

Item 1 – Cover Page

Part 2A of Form ADV



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This Brochure provides information about the qualifications and business practices of Freedom Family Office, LLC. If you have any questions about the contents of this Brochure, please contact us using the information listed above. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Freedom Family Office, LLC (CRD# 310275) is a registered investment advisor with the SEC. Registration of an investment advisor does not imply a certain level of skill or training.

Additional information about Freedom Family Office, LLC is available on the SEC’s website at www.adviserinfo.sec.gov.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this brochure. We will review and update, as needed, our brochure at least annually to make sure that it remains current.

The material changes in this brochure since the last annual updating amendment on April 29th, 2025, are described below.

- *Item 4: Updated to reflect our assets under management as of December 31st, 2025*
- *We have added another custodian, Charles Schwab & Company, Inc.*

Freedom Family Office has made additional non-material updates to other sections in this Brochure, so we encourage each client to review the complete Brochure carefully and to call us with any questions you may have.

If you would like to receive a complete copy of our current brochure free of charge at any time, please contact us at (855) 540-0400 or at ron@freedomfamilyoffice.com.

Additional information about Freedom Family Office, LLC and our investment adviser representatives is available on the SEC's website at <https://adviserinfo.sec.gov/>.

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Advisory Business - Item 4

Freedom Family Office, LLC (hereinafter “FFO”) is a registered investment advisor based in south Florida. We are a limited liability company, organized under the laws of the State of Florida. The Freedom Legacy Trust is the principal owner of FFO.

You may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, an employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly registered as investment adviser representatives.

Currently, we offer the following investment advisory services, personalized for each individual client:

- **Family Office Services**
- **Portfolio Management Services**

Family Office Services

FFO provides family office services that are designed to help families coordinate their multiple forms of capital using a holistic and collaborative team approach combining the many elements inherent to a successful life with wealth. Our collective experiences support our belief that a dedicated team of independent and objective professionals working in collaboration with each other in partnership with the family is the best way to serve families of significant wealth. Such a relationship enhances FFO’s ability to advise families on the opportunities and risks that their wealth presents, allowing families to make better, educated decisions.

Initially, FFO meets with the prospective client to obtain information about their overall situation. This information is used to assist FFO in understanding a client’s needs and the scope of services that are most appropriate for the client’s situation. The family office services FFO will provide will be specifically described in the Family Office Services Agreement you enter into with our firm. Additional services beyond the scope of the Family Office Services Agreement may be provided under separate agreement(s) and may include a separate fee as mutually agreed to by FFO and the client.

Our family office services vary by family and occasionally within families, but may include the following:

- **Portfolio Management Services** – Includes development of asset allocation, ongoing portfolio management, and review, including selection and evaluation of investment managers. Further, we may provide customized performance reporting at the portfolio level and at the manager or specific investment level. Additional information about our portfolio management services is provided in the portfolio management services section below.
- **Information Management and Coordination** – We organize key information and the coordinate such information with the family, the family’s accountant, attorney, insurance agents, and other key advisors.
- **Estate, Gift & Trust Planning** – We provide explanations, summaries, and illustrations of existing and proposed estate planning documents and strategies, including recommendations and education on additional strategies, considerations for making updates periodically and further coordination with family’s tax and legal advisor(s) to implement agreed upon strategies or updates.
- **Income Tax Planning** – Includes planning for the minimization of tax liabilities, including asset location, tax loss harvesting and gain minimization planning, charitable asset selection, facilitation of income tax payments and coordination with family’s tax advisor(s).
- **Financial Planning** – Includes planning related to cash flow analysis, capital sufficiency modeling, lifestyle goals, credit usage, major asset purchases or liquidations, and significant life events.
- **Philanthropic Planning** – Includes defining philanthropic goals, education on philanthropic vehicles and strategies for maximizing the benefits of philanthropy across the family and the organizations they choose to benefit.
- **Education** – Includes both individual and group-based learning sessions around various planning, tax, investment and other topics with an intention of growing not only the family’s financial capital, but non-

financial capital as well. These topics while commonly focused on younger generations are generally available across all generations.

- Family Meetings – Includes facilitation of family meetings often across multiple generations around shared ownership, philanthropy, decision making or shared goals and objectives.
- Assistance with Trust Administration – Includes advice around trustee selection and ongoing guidance, general understanding of trust purposes and provisions. Often, this involves education for grantors, trustees, and beneficiaries on their respective roles and responsibilities.
- Consolidated Reporting Services – Allows the family to customize how their assets are reported by offering a view across multiple accounts or entities in a single statement and/or to segregate assets within accounts. This service may include assets not generally managed by FFO such as closely-held private family assets. This enables the family and their advisors to understand and monitor the total family balance sheet and provide comprehensive and integrated advice from a vantage point inclusive of the family's entire wealth landscape. This may require an additional fee depending on the nature and complexity of the non-managed assets being reported on. Any additional fees will be mutually agreed to in advance.
- Asset Protection Planning and Review – Includes review and discussion of strategies that may avoid or minimize a portion of a family's balance sheet at risk. These strategies will be evaluated on the benefits they may provide against the degree and likelihood of loss and the complexity and administration they may require to achieve such protections.
- Liability Risk Management Planning and Review – Includes advice on a combination of mitigation strategies including the use of special purpose entities, trusts and/or various insurance tools. We will review the family's assets and liabilities to determine: location, titling and ownership structure. We will review existing or proposed policies and, after receiving your permission, we may facilitate reviews with unaffiliated third-party professionals.
- Estate Tax Liquidity Planning and Review – Includes determination of estate tax liquidity needs and determination of potential liquidity sources including asset liquidations and life insurance. We will review existing or proposed policies and, after receiving your permission, we may facilitate reviews with unaffiliated third-party professionals.

The advice we propose is designed to achieve the client's desired goals which may require revision to meet changing circumstances. Our recommendations are based on your situation from the information provided to the firm. Families may choose to accept or reject our recommendations. We should be notified promptly of any change to your situation, goals, objectives, or needs.

Portfolio Management Services

Our firm offers discretionary portfolio management services to our clients. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you. These decisions would be made based upon your stated investment objectives, which will be documented in a written Investment Policy Statement. If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing.

Our investment advice is tailored to meet our clients' needs and investment objectives. If you decide to hire our firm to manage your portfolio, we will meet with you to gather your financial information, determine your goals, and help you decide how to allocate your investments. The information we gather will help us implement an asset allocation strategy that will be specific to your goals, whether we are actively investing for you or simply providing you with advice.

We can advise clients on various types of securities, such as exchange listed equities, over the counter equities, foreign issues, American depository receipts, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (including mutual funds and exchange traded funds), US Government securities, options contracts on securities and/or commodities, private equity instruments, and

interests in partnership investing in real estate. Additionally, will provide advice on existing investments you may hold at the inception of the advisory relationship or on other types of investments for which you ask advice.

If you engage us for portfolio management services, we will monitor your portfolio's performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions and/or your financial circumstances, as guided by your Investment Policy Statement.

Wrap Fee Programs

We do not sponsor, manage, or participate in any wrap fee programs.

Assets Under Management

As of December 31, 2025, we manage approximately \$162,140,871 in client assets on a discretionary basis and approximately \$0 in client assets on a non-discretionary basis.

Important Note: Information related to legal matters that is provided as part of our services is for informative purposes only. Clients are instructed to contact their legal advisers for personalized advice.

Fees and Compensation – Item 5

Family Office Services Fees

For family office services, FFO charges an agreed-upon fixed fee that starts at \$15,000. The fee will increase based on the complexity of the client's financial situation and needs. Family office service fees are negotiated with each family office and can vary greatly based on the needs of each family. Prior to engaging FFO to provide family office services, clients will be required to enter into a written agreement with our firm. This agreement will set forth the terms and conditions of the engagement and will describe the scope of the services to be provided, the agreed upon fixed fee, and the frequency of the payment. Fees are payable in accordance with a payment arrangement that is clearly set forth in the agreement signed by the client and the firm. Invoices are available upon request. Services beyond the scope of the family office services agreement will be billed at a rate of \$500/hour.

Either party may terminate the family office services agreement by written notice to the other. All prepaid, unearned fees will be promptly refunded to the client.

Portfolio Management Services Fees

FFO charges an annual fee of up to 1.50% of the market value of the assets under management for portfolio management services. These fees are based on factors such as the amount of assets, range of investments, and complexity of the client's financial circumstances, among others.

Below is our standard fee schedule; however, it is negotiable. Since this fee is agreed upon with each client, the exact fee paid by the client will be clearly stated in the advisory agreement signed by FFO and the client. We generally impose a minimum monthly fee of \$1,000, which may be waived or discounted at our discretion.

- Amounts up to \$5,000,000 billed at 1.25% per annum.
- Amounts from \$5,000,001 to \$10,000,000 billed 1.00% per annum.
- Amounts from \$10,000,001 to \$20,000,000 billed 0.75% per annum.
- Amounts from \$20,000,001 to \$50,000,000 billed 0.60% per annum.
- Amounts above \$50,000,001 billed 0.50% per annum.

Investment management fees are payable monthly, in arrears. An average of the daily balance in the client's account throughout the billing period is used to determine the market value of the assets upon which the advisory fee is based. Generally, the custodian holding the client's account will deduct FFO's fees and any other custodial fees directly from a designated account to facilitate billing provided the client has given written authorization. The qualified custodian will send an account statement at least quarterly. This statement will detail all account

activity. In limited circumstances, at the sole discretion of FFO, we may agree to invoice you directly for our advisory fee or we may negotiate other fee payment arrangements.

At the inception of services, the first pay period's fees will be calculated on a pro-rata basis. The wealth agreement between the client and FFO will continue in effect until either party terminates the agreement in accordance with the terms of the agreement. FFO's annual fee will be pro-rated through the date of termination. Refunds are not applicable because fees are payable in arrears.

Important Notes Regarding Billing

Billing on Cash Positions: The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

Billing on Margin: Unless otherwise agreed in writing, the gross amount of assets in the client's account, including margin balances, are included as part of assets under management for purposes of calculating the firm's advisory fee. Clients should note that this practice will increase total assets under management used to calculate advisory fees which will in turn increase the amount of fees collected by our firm. This practice creates a conflict of interest in that our firm has an incentive to use margin in order to increase the amount of billable assets. At all times, the firm and its Associated Persons strive to uphold their fiduciary duty of fair dealing with clients. Clients are free to restrict the use of margin by our firm. However, clients should note that any restriction on the use of margin may negatively impact an account's performance in a rising market.

Periods of Portfolio Inactivity: The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

Additional Fees and Expenses

Our fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses. You are responsible for brokerage costs incurred. However, FFO will not receive any portion of the commissions, fees, and costs. Please see Item 12 – Brokerage Practices for further information on brokerage arrangements and transaction costs.

Fees are negotiable based on the amount of assets under management, complexity of client goals and objectives, and level of services rendered. As described above, the fees are charged as described and are not based on a share of capital gains of the funds of any advisory client.

Negotiability of Fees: We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

All fees paid to FFO for investment advisory services are separate and distinct from the fees and expenses charged to shareholders by mutual funds or exchange traded funds. These fees and expenses are described in each fund's

prospectus. These fees generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

A client could invest in a mutual fund directly, without the services of FFO. In this case, the client would not receive the services provided by FFO, which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to their financial condition and objectives. Accordingly, clients should review the fees charged by the funds and the fees charged by FFO to fully understand the total amount of fees charged and to evaluate the cost of advisory services being provided.

We do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

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

Fees are not based on a share of the capital gains or capital appreciation of managed securities. FFO does not use a performance-based fee structure nor "side-by-side" management because of the conflict of interest. Performance based compensation may create an incentive for FFO to recommend an investment that may carry a higher degree of risk to the Client.

Types of Clients & Account Minimums - Item 7

We generally offer investment advisory services to individuals, pension and profit sharing plans and participants, trusts, estates, charitable organizations, corporations, and other business entities.

FFO requires a minimum account size of \$1,000,000 for advisory accounts. However, from time-to-time, in its sole discretion, FFO may accept smaller accounts based on various criteria, such as anticipated future assets, related accounts, and other factors.

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

We may use one or more of the following methods of analysis and/or investment strategies when providing investment advice to you:

- *Fundamental Analysis* – involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The primary risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.
- *Technical Analysis* – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify

when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.

We may use one or more of the following investment strategies when advising you on investments:

- *Long Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.
- *Short Term Purchases* – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.
- *Trading* – securities are sold within 30 days. The principal type of risk associated with trading is market risk. There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies. Additionally, trading is speculative. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.
- *Option Writing* – an option is the right either to buy or sell a specified amount or value of a particular underlying investment instrument at a fixed price (i.e. the "exercise price") by exercising the option before its specified expiration date. Options giving you the right to buy are called "call" options. Options giving you the right to sell are called "put" options. When trading options on behalf of a client, we generally use covered options. Covered options involve options trading when you own the underlying instrument on which the option is based. Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.
- *Margin Transactions* – margin strategies allow an investor to purchase securities on credit and to borrow on securities already in their custodial account. Interest is charged on any borrowed funds for the period of time that the loan is outstanding. When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your broker/dealer. If you intend to borrow funds in connection with your account, you will be required to open a margin account, which will be carried by

the broker/dealer of your account. The securities purchased in such an account are the broker/dealer's collateral for its loan to you. If the securities in a margin account decline in value, the value of the collateral supporting this loan also declines, and, as a result, a brokerage firm is required to take action, such as issue a margin call and/or sell securities or other assets in your accounts, in order to maintain necessary level of equity in the account. It is important that you fully understand the risks involved in trading securities on margin, which are applicable to any margin account that you may maintain, including any Margin Account that may be established as a part of our advisory services and held by your broker/dealer. These risks include the following:

- You can lose more funds than you deposit in your margin account
- The broker/dealer can force the sale of securities or other assets in your account
- The broker/dealer can sell your securities or other assets without contacting you
- You may not be able to choose which securities or other assets in your margin account are liquidated or sold to meet a margin call
- The broker/dealer may move securities held in your cash account to your margin account and pledge the transferred securities
- You may not be entitled to an extension of time on a margin call

Investing in securities involves risk of loss that clients should be prepared to bear.

The investment advice provided along with the strategies suggested by FFO will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering into and the extent of your exposure to risk. Certain investment strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you considering your experience, objectives, financial resources and other relevant circumstances.

Recommendation of Particular Types of Securities: As disclosed under the "Advisory Business" section in this Brochure, we provide advice on various types of securities. We do not necessarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

General Investment Risk: All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk, and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

Loss of Value: There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

Interest Rate Risk: Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

Credit Risk: Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of

a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

Foreign Exchange Risk: Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

Risks Associated with Investing in Equities: Investments in equities generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

Risks Associated with Investing in Mutual Funds: Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

Risks Associated with Investing in Exchange Traded Funds (ETF): ETFs are a type of index fund bought and sold on a securities exchange. The risks of owning an ETF generally reflect the risks of owning the underlying securities they are designed to track, although lack of liquidity in an ETF could result in it being more volatile and ETFs have management fees that increase their costs. ETFs are also subject to other risks, including: (i) the risk that their prices may not correlate perfectly with changes in the underlying reference units; and (ii) the risk of possible trading halts due to market conditions or other reasons that, in the view of the exchange upon which an ETF trades, would make trading in the ETF inadvisable.

Risks Associated with Investing in Private Placement Offerings and Private Funds: Private investment funds are not registered with the Securities and Exchange Commission and may not be registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the client's investment in these companies.

Risks Associated with Alternative Investments: Non-traded REITs, business development companies, limited partnerships, and direct alternatives are subject to various risks such as liquidity and property devaluation based on adverse economic and real estate market conditions and may not be suitable for all investors. A prospectus that discloses all risks, fees and expenses may be obtained from your advisor. Read the prospectus carefully before investing. This is not a solicitation or offering which can only be made in conjunction with a copy of the prospectus. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature and may involve a high degree of risk, particularly if concentrating investments in one or few alternatives investments.

Risks Associated with Investing in Options: Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The

placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

Risks Associated with Investing in Inverse and Leveraged Funds: Leveraged mutual funds and ETFs generally seek to deliver multiples of the daily performance of the index or benchmark that they track. Inverse mutual funds and ETFs generally seek to deliver the opposite of the daily performance of the index or benchmark that they track. Inverse funds often are marketed as a way for investors to profit from, or at least hedge their exposure to, downward-moving markets. Some Inverse funds are both inverse and leveraged, meaning that they seek a return that is a multiple of the inverse performance of the underlying index. To accomplish their objectives, leveraged and inverse funds use a range of investment strategies, including swaps, futures contracts, and other derivative instruments. Leveraged, inverse, and leveraged inverse funds are more volatile and riskier than traditional funds due to their exposure to leverage and derivatives, particularly total return swaps and futures. At times, we will recommend leveraged and/or inversed funds, which may amplify gains and losses.

Most leveraged funds are typically designed to achieve their desired exposure on a daily (in a few cases, monthly) basis, and reset their leverage daily. A "single day" is measured from the time the leveraged fund calculates its net asset value ("NAV") to the time of the leveraged fund's next NAV calculation. The return of the leveraged fund for periods longer than a single day will be the result of each day's returns compounded over the period. Due to the effect of this mathematical compounding, their performance over longer periods of time can differ significantly from the performance (or inverse performance) of their underlying index or benchmark during the same period of time. For periods longer than a single day, the leveraged fund will lose money when the level of the Index is flat, and the leveraged fund may lose money even if the level of the Index rises. Longer holding periods, higher index volatility, and greater leverage all exacerbate the impact of compounding on an investor's returns. During periods of higher Index volatility, the volatility of the Index may affect the leveraged fund's return as much as or more than the return of the Index itself. Therefore, holding leveraged, inverse, and leveraged inverse funds for longer periods of time increases their risk due to the effects of compounding and the inherent difficulty in market timing. Leveraged funds are riskier than similarly benchmarked funds that do not use leverage. Non-traditional funds are highly volatile and not suitable for all investors. They provide the potential for significant losses.

Risks Associated with Investing in Buffer ETFs: Buffer ETFs are also known as defined-outcome ETFs since the ETF is designed to offer downside protection for a specified period of time. These ETFs are modeled after options-based structured notes, but are generally cheaper, and offer more liquidity. Buffer ETFs are designed to safeguard against market downturns by employing complex options strategies. Buffer ETFs typically charge higher management fees that are considerably more than the index funds whose performance they attempt to track. Additionally, because buffer funds own options, they do not receive dividends from their equity holdings. Both factors result in the underperformance of the Buffer ETF compared to the index they attempt to track. Clients should carefully read the prospectus for a buffer ETF to fully understand the cost structures, risks, and features of these complex products.

Cybersecurity Risk. FFO and its service providers may be subject to operational and information security risks resulting from cyberattacks. Cyberattacks include, among other behaviors, stealing or corrupting data maintained online or digitally, denial of service attacks on websites, the unauthorized release of confidential information or various other forms of cybersecurity breaches. Cybersecurity attacks affecting FFO and its service providers may adversely impact Clients. For instance, cyberattacks may interfere with the processing of transactions, cause the release of private information about Clients, impede trading, subject FFO to regulatory fines or financial losses, and cause reputational damage. Similar types of cybersecurity risks are also present for issuers of securities in which Clients may invest in, qualified custodians, governmental and other regulatory authorities, exchange and

other financial market operators, or other financial institutions. Cybersecurity incidents that could ultimately cause them to incur losses, including for example: financial losses, cost and reputational damages, and loss from damage or interruption of systems. Although FFO has established its systems to reduce the risk of these incidents from coming to fruition, there is no guarantee that these efforts will always be successful, especially considering that FFO does not directly control the cybersecurity measures and policies employed by third party service providers.

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment with FFO.

Disciplinary Information - Item 9

FFO and its management have not been involved in any criminal or civil actions, administrative or self-regulatory enforcement proceedings, nor any legal or disciplinary events that are material to a Client's or prospective Client's evaluation of FFO or the integrity of its management.

Other Financial Industry Activities or Affiliations - Item 10

Registration as a Broker-Dealer or Broker-Dealer Representative

Neither FFO nor its management persons are registered as a broker-dealer or broker-dealer representative.

Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither FFO nor its management persons are registered as futures commission merchant, commodity pool operator, or a commodity trading advisor.

Relationships Material to this Advisory Business and Possible Conflicts of Interest

Related Investment Advisers

IWM Advisors, LLC

IWM Advisors, LLC, is a New York based registered investment adviser. Peter Culver, an Associated Person of FFO is the sole owner of IWM Advisors, LLC. Mr. Culver devotes about 20% of his time to his activities at IWM Advisors, LLC. FFO and IWM Advisors, LLC are not expected to have joint client relationships.

This may represent a conflict of interest because it gives a potential incentive to refer Clients to a specific Investment Advisor. This conflict is mitigated by disclosures, procedures and FFO's fiduciary obligation to place the best interest of the Client first. Moreover, Clients are not required to engage either Investment Advisor or its representatives if they do not wish to. More information on this can be found in the respective Investment Advisor Representative's Form U4 and ADV 2B.

Insurance Services

Certain Executive officers and other Associated Persons of FFO are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to clients of FFO. Insurance commissions earned by these persons are separate and in addition to FFO's advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. **Clients of our firm are under no obligation, contractually or otherwise, to purchase insurance products through any person or entity affiliated with our firm.**

Selection of Other Advisors or Managers

FFO does not utilize nor select other advisors.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11

Code of Ethics

FFO has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes FFO's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code;
- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of FFO's Code of Ethics is available upon request to our firm at (855) 540-0400 or by email at ron@freedomfamilyoffice.com.

Recommendations Involving Material Financial Interests

FFO anticipates, in appropriate circumstances and consistent with Clients investment objectives, FFO may recommend the purchase of securities in which our affiliates, directly or indirectly, have a material financial interest. FFO's employees, directors, and partners often invest in these same securities. It is important to note that investment by employees, partners, and directors do not influence pricing. Nevertheless, these relationships pose a conflict of interest.

This conflict is mitigated by disclosures, procedures and FFO's fiduciary obligation to place the best interest of the Client first. In addition, FFO's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its supervised persons. These reviews ensure that the personal trading of interested persons does not disadvantage Clients of FFO. Moreover, FFO has adopted additional procedures such as limited personal trading to certain windows in order to remove appearances of frontrunning or other unethical trading methods. Lastly, Clients are under no obligation to invest in such partnerships.

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

FFO and its supervised persons may invest in the same securities (or related securities, e.g., warrants, options or futures) that FFO or a supervised person recommends to Clients. In order to mitigate conflicts of interest, such as frontrunning, FFO's Chief Compliance Officer, or their designee, will no less than quarterly, review firm and/or personal holdings of its supervised persons. These reviews are help ensure that the personal trading of supervised persons does not disadvantage Clients of FFO.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

FFO and its supervised persons may recommend securities, or buy or sell securities for Clients accounts, at or about the same time, that they also buy or sell the same securities in their own account(s). In order to mitigate conflicts of interest, such as frontrunning, FFO's Chief Compliance Officer, or their designee, will no less than

quarterly, review firm and/or personal holdings of its supervised persons. These reviews ensure that the personal trading of supervised persons does not disadvantage Clients of FFO.

Brokerage Practices - Item 12

FFO recommends that you establish brokerage accounts with LPL Financial LLC (“LPL”) or Charles Schwab & Co., Inc. (“Schwab”), which are registered broker-dealers and members of SIPC, to maintain custody of assets and to effect trades. Factors which FFO considers in recommending LPL or Schwab to Clients include their respective financial strength, reputation, execution, pricing, research and service. LPL and Schwab enable FFO to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by LPL or Schwab may be higher or lower than those charged by other Financial Institutions.

Broker-dealers charge account holders transaction related fees for securities trades. They provide FFO assistance in managing and administering Clients’ accounts. These include access to Client account data, facilitate trade execution, provide research, and facilitate payment of FFO management fees from its Clients’ accounts, recordkeeping, and Client reporting.

In choosing a broker-dealer or negotiating commission rates, we are not obligated to seek competitive bids or the lowest commission cost to you; but we determine that the commission rate charged is reasonable based on the quality of custodial services available to our Clients. As a fiduciary, FFO endeavors to act in your best interest.

The commissions paid by FFO’s Clients comply with FFO’s duty to obtain “best execution.” Clients may pay commissions that are higher than another qualified Financial Institution might charge to effect the same transaction where FFO determines that the commissions are reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a Financial Institution’s services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. FFO seeks competitive rates but may not necessarily obtain the lowest possible commission rates for Client transactions.

Research and Soft Dollar Benefits

FFO receives soft dollar benefits from the broker-dealer such as research (or other products or services). Since FFO generally does not have to pay for these products or services, FFO has an incentive to recommend a broker-dealer based on FFO’s interest in receiving the research or other products or services, rather than the Client’s interest in receiving the most favorable execution. FFO uses these benefits to service all Client accounts.

Custodians provide FFO with access to its institutional trading and custody services, which are typically not available to retail investors. Services include brokerage, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or require a significantly higher minimum initial investment.

Custodians also provide FFO other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

This conflict is mitigated by disclosures, procedures and FFO’s fiduciary obligation to place the best interest of our Client first.

Brokerage for Client Referrals

FFO does not receive Client referrals from the custodian in exchange for using the broker-dealer.

Directed Brokerage

FFO does not generally accept directed brokerage arrangements (when a Client requires that account transactions be effected through a specific broker-dealer). However, FFO does allow for Client directed brokerage in certain situations. Such situations may affect FFO's ability to negotiate commissions with the resulting inability to obtain volume discounts or best execution for Client directed accounts in some transactions. Therefore, a Client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case should the Client elect to trade through the broker-dealer FFO recommends.

Aggregation Trading for Multiple Client Accounts

While individual Client advice is provided to each account, Client trades can be executed as a block trade. The executing broker will be informed that the trades are for the account of FFO's Clients and not for FFO itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The aggregation should, on average, reduce slightly the costs of execution. We will not aggregate a Client's order if in a particular instance we believe that aggregation would cause the Client's cost of execution to be increased. The broker dealer will be notified of the amount of each trade for each account. FFO and/or its Associated Persons may participate in block trades with Clients, and may also participate on a pro rata basis for partial fills, but only after the determination has been made that Clients will receive fair and equitable treatment.

Review of Accounts - Item 13

Frequency and Nature of Periodic Review and Who Makes Those Reviews

FFO monitors client account holdings on a continuous basis and conducts formal account reviews at least annually. Accounts are reviewed by the Associated Person assigned to the account. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and suitability criteria, reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing, and reviewing accounts for tax loss harvesting opportunities. Reviews may be conducted in person, over the phone, or via internet-based video conference call services, such as ZOOM.

Financial plans are updated as requested by the Client and pursuant to a new or amended agreement, FFO suggests updating at least annually.

Factors That Will Trigger a Non-Periodic Review of Client Accounts

Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or upon client request.

Content and Frequency of Regular Reports

Clients will receive statements directly from their account custodian(s) at least quarterly. FFO may also provide performance reports on an as needed basis. Clients are strongly encouraged to compare the reports provided by FFO with the custodial statements.

Client Referrals and Other Compensation - Item 14

FFO may enter into agreements with individuals and organizations, which may be affiliated or unaffiliated with FFO, that refer Clients to FFO in exchange for compensation. All such agreements will be in writing and comply with the requirements of Federal or State regulation. If a Client is introduced to FFO by a solicitor, FFO may pay that solicitor a fee. While the specific terms of each agreement may differ, generally, the compensation will be a

flat fee per referral, or a percentage of the introduced capital. Any such fee shall be paid solely from FFO's investment management fee and shall not result in any additional charge to the Client.

Each prospective Client who is referred to FFO under such an arrangement will receive a separate written disclosure document disclosing the nature of the relationship between the solicitor and FFO.

Custody - Item 15

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at least quarterly. Clients are urged to compare the account statements received directly from their custodians to any documentation or reports prepared by FFO.

FFO is deemed to have limited custody because advisory fees are directly deducted from Client's accounts by the custodian on behalf of FFO. FFO will obtain written authorization from Client to allow for such deductions.

FFO also has limited custody due to having standing letters of authorization ("SLOA") to direct third party payments. FFO will meet the following seven conditions when a SLOA has been established with a Client to be exempted from the annual audit requirement:

1. The Client provides instructions to the qualified custodian, in writing, that includes the Client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer will be directed.
2. The Client authorizes the investment advisor, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The Client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the Client's authorization, and provides a transfer of funds notice to the Client promptly after each transfer.
4. The Client has the ability to terminate or change the instruction to the Client's qualified custodian.
5. The investment advisor has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the Client's instruction.
6. The investment advisor maintains records showing that the third party is not a related party of the investment advisor or located at the same address as the investment advisor.
7. The Client's qualified custodian sends the Client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

FFO is not affiliated with the custodian. The custodian does not supervise FFO, its employees or activities.

Investment Discretion - Item 16

FFO offers Portfolio Management Services on a discretionary basis. Client will authorize FFO discretionary authority, via the Advisory Agreement, to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold.

FFO allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to FFO in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. FFO does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Voting Client Securities - Item 17

Clients will receive proxy voting information directly from the issuer and/or custodian of the security. Clients will not receive any such proxy voting material from FFO. When assistance on voting proxies is requested by the Client, FFO will provide recommendations to the Client. However, FFO will not have authority to vote proxies on behalf of the Client. If in the future FFO obtains authority to vote proxies, this Brochure will be appropriately amended. Clients may contact FFO at (855) 540-0400 or by emailing ron@freedomfamilyoffice.com.

Financial Information - Item 18

Balance Sheet

FFO does not require nor solicit prepayment of more than \$1,200 in fees per Client, six months or more in advance.

Financial Condition

FFO nor its management persons have any financial conditions that are likely to reasonably impair its ability to meet contractual commitments to Clients.

Bankruptcy Petitions in Previous Years

FFO has not been the subject of a bankruptcy petition in the last ten years.