

Form ADV Part 3: Relationship Summary

Freedom Advisory, LLC

Introduction

Freedom Advisory is an investment adviser registered with the U.S. Securities and Exchange Commission. We offer our clients investment advisory services. Clients should understand that the services we provide and fees we charge are different than those of a broker-dealer, and that it is important to understand the difference between the two. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

What Investment Services and Advice Can You Provide Me?

Description of Services: Freedom Advisory offers the following investment advisory services to retail investors. For more information about our services, please see **Item 4** of our **Form ADV Part 2A**.

Financial Planning & Consulting Services: We provide financial planning and consulting services. Financial planning services involve us creating a written financial plan for you which covers mutually agreed upon topics. Financial consulting is used when a written financial plan is not needed. It involves consultative meetings to discuss your financial situation.

Investment Management Services: We provide investment management services which involves us or selected Separate Account Managers (who we will evaluate, select, and monitor) managing and trading your account(s). We will discuss your investment goals and design a strategy to try and achieve your investment goals. We will continuously monitor your account when providing asset management services and contact you at least annually to discuss your portfolio. Investment management services are provided on a **discretionary** basis, meaning we will have the authority to determine the type and amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. The recommendation of a Separate Account Manager is made on a non-discretionary basis so you will enter into an agreement directly with the unaffiliated Separate Account Managers(s). For more information about investment authority, please see **Item 16** of our **Form ADV Part 2A**.

Limited Investment Offerings: We do not primarily recommend one type of security to clients. Instead, we recommend investment portfolios designed to be suitable for each client relative to that client's specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer's platform. When providing you services, we do not recommend or offer advice on any proprietary products.

Account & Fee Minimums: The minimum fee for financial planning services is \$2,500. We charge a minimum \$1,500 fee for investment management services and the minimum account value to establish an account with us is \$250,000.

Conversation Starters: *Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

What Fees Will I Pay?

Description of Principal Fees & Costs: Fees charged for our Investment Management Services are charged based on a percentage of assets under management, billed in advance on a quarterly calendar basis, and calculated based on the fair market value of your account as of the last business day of the previous billing period. The annual fee for Investment Management Services will be based upon a fee schedule which ranges between 0.25% and 1.25%. Because our fee is based upon the value of your account we have an incentive to recommend that you increase the level of assets in your account. When engaging us for Investment Management Services, you will also incur other fees and expenses. The broker-dealer/custodian on your account will charge you transaction fees for executing trades in your account. You will also be charged internal fees and expenses by the funds we invest in within your account.

We provide financial planning services under a fixed fee arrangement. The minimum fixed fee is generally \$2,500, and the maximum fixed fee is generally no more than \$7,500. We provide financial consulting services under an hourly fee arrangement. An hourly fee of \$250 per hour is charged by us for financial planning services under this arrangement. Any

unpaid hourly fees are due immediately upon completion and delivery of the financial plan. Any fees we charge for financial planning and consulting services will not cover the costs associated with implementing any recommendations we may make.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information about the fees we charge and the other fees and expenses you will incur, please see **Item 5 of Form ADV Part 2A**.

Conversation Starters: *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

**What Are Your Legal Obligations to Me When Acting as My Investment Adviser?
How Else Does Your Firm Make Money and What Conflicts of Interest Do You Have?**

Standard of Conduct: When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. (1) When we provide Investment Management Services, we will ask that you establish an account with Charles Schwab & Company, Inc., BNY Mellon Pershing, or Fidelity Investments to maintain custody of your assets and to effect trades for your account. Our recommendation to use one of these brokerage platforms is not based solely on your interest of receiving the best execution possible. We also recommend them because they provide us with research, products and tools that help us manage and further develop our business operations. As a result, we do not have to pay for such benefits, which save us money; however, these arrangements create a conflict of interest. (2) We actively manage our own personal accounts while at the same time managing your accounts and other client accounts. This creates different conflicts of interest for which we have developed procedures to mitigate and control for those conflicts.

Conversation Starters: *How might your conflicts of interest affect me, and how will you address them?*

Additional Information: For more information about our conflicts of interests and the ways we are compensated, please see **Item 5, Item 10, Item 11, and Item 12** of our **Form ADV Part 2A**.

How Do Your Financial Professionals Make Money?

Description of Salary/Payment of IARs: We compensate our investment adviser representatives with a flat salary and regular bonus which is based, at least in part, on the level of revenue they generate for the firm. This creates a conflict of interest as it gives your representative an incentive to recommend you invest more in your account with us due to the potential for increased payments

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Neither us, nor our investment adviser representatives have a legal or disciplinary history to report. You can look up more information about us and our investment adviser representatives at <https://www.investor.gov/CRS>.

Conversation Starters: *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Additional Information About Freedom Advisory

Additional information about us and a copy of this relationship summary are available on the Internet at <https://freedom-advisory.com/>. You can also find our disclosure brochures and other information about us at <https://adviserinfo.sec.gov/firm/summary/147546>. If you have any questions or want an up-to-date copy of this relationship summary, we can be reached by phone at (787) 792-3000.

Conversation Starters: *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*

Amended Form ADV Part 3 Schedule

Freedom Advisory, LLC Summary of Material Changes Exhibit

February 2026

This is a Summary of Material Changes to our Form ADV Part 3, which describes the material changes since our Form ADV Part 3 was last filed in February 2024. Changes to our Form ADV Part 3 are as follows:

Previous Disclosure:

- (1) When we provide Investment Management Services, we will ask that you establish an account with Charles Schwab & Company, Inc. to maintain custody of your assets and to effect trades for your account. Our recommendation to use Schwab is not based solely on your interest of receiving the best execution possible. We also recommend Schwab because they provide us with research, products and tools that help us manage and further develop our business operations.

New Disclosure:

- (1) When we provide Investment Management Services, we will ask that you establish an account with Charles Schwab & Company, Inc., BNY Mellon Pershing, or Fidelity Investments to maintain custody of your assets and to effect trades for your account. Our recommendation to use one of these brokerage platforms is not based solely on your interest of receiving the best execution possible. We also recommend them because they provide us with research, products and tools that help us manage and further develop our business operations.