



1500 N Grant St Ste R  
Denver, CO 80203

**Telephone: 720-460-0351**

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

**June 17, 2026**

## **FORM ADV PART 2A BROCHURE**

This brochure provides information about the qualifications and business practices of Root & Web Community Financial LLC. If you have any questions about the contents of this brochure, contact us at 720-460-0351. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Root & Web Community Financial LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Root & Web Community Financial LLC is 342585.

Root & Web Community Financial LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## **Item 2: Material Changes**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

This brochure is dated May 13, 2026. This is our first brochure and thus there have been no material changes.

We may, at any time, update this brochure and send a copy to you with a summary of material changes, or send you only a summary of material changes that includes an offer to send you a copy of the full brochure either by electronic means (email) or in hard copy form.

For more information about the firm, please call 720-460-0351. Additional information about Root & Web Community Financial LLC and its investment adviser representatives is available on the SEC's website at [www.adviserinfo.scc.gov](http://www.adviserinfo.scc.gov).

**Item 3: Table of Contents**

**Contents**

Item 2: Material Changes .....2

Item 3: Table of Contents .....3

Item 4: Advisory Business .....4

Item 5: Fees and Compensation .....7

Item 6: Performance-Based Fees and Side-By-Side Management.....9

Item 7: Types of Clients .....9

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss .....10

Item 9: Disciplinary Information .....12

Item 10: Other Financial Industry Activities and Affiliations .....12

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....12

Item 12: Brokerage Practices .....13

Item 13: Review of Accounts.....15

Item 14: Client Referrals and Other Compensation .....15

Item 15: Custody .....16

Item 16: Investment Discretion.....16

Item 17: Voting Client Securities.....16

Item 18: Financial Information .....16

Item 19: State-Registered Advisor Information .....16

Form ADV Part 2B Brochure Supplement.....17

#### **Item 4: Advisory Business**

Root & Web Community Financial LLC (“Root & Web,” “we,” “us,” “our,” and “firm”) is a state-registered, fee-only financial planning firm that specializes in providing comprehensive financial planning and investment advisory services to individuals, groups of people, and small business. Root & Web is owned and operated by Margaret Nickens and was founded in 2026. Margaret Nickens also serves as Root & Web’s Chief Compliance Officer. The firm is based in Denver, Colorado. Because this is our initial filing, Root & Web does not have assets under management to declare or disclose on this document.

Root & Web’s advisory services are tailored to meet each client’s (the terms “client,” “you,” and “your” are used throughout this brochure to refer to you as a client or prospective client of our firm) unique investment, risk management, retirement planning, cash management, tax planning, estate planning, business development, loan management, and goal setting needs. We primarily offer advice concerning publicly traded securities and real estate. From time-to-time, we may also advise you on using options and other alternative investments.

**We offer the following advisory services:**

##### ***Ongoing Investment Management***

We are in the business of managing investment portfolios for our clients. At no extra cost and at the client’s election, comprehensive financial planning services will be offered to all investment management clients. Comprehensive financial planning is further described below and is also available as a standalone service.

After we make initial recommendations for client investments, our firm provides continuous ongoing supervisory management and advice to a Client regarding the investment of Client funds based on the individual needs of the Client. We will also review and discuss a Client’s prior investment history, as well as family composition and background. All investment advice is customizable, with each account managed according to the investment objectives, needs, guidelines, risk tolerance, and other information as provided by the Client.

This begins through gathering information from each Client. Based upon information received from the Client, the Firm selects appropriate investment opportunities and invests Client assets in various types of mutual funds, exchange traded funds, or securities. 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 statement or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets.

Investment management services include, but are not limited to, the following:

- Investment Policy and Asset Allocation Strategy
- Individualized Security Recommendations and Implementation
- Regular portfolio monitoring
- Risk Tolerance and Suitability

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.

##### ***Comprehensive Financial Planning***

A comprehensive financial planning engagement includes an initial financial plan as well as ongoing updates and reviews throughout the duration of the client’s engagement. As discussed above,

comprehensive financial planning is available to investment clients at no additional costs as well as a standalone service, the fees for which are described in Item 5.

Root & Web attempts to break down financial planning into manageable pieces to encourage you to follow through with our recommendations and steadily progress toward your financial goals. Clients will typically address four to six key topics during the initial financial plan, depending on their individual financial circumstances. After the initial plan has been delivered and implemented, Root & Web will periodically review and update the financial plan, and the firm will then meet with, call, or email the client in order to discuss updates, revisions, or changes to the financial plan. Meetings are typically conducted by secure remote meeting technology, depending on your availability and preference. The firm offers every financial planning client an annual review meeting. Additional face-to-face, e-mail, and/or phone reviews are included at no additional charge.

Potential Financial Planning Topics: Examples of scheduled meeting topics are listed below. As part of our comprehensive financial planning services, we will schedule meetings to cover topics relevant to your unique financial situation, including some or all of the following, as applicable:

- Investment Strategy and Alignment – The firm will review your investment allocation in light of your risk tolerance, investment objectives, values, and broader market and economic conditions. Root & Web will then provide recommendations for adjusting your portfolio allocation, if necessary, in an effort to achieve your stated investment and savings goals as well as minimize tax drag and expenses.
- Estate Planning – The firm will support you in developing a plan for passing on assets in a tax-efficient manner at the end of your life. This plan may include developing or modifying a trust, Last Will & Testament, Living Will, Healthcare Power of Attorney, Financial Power of Attorney, or other estate planning documents or vehicles.
- Tax Planning – The firm can support you in managing and preparing for capital gains taxes, estate and gift taxes, income tax, self-employment tax, and other forms of taxation. The firm can also support clients in developing a tax-efficient investment strategy, including through the use of Roth conversions.
- Spending Planning – The firm can support you in understanding your spending behaviors, unpacking emotions and shame that may be guiding your spending behaviors, and developing a spending plan that aligns with your long-term goals, values, and dreams.
- Debt Management – The firm can support you in navigating student loans, credit card debt, car loans, mortgages, and other forms of debt. We can assist individuals in developing a plan to mitigate or eliminate their debt as well as with determining if taking on a new form of debt is appropriate given your broader financial circumstances.
- Public Benefits Management, including Social Security Disability Insurance, Social Security retirement benefits, Medicaid, Medicare, and others – The firm can support you with applying for public benefits, understanding what public benefits may be or are currently available to you, and appealing and understanding public benefit decision letters. The firm can also provide support in organizing assets and income in a manner that allows you to access necessary public benefits and avoid or mitigate higher premiums for Medicare.
- Planning for, or managing ongoing, financial emergencies – The firm will support you in developing a plan for saving for and navigating financial emergencies in a manner that does not compromise your broader financial dreams and goals.
- Creative Retirement Planning – The firm will support individuals who are looking to reduce or stop working with planning for and navigating complete or partial retirement. This analysis may include

Monte Carlo simulations, retirement savings distribution planning, cash flow analysis before and after retirement, and other topics.

- Mutual Aid – The firm will support individuals who are interested in mutual aid/charitable giving with tax, investment, and strategy planning. We may discuss and plan for gift and estate plan, consider income tax deductions, consider the options for charitable giving – including through Donor Advised Funds or other vehicles, consider and discuss appropriate timing, and discuss any other important components to your mutual aid and charitable giving plan.
- Risk Management and Insurance – The firm can assess your life, disability, home, car, long-term care, business, and other insurance needs based on the broader facts of your plan. We may discuss the risks associated with different levels of insurance and compare the costs and benefits to different insurance plans.
- Education Planning – Planning for education funding may include discussing and selecting appropriate savings vehicles – such as an UTMA or 529 Plan – and analyzing recommended monthly and/or annual savings amounts. Education planning may also include support in navigating the financial aid process at a collegiate level.
- Equity Compensation – The firm can support individuals in navigating Incentive Stock Options, Restricted Stock Units, and other forms of equity compensation. An equity compensation plan may include analyzing exercise and sale options, planning for taxation of income and/or capital gains. Planning can also include reviewing and understanding offer letters that include equity compensation.
- Real Estate – The firm can support individuals with planning for and navigating the purchase or sale of a personal or investment property. Planning may include analysis of income and capital gains tax, rental income, real estate investment options compared to other investment options, and more.
- Major Purchases – The firm can support individuals in planning and saving for major purchases, such as a home renovation, new car, large vacation, or more.
- Job Transitions – The firm can support individuals with building savings and otherwise planning for a sudden or chosen job change. This planning may include analysis and discussions around emergency funding, public unemployment benefits, salary negotiations, and more.
- Inheritance – The firm can support individuals with understanding probate and estate tax, navigating and planning for required minimum distributions from inherited investment accounts, managing inherited investment accounts, and other topics that may arise.
- Financial Planning with One or More Other People – The firm can support individuals navigating the complexities of sharing your financial life with one or more people. This form of planning may involve support with navigating the emotions, boundaries, and logistics of sharing your financial life with one or more people.
- Having, Adopting, or otherwise Caring for Children – The firm can provide financial planning before or after a new child joins the family. This planning may involve a savings and/or spending plan for childcare, education planning (discussed more above), and otherwise navigating the financial complexities of caring for children.
- Other financial planning and/or financial services as requested or needed by the client.

### ***One-Time Financial Planning***

If a comprehensive financial planning relationship is not desired or practical, we may instead offer to enter into a one-time financial planning agreement. Under this agreement, we will complete an initial financial plan for the client, which often addresses four to six of the key topics listed above. A one-time financial

plan does not include ongoing monitoring or implementation support. It will be the clients' responsibility to implement all recommendations made as part of a one-time financial plan. The service includes 1 client consultation, 1-2 intake sessions, and a final meeting to discuss recommendations. After delivery of our recommendations to the client, a follow-up telephone call, virtual meeting, or email is provided within thirty (30) days to provide further clarification regarding the financial plan. The engagement is then considered complete, and no further update or review of our recommendations is provided (unless we are separately engaged for such additional services and paid an additional fee).

### ***Limited-Scope Offerings***

The firm offers the ability to complete a limited-scope financial analysis of 1-3 topics discussed above. This limited-scope offering includes one pre-meeting to identify the topics of concern followed by a review meeting, which focuses on the firm's recommendations and analysis for the client on the pre-selected topics. Clients are charged on an hourly basis for this offering, the fees for which are discussed further below. The firm will provide an estimate prior to beginning the engagement on the number of hours required to complete this limited-scope plan. Prior to completing work for the client in excess of the initial estimated hours, the firm will advise the client that additional hours are required, and a separate agreement will be signed prior to completing those hours on behalf of the client. Limited-scope financial planning agreements do not include ongoing financial or investment advice. Additionally, limited-scope engagements do not include implementation assistance beyond brief emailing with the firm, offered at our sole discretion, which is limited to providing further clarification regarding the implementation of the actions recommended during the limited-scope engagement.

### ***Educational Presentations, Seminars, and Workshops***

These services consist of educational presentations, seminars, or workshops or other educational events in which Root & Web or its representatives provide financial education to a targeted audience. In some cases, these events are organized exclusively by Root & Web and in others a representative of Root & Web is invited to participate as one of the speakers at a presentation or workshop conducted by another organization, such as a conference, association, or library. Such educational activities do not provide ongoing financial or investment advice or implementation assistance in between sessions or after the conclusion of a series of sessions. It is the firm's policy to not charge for these educational presentations, seminars, and workshops.

### ***Final Notes***

For all engagement types, we will enter into a written advisory agreement with you that details the scope of our advisory relationship, the applicable fees for our services, and the respective rights, obligations, and responsibilities of each party in connection with the engagement. We tailor all advice and services to your stated investment objectives and financial circumstances.

We will discuss with you in detail critically important information such as your risk tolerance, investment experience, time horizon, personal values and goals, and projected future needs, to formulate a customized investment policy. This policy guides us in objectively and suitably managing your account. Clients may impose reasonable restrictions on investing in certain securities or types of securities, subject to the firm's approval. We consider such restrictions when preparing the investment strategy and in making recommendations for your account.

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

We charge advisory fees for our services. The structure of fees depends on the type of services we are engaged to provide. Fees for all services are negotiable. Clients have the ability to terminate the advisory relationship within five days of signing the advisory contract without penalties or fees.

### ***Investment Advisory Fees***

The specific manner in which fees are charged by Root & Web is established in a client's written agreement. Fees for all of our services are negotiable and materially different rates and fee arrangements may be negotiated with individual clients due to factors such as complexity, the client's unique financial needs, relationships with other clients or employees of our firm, our expectation of future assets under advisement/management, and any other factors we deem relevant.

Assets Under Management	Annual Fee
\$ 0 - \$3,000,000	1.00%
\$ 3,000,001 - \$6,000,000	0.75%
\$ 6,000,001+	0.5%

Our fees are payable quarterly, in arrears using the average daily balance of the portfolio value from the billing period. Our clients will generally be required to authorize the account custodian to debit their client account for the amount of our investment advisory fee. At the inception of the relationship and each quarter thereafter, we will notify your custodian of the amount of the fee due and payable to us through our fee schedule and contract. The custodian will then "deduct" the fee from your account(s) or, if you have more than one account, from the account you have designated to pay our advisory fees.

Fees for this service are generally deducted from your custodial account, pursuant to your written authorization. Periodically, but no less than quarterly, you will receive a statement directly from your custodian showing all transactions, positions and credits/debits into or from your account; the statements after the quarter end will reflect these transactions, including the advisory fee paid by you to us.

In addition to the custodial statements, the firm will provide the client with an itemized invoice of the fees, at or about the time those fees are deducted from their custodial account. At the client's request, the firm will provide the data used to calculate the average daily balance of the account. Additional information related to the direct deduction of advisory fees can be found in Item 15 below.

Fees will be prorated for accounts either incepted or terminated in the middle of the billing period, based on the number of days services were provided.

In the event of termination, any fees due to Root & Web from the Client will be debited from an account or paid promptly. The client must provide the advisor with 30 days' written notice in order to terminate the advisory relationship.

### ***Financial Planning Fees***

Financial planning services are billed on a flat-fee or hourly basis. Prior to beginning any financial planning relationship, Root & Web will agree upon a fee with the client via the signing of a financial planning engagement agreement. Investment advisory clients will receive comprehensive financial planning services at no additional cost beyond the advisory fees noted above.

Comprehensive financial planning fees for clients who do not engage our advisory services range from \$2,500 to \$8,000 per year, depending on the complexity of work and other factors. Comprehensive financial planning clients are billed monthly in arrears. Their monthly fee will be 1/12 of their annual fee. The fee for the initial year of financial planning will be higher than future year fees, to reflect the time and work required to complete an initial financial plan.

One-time financial planning fees range from \$1,500 - \$7,000 per plan. Limited-scope financial planning rates range from \$250-\$650 per hour. Root & Web will provide the Client with an estimate of hours required to complete a limited-scope financial plan in advance of beginning the plan. Should additional time be required in order to complete the plan, the client shall be notified, and an additional agreement

must be signed by the client prior to the firm completing additional billable hours. One-time financial planning clients are billed at the completion of services. Limited-scope financial planning clients will pre-select focus areas for their plan from the menu listed in Item 4 above. At the completion of one focus area, the client will be billed for the hours required to complete analysis and review of that focus area. The agreement and billable hours will continue until the completion of all focus areas or until the client terminates the engagement, whichever comes first.

Standalone comprehensive financial planning clients as well as limited-scope and hourly financial planning clients pay their fees via a third-party payment processor or via check. Financial planning clients may terminate the relationship at any time via written notice. The client will be required to pay a prorated portion of the financial planning fee, depending on the amount of work that has been completed prior to receiving the termination notice. The advisor will provide an itemized invoice to financial planning clients at the time they are billed for their services.

As described above, Root & Web is a fee-only financial advisory firm and does not sell investment or insurance products.

### ***Classes and Webinar Fees***

Root & Web will offer classes and webinars on a complimentary basis.

### ***Brokerage and Custodian Fees***

In addition to the advisory fees paid to our firm, subscribers are also responsible for all transaction, brokerage, and custodian fees incurred as part of their account management. All fees paid to Root & Web for investment advisory services are separate and distinct from the fees and expenses charged by custodians and mutual fund companies (described in each fund's prospectus). These fees can include a management fee and other expenses. If the fund also imposes a sales charge, a client could pay an initial or deferred sales charge. Fees paid to Root & Web are exclusive of all custodial and transaction costs paid to account custodian, brokers or other third-party consultants and Root & Web shall not receive any portion of these commissions, fees, and costs. The firm encourages clients to review all fees charged by mutual funds, the custodian, Root & Web and others to fully understand the total amount of fees to be paid by the client.

### ***Retirement Plan Rollovers***

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA") or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If We recommend that a client roll over their retirement plan assets into an account to be managed by the Firm, such a recommendation creates a conflict of interest as We will earn a new (or increase our current) advisory fee as a result of the rollover. We address this conflict of interest by reviewing any such recommendation to ensure it is in the best interest of the client. No client is under any obligation to roll over retirement plan assets to an account managed by Us.

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

Root & Web does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or conduct side-by-side management.

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

Root & Web generally provides portfolio management advice and financial planning services to individuals, groups of people (families, friends, couples, ect.), and businesses.

Root & Web does not impose any condition, such as a minimum account size, in connection with providing advisory services.

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

### ***Methods of Analysis***

When analyzing potential investments and monitoring existing positions, Root & Web uses a comprehensive approach that includes cyclical and fundamental analysis. Utilizing a top-down method that analyzes key macroeconomic variables, Root & Web begins with thorough analysis of the big picture to determine appropriate diversification between sectors, styles of companies, domestic and foreign markets, and more, depending on the broader economic and financial circumstances.

From there, there, analysis of individual companies, mutual funds and exchange-traded funds is used to refine and determine which investments best suit the client's needs. Selection criteria include, but are not limited to, measures of financial health, profitability, sustainable and increasing dividends, and fair value assessments.

The main sources of outside data and professional opinion used by Root & Web in performing its analysis are independent investment research, financial instrument analysis programs, and research provided by the custodian, which is further discussed in Item 12.

Investment recommendations are considered in the context of the client's unique personal circumstances. Specific factors that we may consider when making an investment recommendation include: overall risk tolerance, risk capacity, tax situation, earnings potential, work status, investment experience, financial situation, goals and aspirations, personal values, and individual and family circumstances. After identifying these items, portfolios are structured around individual needs, while minimizing negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

Our primary investment focus for long-term growth of capital and income generation is to achieve an acceptable risk/return trade-off based on the client's unique situation through asset allocation and diversification. Root & Web seeks to educate clients on this risk/return dynamic and the appropriate level of risk for their given situation.

In general, we recommend no-load mutual funds (i.e., mutual funds that have no sales fees), exchange traded funds, U.S. government securities, money market accounts, certificates of deposit, individual bonds (corporate, agency, and municipal), and individual stocks. However, in the course of providing investment advice, we may address issues related to other types of investments that a client may already own or inquire about. Any other products that may be deemed appropriate for a client will be discussed, based upon individual goals, needs, and objectives.

While we use our best judgment and good faith efforts in rendering services to clients, not every investment decision or recommendation made by the firm will be profitable. Investments in securities involve risk of loss that clients should be prepared to bear. Root & Web cannot warrant or guarantee any particular level of account performance, or that an account will be profitable over time. Clients assume all market risk involved and understand that investment decisions are subject to various market, currency, economic, political, and business risks.

Every client's needs and goals are different. Accordingly, investment strategies and underlying investment vehicles may vary. It is the responsibility of each client to give us complete information and to promptly notify us of any changes in financial circumstances or goals. Certain securities laws impose liability under certain circumstances on persons who act in good faith; therefore, the above language does not relieve our firm from any responsibility or liability we may have under state or federal securities laws.

Root & Web's investment strategy is based on the following principles:

- The wisest way to control risk and enhance return is through diversification across several different asset classes.
- The client's time horizon, i.e., the time between now and when the client will need the funds being invested, is a crucial factor affecting tolerance for volatility and risk.
- Root & Web focuses on things that we can control – maintaining a diversified portfolio, reducing expenses, minimizing taxes, and maintaining investment discipline. We do not believe in timing markets or trying to pick winning stocks.

Root and Web's general investment strategies include long-term buy-and-hold with periodic rebalancing of the client's account(s), in conjunction with a proportional equity/fixed-income strategy. The strategy and allocation are determined as appropriate to the financial lifecycle stage, individual considerations, and risk tolerance assessed for each client. As with any investment or strategy, there are risks that must be considered and managed.

### ***ESG Investment Criteria and Philosophy***

At Root & Web, our primary objective is to help our clients achieve their financial goals. Diversification across investment classes is a fundamental element of our investment policy.

It is our policy to selectively integrate ESG considerations into due diligence, monitoring, research analysis, and investment decision making. We recognize that investing based on environmental, social, and governance factors may affect investment performance and may in some situations result in additional risk to our portfolios; however, on balance, we believe that screening with these investment criteria can sometimes enhance overall portfolio quality and reduce the likelihood of companies that we invest in being at risk of litigation, corporate mismanagement, environmental disasters, or stranded assets and thereby may sometimes contribute to lowering overall risk. Root & Web considers a range of relevant factors when making investment decisions, including but not limited to ESG factors when appropriate.

Except as may otherwise be provided by state or federal law, we are not liable to clients for:

- Any loss that a client may suffer by reason of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use;
- Any loss arising from our adherence to a client's instructions; or
- Any act or failure to act by a custodian of a client's account.

### ***Risk of Loss***

Investing in securities involves risk of loss that clients should be prepared to bear. Root & Web continually assesses risk and reward within its investments and utilizes strategies to control for various types of risk; however, there is no guarantee that Root & Web will be able to achieve the stated goals of its managed portfolios. As such, risk factors should be considered before investing. Among others, these include:

- Purchasing Power Risk - The risk that future inflation will cause the purchasing power of cash flow from an investment to fall
- Reinvestment Rate Risk - The risk that falling interest rates will cause the cash flow from an investment to fall when the principal or interest payments of that investment are reinvested at lower rates
- Interest Rate Risk - The risk that a change in interest rates, especially rising rates, will cause the market value of a fixed-income security to fall
- Market Risk - The risk that changes in overall market prices will cause changes in the market value of

a specific security

- Exchange Rate Risk - The risk that an appreciating home-country currency, compared to a foreign currency, will cause an investment in a foreign security denominated in the foreign currency to be worth less, in dollar terms, than what that investment would have been worth if the currency rates had remained stable
- Business Risk - The risk associated with the nature of the business
- Credit Risk - The risk that an enterprise's financial condition will deteriorate, resulting in a downgrading of its debt
- Default Risk - The risk that an enterprise's financial conditions will deteriorate to the point where it will not meet its financial obligations, most commonly illustrated by an issuer of a bond issue not paying interest and/or principal when due.
- Tracking Error Risk – The risk that an exchange traded fund (ETF) will perform differently than the index it is designed to track due to expenses and other factors.
- Liquidity Risk – The risk that you will be unable to liquidate a security at the desired time. Mutual funds carry liquidity risk in that all mutual fund trading occurs once per day at market close.

### **Item 9: Disciplinary Information**

Root & Web and its advisors have never been the subject of any legal or disciplinary action.

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

Margaret Nickens acts as the Chief Compliance Officer for Elm3 Financial Group LLC through the compliance consulting services provided by Root & Web. Margaret Nickens is also a registered investment advisor with Elm3 Financial Group to allow them to complete their responsibilities as Chief Compliance Officer. Elm3 Financial Group LLC is actively engaged in investment management and financial planning activities. Root & Web does not offer its investment advisory or financial planning services to the clients of Elm3 Financial Group LLC nor does it refer its clients to Elm3 Financial Group LLC. As such, the Firm believes Margaret Nickens's role as Chief Compliance Officer for Elm3 Financial Group LLC does not constitute a conflict of interest. Margaret Nickens spends around 50% of their time each month on their compliance consulting services for Elm3 Financial Group LLC.

Margaret Nickens is also a minority owner, but not a control person of, Elm3 CPA Tax & Accounting, LLC ("CPA Tax & Accounting"). Root & Web Financial may refer persons to CPA Tax & Accounting for tax preparation, tax planning, and small business accounting services. When this happens, CPA Tax & Accounting receives an hourly fee as compensation for its services. As part owner, Margaret Nickens could financially benefit from referring clients to CPA Tax & Accounting, and as such, the firm considers there to be a conflict of interest in this relationship. Clients of Root & Web are free to choose any tax preparer and/or accounting service provider. In all situations, Root & Web will always act in the best interest of the client.

Root & Web may refer advisory clients to accountants or legal professionals. Root & Web is not affiliated with any other accountants or legal professionals and does not receive referral fees or any other form of compensation them in exchange for client referrals.

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

#### ***Code of Ethics***

Root & Web follows a strict Code of Ethics which establishes written standards promulgated to deter wrongdoing and to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships
- full, fair, accurate, timely, and understandable disclosure in reports and documents that Root & Web or its affiliates file with, or submits to, the Securities and Exchange Commission (SEC) and in other public communications made by Root & Web
- compliance with governmental laws, rules, and regulations that apply to Root & Web.

This Code of Ethics or any amended version of it will be distributed to all clients or prospective clients of Root & Web and its affiliates upon request. Clients or prospective clients will have the option to request and receive the Code of Ethics in paper or electronic formats.

Root & Web's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Margaret Nickens. It is Root & Web's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Root & Web will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. Root & Web, its employees, and its associated persons are prohibited from front-running or otherwise engaging in trading activities that would disadvantage the trading in client accounts.

### ***Participation or Interest in Client Transactions***

From time to time, Root & Web or a related person of Root & Web may buy or sell securities that it also recommends to clients. To ensure no clients are treated unfairly during these transactions, and all clients are giving equal opportunity to obtain favorable pricing, Root & Web strictly monitors all such trades. Furthermore, Root & Web and its related parties are not allowed to buy and sell securities it recommends to clients if such transaction could directly manipulate the price of the securities. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Root & Web and its clients.

### ***Personal Trading***

At times, the principals and affiliated persons of Root & Web may invest in products recommended to the client. Clients' accounts are always given priority. In any case, Root & Web is too small an investor to noticeably affect the market or to benefit significantly from the client's investing. Regardless, such transactions are monitored to ensure client accounts are not adversely affected. Any thinly traded securities are avoided when trading simultaneously in clients' accounts. Root & Web also has strict oversight of employees' or related person's individually managed accounts outside the firm proper.

## **Item 12: Brokerage Practices**

### ***Recommendation of Brokerage Firms***

Root & Web Financial recommends that clients engage the brokerage and custodial services of a chosen Custodian. When considering what Custodian to recommend, we will choose a Custodian that we believe will provide our clients with expedient, efficient, and low-cost trade processing. We will recommend the Custodian to clients based upon our view of their integrity and financial responsibility and in pursuit of the best execution of orders for client accounts. We never require our clients to utilize any particular

custodian or broker-dealer in order to engage our services. Clients are free to use the custodian of their choosing, whether recommended by us or not.

If the client selects a broker-dealer other than that recommended by our firm (i.e., directed brokerage), you are advised that we may be unable to seek best execution of transactions for your account and your commission costs may be higher than those experienced by clients who have engaged one of our recommended Custodians. For example, in a directed brokerage account, you may pay higher brokerage commissions and/or receive less favorable prices on the underlying securities purchased or sold for your account. In addition, where you direct brokerage, we may place orders for your transactions after we place transactions for clients using our recommended Custodians. We reserve the right to reject your request to use a particular broker-dealer if such selection would frustrate our management of your account, or for any other reason.

### ***Best Execution.***

In recommending broker-dealers, we have an obligation to seek the “best execution” of transactions in your account. This duty requires that we seek to execute securities transactions for clients such that the total costs or proceeds in each transaction are the most favorable under the circumstances. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the recommended Custodian’s services. The factors we will consider when evaluating a broker-dealer for best execution include, without limitation, the Custodian’s:

- execution capability;
- commission rate;
- financial responsibility;
- responsiveness and customer service;
- custodian capabilities;
- research services/ancillary brokerage services provided; and
- any other factors that we consider relevant.

Therefore, we will seek competitive commission rates, but we may not obtain the lowest possible commission rates for specific account transactions.

### ***Block Trading***

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account and the account owner’s Investment Policy Statement, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

We combine multiple orders for shares of the same securities purchased for discretionary accounts; however, we do not combine orders for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you, and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

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

Root & Web does not have any soft-dollar arrangements with custodians whereby soft-dollar credits, used to purchase products and services, are earned directly in proportion to the amount of commissions paid by a Client. However, as a result of being on their institutional platform, the chosen Custodian may provide us with certain services and products that may benefit us. All such soft-dollar benefits are consistent with the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended.

Clients should be aware, however, that the receipt of economic benefits by Root & Web or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of custodian. This conflict of interest is mitigated as Advisor regularly reviews the factors used to select custodians to ensure our recommendation is appropriate.

### **Item 13: Review of Accounts**

Margaret Nickens is responsible for reviewing and assessing financial recommendations made to clients. Factors triggering review may include significant changes in client's financial condition, changes in the fundamentals of the companies or entities issuing securities, price fluctuations, and significant industry or economic developments. Root & Web Financial does not normally change its investment recommendations due to normal market fluctuations absent a significant change in the predetermined investment strategy.

Root & Web Financial owes a fiduciary duty to each client to ensure that all recommendations are in the client's best interest. Root & Web will review the target asset allocation and evaluate whether it continues to be the appropriate asset allocation for the client given their financial situation, stage in the financial lifecycle, risk tolerance, liquidity needs, and other components of their financial situation, such as pensions, inheritances, major anticipated expenses, etc. Once the target asset allocation has been reviewed and/or revised, Root & Web will assess whether the current portfolio is within an acceptable range of this allocation.

Investment Management Services clients receive portfolio recommendations during the term of their engagement with our Firm. Clients are invited to meet with the firm at least annually. More frequent reviews may occur if there are significant changes in the client's financial situation, including lifecycle events, career changes, inheritances, significant increases or decreases in net worth, change in residence, etc.

One-Time Financial Planning and Hourly Financial Planning clients do not receive ongoing account review after their project has been completed.

### ***Portfolio Reports Provided to Clients***

The chosen Custodian will be responsible for providing monthly, quarterly or annual account statements which reflect the positions (and current pricing) in each account as well as transactions in each account, including fees paid from an account. The Custodian will also be responsible for providing confirmation of all trading activity, and year- end tax statements, such as 1099 forms. Root & Web urges you to carefully review such statements.

Those clients contracting only for one-time or limited-scope financial planning will not receive regular reports on their accounts as their engagement agreement expires upon completion of the analysis and payment of the invoice.

### **Item 14: Client Referrals and Other Compensation**

At the current time, Root & Web does not compensate anyone for referrals and does not accept any referral fees when referring a client to another advisor.

### **Item 15: Custody**

It is Root & Web's policy not to take physical custody of client funds or securities. However, Root & Web is deemed to have constructive custody when clients agree to direct deduction of their advisory fees from their custodial account, as described in Item 5 above.

Clients are encouraged to review their periodic statements and compare them to their fee billing invoices. We encourage clients to notify us of any discrepancies noticed.

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

In most cases, Root & Web will provide investment advisory services on a discretionary basis. Before Root & Web assumes discretionary authority over a client's account, the client is required to execute an Agreement, naming Root & Web as client's attorney and agent in fact, granting Root & Web full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account. When exercising this authority, Root & Web can place transaction orders for client accounts without contacting the client on a trade-by-trade basis for advance permission to place the orders.

Clients should be aware that Root & Web may make different recommendations and effect different trades with respect to the same securities to different advisory clients.

Clients who engage Root & Web on a discretionary basis may impose reasonable restrictions on Root & Web's discretionary authority, subject to the Advisor's approval.

### **Item 17: Voting Client Securities**

Root & Web does not vote client proxies. Clients maintain exclusive responsibility for (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client are voted and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings, or other type events pertaining to the client's investment assets.

Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Root & Web to discuss any questions they may have with a particular solicitation.

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

Registered investment advisers are required in some cases to provide certain financial information and or disclosures about their financial condition. Root & Web has no financial or operating conditions which trigger such additional reporting requirements.

Root & Web does not have any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts. Root & Web has not been the subject of a bankruptcy petition.

### **Item 19: State-Registered Advisor Information**

Margaret Nickens is the owner, founder, and Chief Compliance Officer of Root & Web. You can find more information about their educational background, work experience, and outside business activities in the below Part 2B brochure supplement. Additional information related to Root & Web and Margaret Nickens's financial industry affiliations can additionally be found in Item 10 above.

Root & Web does not charge performance-based fees, as is described in Item 6 above.

The firm and its supervised persons have never been the subject of any arbitration claim or disciplinary proceeding, as is reiterated in Item 9 above.

The firm and its supervised persons do not have any material relationship with an issuer of securities.

**Margaret Nickens**

**Root & Web Community Financial LLC**

1500 N Grant St Ste R  
Denver, CO 80203

**Telephone: 720-460-0351**

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

**Form ADV Part 2B Brochure Supplement**

This brochure supplement provides information about Margaret Nickens that supplements the Root & Web Community Financial LLC brochure. You should have received a copy of that brochure. Contact us at 270-460-0351 if you did not receive Root & Web Financial LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Margaret Nickens is available on the SEC's website at <https://adviserinfo.sec.gov>. Their CRD number is 7497497.

## Item 2: Educational Background and Business Experience

Born in 1994, Margaret Nickens attended Brown University and earned their Bachelor of Arts in 2015. In 2026, they founded Root & Web Community Financial LLC. From 2020 through 2026, Margaret served as an investment analyst, financial planner, and investment advisor representative with Elm3 Financial Group. They also served as and continue to serve as Elm3 Financial Group's Chief Compliance Officer, which is further described in Item 4 below. Prior to working with Elm3 Financial Group, Margaret worked as an elementary educator in Denver, Colorado for five years.

Margaret Nickens became a Certified Financial Planner® in 2024.

### CERTIFIED FINANCIAL PLANNER® Professional

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. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- 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.
- 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.

#### *Additional Designations*

Margaret became a National Social Security Advisor (NSSA®) Certificate Holder in 2024. This designation is issued by Social Security Professionals, LLC. To receive the designation, individuals must complete training on Social Security fundamentals, claiming fundamentals, claiming strategies, Medicare fundamentals, and more. Individuals must then pass an 85-question exam and receive a score of 70% or higher. To maintain the designation, individuals must complete 4 hours of NSSA® continuing education each year.

Margaret became a Certified College Financial Consultant in 2026. This designation is issued by the American Institute of Certified College Financial Consultants. To receive the designation, the applicant must attain a prerequisite designation, such as becoming a CFP®. Applicants must then complete coursework related to education funding, tax planning, financial aid advising, and student loan advising as well as complete and pass a final interview examination. Satisfactory responses to three out of the four client case studies in the final interview will result in the candidate passing the exam. Candidates with a CFP® designation are required to complete 4 hours of continuing education each year to maintain the designation.

Margaret became Trauma of Money™ Certified in 2026. This designation — which is issued by Trauma of Money™ — requires candidates to complete an 18-week program on the neurobiology of trauma, somatic healing approaches, financial disorders and disruptions, the racial wealth gap, and more. The TOM™ Certification authorizes candidates to integrate the Trauma of Money™: A Compassionate Approach to Finances Program into their work. Maintaining the designation does not require ongoing continuing education.

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

Margaret Nickens has never been the subject of any legal or disciplinary events.

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

Margaret Nickens acts as the Chief Compliance Officer for Elm3 Financial Group LLC through the compliance consulting services provided by Root & Web. Margaret Nickens is also a registered investment advisor with Elm3 Financial Group to allow them to complete their responsibilities as Chief Compliance Officer. Elm3 Financial Group LLC is actively engaged in investment management and financial planning activities. Root & Web does not offer its investment advisory or financial planning services to the clients of Elm3 Financial Group LLC, nor does it refer its clients to Elm3 Financial Group LLC. As such, the Firm believes Margaret Nickens's role as Chief Compliance Officer for Elm3 Financial Group LLC does not constitute a conflict of interest. Margaret Nickens spends around 50% of their time each month on their compliance consulting services for Elm3 Financial Group LLC.

Margaret Nickens is also a minority owner, but not a control person of, Elm3 CPA Tax & Accounting, LLC ("CPA Tax & Accounting"). Root & Web Financial may refer persons to CPA Tax & Accounting for tax preparation, tax planning, and small business accounting services. When this happens, CPA Tax & Accounting receives an hourly fee as compensation for its services. As part owner, Margaret Nickens could financially benefit from referring clients to CPA

Tax & Accounting, and as such, the firm considers there to be a conflict of interest in this relationship. Clients of Root & Web are free to choose any tax preparer and/or accounting service provider. In all situations, Root & Web will always act in the best interest of the client.

Margaret Nickens has no other financial industry affiliations.

**Item 5: Additional Compensation**

Margaret Nickens does not receive any economic benefits, sales awards, or other compensation in connection with providing advisory services to clients.

**Item 6: Supervision**

Margaret Nickens is the owner, founder, and Chief Compliance Officer of Root & Web Financial LLC. Margaret Nickens will abide by and adhere to all applicable industry rules and regulations in addition to the firm's written supervisory procedures and Code of Ethics. Margaret Nickens can be contacted at 720-460-0351.

**Item 7: State-Registered Advisor Disclosures**

The firm and its supervised persons have never been the subject of any arbitration claim, civil proceeding, or bankruptcy proceeding.

