomplete data, or relationships that change during periods of market stress. A quantitative signal may therefore produce an investment recommendation that performs differently than expected.

- **Fundamental Analysis**

  Fundamental analysis involves evaluating the financial condition, operating performance, valuation, competitive position, and prospects of an issuer or investment. The Firm may review financial statements, earnings reports, regulatory filings, economic conditions, industry trends, management commentary, and other publicly available information.

  Fundamental analysis is based on the assumption that the information reviewed is accurate and that the Firm's assessment of an investment's value and prospects is reasonable. However, information may be incomplete, inaccurate, or misleading, and the Firm's conclusions may prove incorrect. An investment believed to be undervalued may remain undervalued or decline further.

Investment Strategies

The Firm generally employs a long-term, diversified investment approach. Portfolios may include exchange-traded funds, mutual funds, cash equivalents, individual securities in limited circumstances, and private investment vehicles when appropriate.

The Firm may recommend:

- Strategic asset allocation;
- Periodic portfolio rebalancing;
- Long-term ownership of investments;
- Maintenance of cash or short-term reserves;
- Tax-sensitive investment decisions;
- Coordination of taxable and retirement accounts; and
- Investment in affiliated or unaffiliated private investment vehicles when appropriate.

The Firm generally does not engage in frequent trading, market timing, short selling, leverage, or derivatives trading for client accounts unless specifically disclosed and authorized.

The Firm's long-term investment approach may result in clients continuing to hold investments during periods of market decline. Rebalancing may cause securities to be sold while they are appreciating or purchased while they are declining. Maintaining cash or short-term reserves may reduce portfolio returns during rising markets. Tax-sensitive decisions may cause a portfolio to retain an investment longer than would otherwise be advisable, and tax consequences may differ from expectations.

Risk of Loss

Investing in securities involves risk of loss. Clients should be prepared to bear potential losses, including total loss of principal.

Risks include, but are not limited to:

- **Market Risk**

  The value of investments may decline because of economic conditions, interest-rate changes, inflation, political events, geopolitical developments, investor sentiment, natural disasters, public-health events, or other market-wide factors. A broad market decline may negatively affect most or all investments in a portfolio.

- **Interest-Rate Risk**

  Changes in interest rates can affect the value of fixed-income securities, equities, real estate-related investments, and other assets. Bond prices generally decline when interest rates rise.

Securities with longer maturities or lower interest rates are generally more sensitive to interest-rate changes.

- **Inflation Risk**

  Inflation may reduce the purchasing power of investment returns and future income. Investments that do not appreciate at a rate exceeding inflation may lose value in real terms.

- **Liquidity Risk**

  Certain investments may be difficult to sell quickly or at a fair price. During periods of market stress, trading may become limited, bid-ask spreads may widen, and an investment may need to be sold at a loss. Private investment vehicles may impose lockups, withdrawal limits, or other restrictions.

- **Credit and Default Risk**

  An issuer or borrower may fail to make required interest or principal payments or may experience a decline in creditworthiness. A deterioration in credit quality may reduce the value of a bond or other fixed-income investment even if the issuer does not default.

- **Manager Risk**

  The investment decisions of the Firm, a mutual-fund manager, ETF sponsor, private-fund manager, or other third-party manager may not achieve the intended results. A manager may make incorrect decisions, fail to respond effectively to changing conditions, or underperform a relevant benchmark.

- **Concentration Risk**

  A portfolio concentrated in a particular issuer, industry, sector, asset class, investment style, or geographic area may experience greater volatility and losses than a more broadly diversified portfolio.

- **Economic and Political Risk**

  Changes in economic growth, employment, regulation, taxation, trade policy, government spending, elections, or political stability may affect investment values. International events may also affect U.S. markets and issuers.

- **Operational and Technology Risk**

  Investment advisers, custodians, issuers, funds, and other service providers may experience systems failures, cybersecurity incidents, data errors, fraud, or operational disruptions. Such events may impair trading, reporting, valuation, or access to client assets.

- **Acts of God and Unforeseen Events**

  Natural disasters, wars, terrorism, pandemics, infrastructure failures, and other unforeseen events may disrupt markets, issuers, custodians, and financial institutions. These events may cause substantial market volatility, reduced liquidity, or loss.

- **Risks of Specific Investment Types**

  ETFs and mutual funds are subject to the risks of their underlying holdings and charge internal expenses. ETFs may also trade above or below net asset value. Individual securities may create greater issuer-specific and concentration risk. Cash may lose purchasing power to inflation and underperform during rising markets. Private investment vehicles may also provide limited transparency, hold concentrated positions, and involve a greater risk of loss than publicly traded investments. Affiliated private investments also create conflicts because related persons may receive fees or other economic benefits.

ITEM 9 DISCIPLINARY INFORMATION

The Firm and its management personnel have no reportable disciplinary events.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

The Firm is under common ownership with CDT Capital Management LLC, an affiliated investment adviser that manages private pooled investment vehicles, including CDT Capital VNAV LLC.

From time to time, the Firm may recommend affiliated products when appropriate for a client's objectives and risk tolerance.

This presents a potential conflict of interest because affiliated entities may receive management fees or performance allocations.

To mitigate this conflict:

- Recommendations must be in the client's best interest;
- Full written disclosure as to the affiliated relationship is provided prior to investment;
- The Firm does not charge its separate asset-based advisory fee on assets invested in affiliated private investment vehicles; however, CDT Capital Management LLC and its related persons may receive fees, performance allocations, or other economic benefits from those vehicles; and
- Advisors do not receive compensation tied to affiliated allocations; and
- The Chief Executive Officer must approve such recommendations.

Clients are not obligated or in any way expected to invest in affiliated companies or products by virtue of entering into an advisory relationship with the Firm.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

The Firm has adopted a written Code of Ethics designed to promote high ethical standards and compliance with applicable securities laws. The Code requires the Firm's supervised persons to act in the best interests of clients, place client interests ahead of their own interests, protect confidential information, identify and disclose conflicts of interest, and comply with applicable federal and state securities laws.

The Code applies to the Firm's supervised persons, including its officers and personnel. The Firm designates as access persons those supervised persons who have access to nonpublic information regarding client holdings, transactions, or investment recommendations, or who are otherwise deemed access persons under applicable law and the Firm's policies. Access persons are subject to the personal-securities reporting, preapproval, and other requirements described below.

Subject to applicable exceptions, access persons are required to report their personal securities holdings and transactions to the Firm. This includes initial and annual holdings reports and quarterly transaction reports. Access persons must also obtain prior approval before acquiring a beneficial interest in an initial public offering or limited offering. Supervised persons are required to acknowledge receipt of the Code and any amendments and promptly report known or suspected violations to the Chief Compliance Officer or another person designated under the Code.

The Firm reviews personal securities activity to identify and address potential conflicts of interest, including the use of confidential information, trading ahead of clients, and personal transactions occurring at or near the time of client transactions. The Firm's policies require that client interests and client transactions receive priority over the personal interests and transactions of the Firm and its personnel. The Firm may use brokerage statements, transaction confirmations, or other records to satisfy applicable reporting requirements where permitted.

The Firm and its related persons may invest in the same securities or related securities that the Firm recommends to clients. This creates a potential conflict because a related person could benefit from a recommendation made to clients or could obtain an advantage by trading before, alongside, or after client transactions. The Firm addresses these conflicts through personal-securities reporting, review of employee and related-person transactions, restrictions on the use of material nonpublic information, and policies designed to prevent personal trading from disadvantaging clients.

The Firm is also under common ownership with CDT Capital Management LLC, which manages affiliated private investment vehicles, including CDT Capital VNAV LLC. The Firm or its related persons may have a financial interest in an affiliated investment recommended to a client. This creates a potential conflict because the Firm's related persons may benefit from management fees, performance allocations, ownership interests, or other compensation associated with the affiliated investment. The Firm addresses this conflict by disclosing the affiliation and related compensation, evaluating whether any recommendation is in the client's best interest, and not requiring clients to invest in affiliated products. Additional information concerning these affiliations is provided in Item 10.

The Firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

ITEM 12 BROKERAGE PRACTICES

Clients are not required to independently evaluate and select a qualified custodian without assistance from the Firm. Clients who wish to retain an existing custodian may do so, provided the custodian can support the Firm's advisory services and trading authority. For clients who request assistance, the Firm will explain the role of a qualified custodian, discuss available custodial options, and assist the client with the account-opening and transfer process.

In evaluating or recommending a custodian, the Firm may consider the custodian's financial condition, reputation, range of available investments, trading capabilities, quality of execution, transaction and account fees, custody and reporting services, technology, cybersecurity controls, customer service, and ability to accommodate the client's account type and needs. The Firm generally recommends Interactive Brokers LLC as its preferred custodian, but clients are not required to use Interactive Brokers and may select another qualified custodian.

When a client selects or directs the use of a particular custodian or broker-dealer, the Firm may be unable to obtain the most favorable execution available through another broker-dealer. The client may pay higher transaction costs, receive less favorable prices, or lose the ability to aggregate transactions with those of other clients.

The Firm seeks best execution for client transactions.

The Firm does not engage in soft-dollar arrangements.

The Firm does not receive brokerage commissions or compensation from custodians.

ITEM 13 REVIEW OF ACCOUNTS

Accounts are reviewed at least annually, and more frequently as market conditions or the client's circumstances warrant, by the Chief Executive Officer.

Reviews assess:

- Asset allocation;
- Strategy alignment;
- Risk exposure; and
- Fee accuracy.

Clients receive account statements directly from their qualified custodians at least quarterly, in accordance with SEC and applicable New York State regulations.

In addition to the account statements that clients receive directly from their qualified custodians at least quarterly, the Firm may periodically provide separate written performance or review reports. Such reports are generally provided annually and may include a summary of holdings, asset allocation, and performance information. Clients should independently compare any reports they receive from the Firm with the statements they receive from their custodians.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

As presently organized, the Firm does not currently enter into referral or solicitor agreements nor does it intend to do so in the near future. The Firm reserves the right, upon disclosure to all current and prospective clients, to enter into referral or solicitor arrangements in compliance with applicable regulations.

If such a referral or solicitor arrangement is entered into by the Firm, clients will receive written disclosure describing:

- Compensation arrangements;
- Nature of the referral; and
- Any conflicts of interest.

The Firm does not currently receive additional compensation beyond advisory fees.

ITEM 15 CUSTODY

Client assets are maintained with qualified custodians selected by the client. The Firm's clients currently maintain assets with custodians that may include Interactive Brokers LLC, Fidelity Investments, Charles Schwab & Co., Inc., and J.P. Morgan Securities LLC.

The Firm does not take physical possession of client funds or securities. The Firm may be deemed to have limited custody solely because it is authorized, pursuant to written client instructions, to deduct advisory fees directly from certain client accounts.

Clients receive account statements directly from their qualified custodian at least quarterly and should review those statements carefully. Clients should compare the statements received from their custodian with any reports or account information received from the Firm.

ITEM 16 INVESTMENT DISCRETION

When explicitly authorized in writing, the Firm may exercise discretionary authority to:

- Buy and sell securities;
- Determine timing of trades; or
- Select investment amounts.

Clients may impose, in writing, reasonable restrictions and limitations of this discretionary authority.

ITEM 17 VOTING CLIENT SECURITIES

The Firm does not vote proxies on behalf of clients.

Clients retain full responsibility for proxy voting decisions.

ITEM 18 FINANCIAL INFORMATION

The Firm does not require prepayment of fees exceeding $1,200 more than six months in advance.

The Firm has no financial condition reasonably likely to impair its ability to meet contractual obligations.

The Firm has not been subject to bankruptcy proceedings.