

Freedom Capital Management Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Freedom Capital Management. If you have any questions about the contents of this brochure, please contact us at (617) 413-5781 or by email at: eschweitzer@freedomcapmanagement.com. 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 Freedom Capital Management is also available on the SEC's website at www.adviserinfo.sec.gov. Freedom Capital Management's CRD number is: 313926.

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Registration as an investment adviser does not imply a certain level of skill or training.

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Item 2: Material Changes

The material changes in this brochure from the last annual updating amendment of Freedom Capital Management on 01/31/2024 are described below. Material changes relate to Freedom Capital Management's policies, practices or conflicts of interests.

- Estate Plan Navigator changed their name to Estate Guru, LLC. (Item 4)
- Freedom Capital Management removed reference to College Aid Pro. (Item 4)
- Freedom Capital Management updated its fee schedule, and all asset-based fees are charged in advance. (Item 5)
- GeoWealth has acquired First Ascent Asset Management, LLC. (Item 5)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Freedom Capital Management of Virginia LLC d/b/a Freedom Capital Management (hereinafter "FCM") is a Limited Liability Company organized in the State of Virginia. The firm was formed in March 2021 and became registered with the Commonwealth of Virginia to perform investment advisory services in June 2021. The principal owner is Edward Newton Schweitzer.

B. Types of Advisory Services

Third-Party Investment Manager Services

FCM will direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, FCM will always ensure those other advisers are properly licensed or registered as an investment adviser. FCM conducts due diligence on any third-party investment adviser, which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. FCM then makes investments with a third-party investment adviser by referring the client to the third-party adviser. FCM will have an ongoing relationship with the client to help review the suitability, evaluate the services of the third-party investment adviser, and update as needed. FCM will review the ongoing performance of the third-party adviser as a portion of the client's portfolio. The third-party adviser will conduct ongoing research regarding the investments, select investments, and manage the client's portfolio. The third-party adviser will monitor the account on an ongoing basis, consistent with the client's investment objectives and risk tolerance.

Education and Estate Planning

Additionally, FCM also offers clients the opportunity to construct individualized estate plans with the assistance of Estate Guru, LLC for an additional fee. FCM, with the help of Estate Guru, LLC's assembled team of specialists, may provide the following services upon the client's request:

- Creating, executing, and funding an estate plan specific to the client's needs;
- Assisting with tracking and communicating with the individuals named in the estate plan;
- Ongoing maintenance of the estate plan and helping clients know how and when to amend the estate plan as their life circumstances change;
- Ensuring the client's wishes are carried out effectively when the time comes;
- Preparing documents including, but not limited to: Last Will & Testament; Healthcare Directives; Power of Attorney; & Living Trust.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Services Limited to Specific Types of Investments

FCM generally limits its investment advice to mutual funds, real estate funds and ETFs. FCM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

FCM will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by FCM on behalf of the client. FCM may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

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

E. Assets Under Management

FCM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 0.00	\$ 9,780,719.00	December 2024

Item 5: Fees and Compensation

Third-Party Investment Manager Fees

The advisory fee is paid to the third-party investment manager on a quarterly basis, in advance, and will be determined by multiplying the previous quarter-ending account value by the applicable annualized basis points set forth in the below fee table (one basis point equals 1/100 of one percent). The result is then divided by four to determine the quarterly fee. The first quarter's fee will be prorated if the client entered into the engagement mid-quarter. Formula: ((previous quarter market value) x (applicable annualized number of basis points)) ÷ 4.

Assets Under Management	FCM's fee	GeoWealth' Fee	Total Annualized Asset-Based Fee
\$0 - \$400,000	1.00% less 0.35%	.35%	1.00% (100 basis points)
\$400,001 - \$500,000	1.00% less \$1,400	\$1,400	1.00% (100 basis points)
\$500,001 - \$1,000,000	0.75% less \$1,400	\$1,400	0.75% (75 basis points)
\$1,000,001 - \$2,000,000	0.50 % less \$1,400	\$1,400	0.50 % (50 basis points)
\$2,000,001 - \$3,000,000	0.35% less \$1,400	\$1,400	0.35% (35 basis points)
\$3,000,001 - \$6,000,000	0.35% less \$1400 + \$500 per million over \$3,000,000	\$1400 + \$500 per million over \$3,000,000	0.35% (35 basis points)
\$6,000,001 - \$10,000,000	0.30% less \$1400 + \$500 per million over \$3,000,000	\$1400 + \$500 per million over \$3,000,000	0.30% (30 basis points)
\$10,000,001 - Above	0.05% less \$1400 + \$500 per million over \$3,000,000	\$1400 + \$500 per million over \$3,000,000	0.05% (5 basis points)

This fee schedule is blended. For example, for a \$750,000 account, the first \$500,000 would be billed at 1.00% (100 basis points), and the balance would be billed at a rate of 0.75% (75 basis points). GeoWealth's fee (the third-party investment manager, CRD# 148222) charges .35% (35 basis points) up to \$400,000 in AUM. For amounts above \$400,000, GeoWealth charges a maximum household flat fee of \$1,400. For amounts above \$3,000,000, GeoWealth's fee is \$1400 + \$500 per million over \$3,000,000. GeoWealth's fee is non-negotiable.

The fee schedule above includes GeoWealth's advisory fee. Account fees, including debits and credits, will be noted on account statements that the client receives directly from the custodian of record on at least a quarterly basis. GeoWealth will calculate all fees for the account; we are not involved in the billing process of third-party investment accounts. GeoWealth will deduct the fee from the client's account and pay FCM their portion of the advisory fee. In the event of Client closing their Account, GeoWealth shall calculate a pro-rated fee refund and either credit the Account or send the Client a fee refund check. We recommend that clients verify the accuracy of fee calculations; the custodian may not verify the accuracy of the third-party manager's fee calculation.

For all clients directed to third-party investment advisers, FCM will provide the client a disclosure pursuant to 21 Virginia Administrative Code 5-80-190(E) that will include:

1. The name of the assisting investment advisor representative;
2. The name of the other investment advisor;
3. The nature of the relationship, including any affiliation between the assisting investment advisor representative and the other investment advisor;
4. A statement that the assisting investment advisor representative will be compensated for his services by the other investment advisor;
5. The terms of such compensation arrangement, including a description of the compensation paid to the assisting investment advisor representative;
6. Compensation differentials charged to clients above the normal other investment advisor's fee, as a result of the cost of obtaining clients by compensating the assisting investment advisor representative.

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

FCM collects fees in advance. For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee by 365.)

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

Education and Estate Planning Fees

The fixed fee for this service is \$500. Fees are invoiced and payable via cash, check, or wire. Fees are paid in advance.

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

FCM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client. FCM does not engage in side-by-side management.

Item 7: Types of Clients

FCM generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Charitable Organizations

There is no account minimum for any of FCM's services. There are no requirements for opening or maintaining an account.

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

Methods of Analysis & Investment Strategies

FCM does not manage assets directly, but will provide clients and all prospects whom FCM recommends third-party investment manager information regarding methods of analysis and investment strategies. This information will be explained in the Part 2A brochure of the third-party investment manager that FCM will offer to all clients needing portfolio management services.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Selection of Other Advisers: Although FCM will seek to select only money managers who will invest clients' assets with the highest level of integrity, FCM's selection process cannot ensure that money managers will perform as desired and FCM will have no control over the day-to-day operations of any of its selected money managers. FCM would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither FCM nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

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

Neither FCM nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Edward Newton Schweitzer is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. FCM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to act on the advice or to utilize the services of Edward Newton Schweitzer when he is acting in his capacity as an independent insurance agent. Less than five hours a month are spent on this other business activity.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

FCM will direct clients to third-party investment advisers to manage all or a portion of the client's assets. FCM will be compensated via a fee share from the advisers to which it directs those clients. This relationship will be memorialized in each contract between FCM and each third-party advisor. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that FCM has an incentive to direct clients to the third-party investment advisers that provide FCM with a larger fee split. FCM will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. FCM will ensure that all recommended advisers are licensed or notice filed in the states in which FCM is recommending them to clients.

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

A. Code of Ethics

FCM has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. FCM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

FCM does not recommend that clients buy or sell any security in which a related person to FCM or FCM has a material financial interest. Should a material financial interest arise, FCM will notify the clients promptly and amend the brochure to disclose any conflicts involving a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of FCM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of FCM to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. FCM will always document any transactions that could be construed as conflicts of interest and will never engage in

trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of FCM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of FCM to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, FCM will never engage in trading that operates to the client's disadvantage if representatives of FCM buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

FCM does not trade client's accounts or recommend broker/custodians. FCM does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits"). FCM does not have the ability to block trade purchases across accounts. FCM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Item 13: Review of Accounts

Client accounts managed by the third-party investment manager are monitored and reviewed at least annually with the client by Edward Newton Schweitzer, Managing Member and Chief Compliance Office, with regard to client's investment policies and risk tolerance levels.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client of FCM's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

FCM may also receive compensation from the selected third-party investment managers via a fee split. Please see Item 5 and Item 10D of this brochure for the firm's compensation arrangements and relationship with third-party investment managers.

B. Compensation to Non - Advisory Personnel for Client Referrals

FCM does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

FCM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Item 16: Investment Discretion

FCM does not have discretion over client accounts at any time.

Item 17: Voting Client Securities (Proxy Voting)

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

Item 18: Financial Information

A. Balance Sheet

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

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither FCM nor its management has any financial condition that is likely to reasonably impair FCM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

FCM currently has only one management person: Edward Newton Schweitzer. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

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

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

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

D. Material Disciplinary Disclosures for Management Persons of this Firm

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

E. Material Relationships That Management Persons Have with Issuers of Securities (If Any)

See Item 10.C and 11.B.