

ITEM 1 – COVER PAGE

FREEWILL PLANNING, LLC

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Seattle, WA 98105

FIRM BROCHURE

This brochure provides information about the qualifications and business practices of FreeWill Planning, LLC, a Delaware limited liability company. If you have any questions about the contents of this Brochure, please contact us at (516) 951-1715 or chuck@freewill.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 FreeWill Planning, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Registration as an investment advisor does not imply a certain level of skill or training.

October 28, 2024

ITEM 2 – MATERIAL CHANGES

This is FreeWill Planning, LLC's initial brochure.

ITEM 3 – TABLE OF CONTENTS

ITEM 1 – COVER PAGE.....	1
ITEM 2 – MATERIAL CHANGES	2
ITEM 3 – TABLE OF CONTENTS.....	3
ITEM 4 – ADVISORY BUSINESS	5
A. DESCRIPTION OF FIRM.....	5
B. TYPES OF ADVISORY SERVICES.....	5
C. NO TAILORED ADVICE.....	6
D. NO WRAP-FEE PROGRAMS.....	6
E. NO CLIENT ASSETS	6
ITEM 5 – FEES AND COMPENSATION	6
A. HOW WE ARE COMPENSATED	6
B. BILLING PRACTICES	6
C. OTHER FEES AND EXPENSES	6
D. ADVANCED FEES.....	6
E. COMPENSATION FOR SALE OF SECURITIES.....	7
F. CONFLICT OF INTEREST DISCLOSURE	7
ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT.....	7
ITEM 7 – TYPES OF CLIENTS	7
ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES, RISK OF LOSS.....	7
A. METHODS OF ANALYSIS	7
B. MATERIAL RISKS	7
C. RISKS ASSOCIATED WITH A PARTICULAR RECOMMENDATION	9
ITEM 9 – DISCIPLINARY INFORMATION	10
ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS.....	10
A. NO BROKER DEALER REGISTRATIONS	10
B. NO FUTURES/COMMODITIES REGISTRATIONS	10
C. MATERIAL RELATIONSHIPS TO ADVISORY BUSINESS OR CLIENTS	10
D. CONFLICT OF INTEREST DISCLOSURE	10
ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING.....	11
A. CODE OF ETHICS	11
B. MATERIAL FINANCIAL INTEREST IN RECOMMENDED SECURITIES	11

C. INVESTING IN SAME SECURITIES AS CLIENTS.....	11
D. RECOMMENDING AND BUYING SECURITIES FOR CLIENT ACCOUNT AND OWN ACCOUNT.....	11
ITEM 12 – BROKERAGE PRACTICES.....	11
A. FACTORS CONSIDERED	11
B. CONDITIONS UNDER WHICH WE AGGREGATE SECURITIES	11
ITEM 13 – REVIEW OF ACCOUNTS.....	11
A. NO ACCOUNT REVIEWS.....	11
B. FACTORS THAT TRIGGER REVIEW	11
C. NO CLIENT REPORTS	11
ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION RECEIVED.....	12
A. CONFLICT OF INTEREST DISCLOSURE	12
B. COMPENSATION PAID FOR INTRODUCTIONS.....	12
ITEM 15 – CUSTODY	12
ITEM 16 – INVESTMENT DISCRETION	12
ITEM 17 – VOTING CLIENT SECURITIES.....	12
ITEM 18 – FINANCIAL INFORMATION	13
A. NO APPLICABLE PREPAYMENTS/NO BALANCE SHEET PROVIDED	13
B. FINANCIAL CONDITION.....	13
C. NO BANKRUPTCY PETITIONS	13

ITEM 4 – ADVISORY BUSINESS

A. DESCRIPTION OF FIRM

FreeWill Planning, LLC (“we,” “us,” or “our”) is an investment advisor that was founded in 2024 and registered with the U.S. Securities and Exchange Commission (“SEC”). We are owned entirely by FreeWill Co., which is the sole member of FreeWill Planning, LLC.

FreeWill Co. is a social impact technology company that provides software tools to enable individuals to prepare their own wills, revocable living trusts, advanced health care directives, and powers of attorney (“**do-it-yourself services**”). FreeWill Co. also sells charitable giving platform software as a service (“**SaaS**”) products to nonprofit organizations and facilitates the liquidation of gifts of securities and cryptocurrency to nonprofits.

FreeWill Co. receives many requests for introductions to financial advisors from individual users of its do-it-yourself services and SaaS products. FreeWill Planning, LLC was established in 2024 to contact those individuals and, when appropriate, provide them with introductions to a third party registered investment advisor, and potentially other third party investment advisors in the future (collectively, “**Financial Advisors**”).

FreeWill Planning, LLC contacts individuals who have expressed an interest to FreeWill Co. in speaking with a financial advisor (“**Client**”). Upon verifying the Client’s appropriateness for being introduced to a Financial Advisor as explained in Item 7 and obtaining their consent to make an introduction, we introduce them to a Financial Advisor. Beyond providing basic financial education materials and the introduction to a Financial Advisor, we do not participate in advising such Client.

After we make an introduction, the Client determines whether to enter into an advisory relationship with the Financial Advisor. If the Client chooses to engage the Financial Advisor, they will be referred to as a “**Financial Advisor Customer**” or “**Customer**.” Any advisory relationship that results from our introduction is solely a private contractual relationship between the Client and Financial Advisor.

Other than confirming that the Financial Advisor is duly registered as an investment advisor and reviewing the public information disclosed in their Form ADV, we do not review the investing results, performance, or quality of advice of the Financial Advisor. Before becoming a Financial Advisor Customer, each Client who we introduce to a Financial Advisor should conduct their own assessment of the Financial Advisor to confirm that the Financial Advisor’s services are suitable to the Client’s needs. Financial Advisor Customers should also monitor the Financial Advisor’s performance throughout their relationship and assess if another advisor would be better suited to their needs.

B. TYPES OF ADVISORY SERVICES

Our advisory services are limited to providing basic financial education materials and introducing Clients to a Financial Advisor. We do not manage assets, provide investment recommendations, engage in financial planning, or execute trades for any individual. We are also not tax or legal professionals and do not give tax or legal advice.

C. NO TAILORED ADVICE

Since we do not otherwise render investment advice and limit our advice to providing basic financial education materials and introducing Clients to a Financial Advisor, we do not tailor any advisory services to the particular needs of individuals. To the extent a Client who we introduce to a Financial Advisor becomes a Customer of the Financial Advisor and desires to impose restrictions on investing in certain securities or types of securities, such restrictions should be requested of the Financial Advisor.

D. NO WRAP-FEE PROGRAMS

We do not use wrap fee programs.

E. NO CLIENT ASSETS

We do not manage assets and have no regulatory assets under management.

ITEM 5 – FEES AND COMPENSATION

A. HOW WE ARE COMPENSATED

Clients who we introduce to a Financial Advisor do not incur any fees charged by us. We receive fees from the Financial Advisor if a Client becomes a Customer of the Financial Advisor, and we also receive other compensation from the Financial Advisor, such as a reimbursement for certain technology expenses we incurred.

When a Client becomes a Financial Advisor Customer, we receive a fee equal to ten percent (10%) of the investment management fee collected by the Financial Advisor from the Customer. Our fee arrangement may change in the future and may be negotiated with each Financial Advisor.

B. BILLING PRACTICES

We only charge fees to the Financial Advisor to which we introduce each Client. We do not bill Clients directly.

C. OTHER FEES AND EXPENSES

Financial Advisors may charge their Customers various fees and expenses, including advisory fees and management fees based on assets under management. Financial Advisor Customers may also incur fees from third parties, including brokerage and other transaction costs, custodian fees, mutual fund or exchange traded fund fees, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, check-writing fees, early-redemption charges, margin fees and interest, IRA and qualified retirement plan fees, and other fees and taxes on brokerage accounts and securities transactions. Clients should ask the Financial Advisor about all fees and expenses charged by the Financial Advisor and its service providers.

D. ADVANCED FEES

Not applicable.

E. COMPENSATION FOR SALE OF SECURITIES

Not applicable.

F. CONFLICT OF INTEREST DISCLOSURE

We are compensated when a Client who we introduce to a Financial Advisor becomes a Customer of the Financial Advisor. This creates a material conflict of interest by incentivizing us to recommend the Financial Advisor and introduce Clients to the Financial Advisor. Prior to making an introduction, we advise each Client in writing about this conflict of interest and encourage them to independently screen and vet the Financial Advisor to ensure that the Financial Advisor's services are suitable. Clients who we introduce to a Financial Advisor always have the option to hire a different financial advisor or seek an introduction from another party that introduces potential clients to financial advisors. Payments from Financial Advisors are our exclusive source of earned revenue.

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

We do not accept performance-based fees.

ITEM 7 – TYPES OF CLIENTS

We introduce Clients to Financial Advisors. FreeWill Co. receives many requests for introductions to a financial advisor from the individual users of its do-it-yourself services and SaaS products. FreeWill Planning, LLC was established to contact those individuals, provide them with basic financial education materials, screen them as described in the following paragraph, and if appropriate introduce them to a Financial Advisor.

We only introduce Clients to a Financial Advisor if those Clients meet the selection criteria of the Financial Advisor. We thus call each Client to verify that their net worth is a minimum of \$500,000 or their investable assets are a minimum of \$250,000 before making an introduction to the Financial Advisor. Other Financial Advisors may have different criteria in the future.

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

A. METHODS OF ANALYSIS

Other than confirming that the Financial Advisor is duly registered as an investment advisor and reviewing the public information disclosed in their Form ADV, we do not review the investing results, performance, or quality of advice of the Financial Advisor. Our advisory work is limited to introducing Clients to Financial Advisors. As such, we do not use or recommend any particular methods of analysis or investment strategies. If a Client who we introduce to a Financial Advisor becomes a Customer of the Financial Advisor, then the methods of analysis and investment strategies used for that Customer will be determined and implemented solely by the Financial Advisor without our oversight, knowledge, or control.

B. MATERIAL RISKS

All investing involves risk of loss. There is no guarantee that portfolios managed by a Financial Advisor will perform as expected, nor is there a guarantee that a Financial Advisor's advice will result in a positive outcome for any Customer. Investors may lose money. Past performance of

any Financial Advisor does not guarantee future returns. In addition, investors should be aware of the following risks:

Market Risk: The value of a security may decline due to both tangible and intangible events and conditions. External factors can trigger this type of risk regardless of the specific circumstances related to a security. For instance, political, economic, and social conditions can influence market conditions. Additionally, risks specific to a security can negatively affect its price. For example, an ETF with a significant concentration in a particular security, sector, or country may experience adverse events impacting its price.

Tax Risk in ETFs, Mutual Funds, and Other Investment Products: In certain situations, an ETF, mutual fund, or other investment product may distribute capital gains to shareholders. These capital-gain distributions are not always favorable, as shareholders are responsible for paying the capital gains tax.

Inflation Risk: When inflation occurs, a dollar today will not have the same purchasing power as a dollar in the future, as the value of the dollar erodes at the rate of inflation.

Volatility Risk: Volatility refers to the degree of uncertainty or risk regarding the magnitude of changes in the value of a security. High volatility indicates that the price of a security may vary widely and change dramatically over a short period. Significant price drops may occur. Many securities have experienced high volatility and substantial price declines in recent years.

Currency Risk: A security not denominated in U.S. dollars is subject to fluctuations in the value of the U.S. dollar against the currency in which the security is denominated. For example, the dollar value of a security denominated in euros will decrease if the dollar strengthens against the euro. This type of risk is also known as exchange-rate risk.

Reinvestment Risk: Future proceeds from investments may need to be reinvested in government or corporate bonds at a lower rate of return due to potentially lower future yields.

Business Risk: This risk is associated with a specific industry or issuer. For example, an oil production company relies on a lengthy process of finding, transporting, and selling oil before generating a profit. Consequently, an oil production company has a higher risk of profitability variance compared to an electric utility company, which generates income from a relatively stable customer base that must purchase electricity regardless of economic conditions.

Liquidity Risk: Liquidity refers to the ease of converting an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For instance, U.S. Treasury bills are highly liquid, whereas real estate is not. Investors should consider their liquidity needs when evaluating the suitability of an investment.

Structural Risk: ETFs, ETNs, mutual funds, and other investment products may use leverage and invest in financial derivatives. Advisors may also engage in short-selling or have exposures similar to short-selling. These investment products face risks such as the inability to post collateral or maintain sufficient capital relative to the size of their positions, which may force

them to unwind positions quickly in unfavorable market conditions, potentially resulting in significant losses for investors.

Financial Risk: Excessive borrowing to finance business operations increases profitability risks because the company must repay principal and interest during both good and bad economic times. During financial stress periods, a company's inability to meet loan obligations may decrease its securities' value and potentially force it into bankruptcy.

Risks Related to Public-Health Crises: Future public-health crises, such as the COVID-19 pandemic, may have unpredictable and adverse impacts on global, national, and local economies, negatively affecting investors and their investment performance. Disruptions to commercial activity (e.g., quarantines and travel restrictions) or failure to manage a public-health crisis effectively may increase financial stress on issuers of securities, adversely impacting investment performance. The ability of Financial Advisor personnel to identify, purchase, monitor, and dispose of investments may also be negatively affected due to direct or indirect business operation disruptions. Public health events may contribute to extreme financial market volatility, adversely affecting a Financial Advisor's ability to dispose of investments and significantly increasing overall risk, potentially having a material adverse impact on investment performance. Such events are difficult to predict and present substantial uncertainty and risk regarding investor's performance.

Custodian Risk: There is a risk that a custodian of investor funds may not provide promised services to each investor. Additionally, custodians may face financial challenges that could negatively impact clients.

C. RISKS ASSOCIATED WITH A PARTICULAR RECOMMENDATION

While we may suggest other Financial Advisors in the future, we currently introduce Clients to a single Financial Advisor. We believe that this Financial Advisor is a reputable provider of investment advice and financial planning services, but it is important for Clients to understand the specific risks associated with this arrangement:

Limited Choice of Service Providers: By introducing Clients exclusively to a single Financial Advisor, we do not provide a range of options regarding investment advisory and financial planning service providers. This means Clients may not consider potentially better-suited or more cost-effective services offered by other financial advisors.

Potential Conflicts of Interest: We receive compensation for introducing Clients to Financial Advisors, when such Clients become Customers of the Financial Advisors. Our compensation is a percentage of the fee charged to each Customer by the Financial Advisor. As set forth in Item 5, this compensation arrangement creates a conflict of interest because it incentivizes us to introduce Clients to those Financial Advisors that compensate us.

Lack of Ongoing Oversight: Once a Client becomes a Customer of a Financial Advisor, we do not provide ongoing oversight or monitoring of the services. Any issues or concerns regarding the quality or suitability of the Financial Advisor's advice and services will need to be addressed directly with that Financial Advisor.

Reliance on Financial Advisor's Capabilities: The quality and effectiveness of the investment advice and financial planning that Customers receive will depend entirely on the Financial Advisor's capabilities and performance. We do not have control over or responsibility for the advice and services provided by any Financial Advisor.

Potential for Higher Costs: Other financial advisors may charge lower fees and expenses than the Financial Advisors to which we introduce Clients. Clients should review and understand all fees and expenses associated with becoming a Customer of a Financial Advisor, while also bearing in mind that other financial advisors may charge lower fees.

ITEM 9 – DISCIPLINARY INFORMATION

Not applicable.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. NO BROKER DEALER REGISTRATIONS

Not applicable.

B. NO FUTURES/COMMODITIES REGISTRATIONS

Not applicable.

C. MATERIAL RELATIONSHIPS TO ADVISORY BUSINESS OR CLIENTS

We are wholly-owned by FreeWill Co., which provides us with the names and contact information of individuals who express interest in financial planning services. We then screen those individuals as described in Item 7. If we determine that an individual meets the Financial Advisor's criteria and the individual gives us consent to make an introduction, we then introduce them to a Financial Advisor. Financial Advisors compensate us when a Client who we introduce becomes a Customer of the Financial Advisor.

Each of our corporate officers are employees of FreeWill Co. Jennifer Spradling, our Chief Executive Officer, is the Co-CEO of Freewill Co. Andrew Nick, our Chief Legal Officer, and Charles Borek, our Chief Compliance Officer, are the General Counsel and Associate General Counsel of FreeWill Co., respectively. Andrew Nick and Charles Borek are attorneys and Charles Borek is also a Certified Public Accountant.

D. CONFLICT OF INTEREST DISCLOSURE

FreeWill Planning, LLC introduces Clients to Financial Advisors. We receive compensation directly from those Financial Advisors when a Client who we introduced becomes a Customer of the Financial Advisor. This compensation arrangement creates a material conflict of interest by incentivizing us to recommend Financial Advisors to Clients and introducing Clients to Financial Advisors.

Before introducing a Client to a Financial Advisor, we inform the Client of this conflict of interest and explain that we receive compensation if the Client becomes a Customer of the Financial Advisor. We also indicate that there are many other financial advisors that the Client can seek out on their own. Each Client who we introduce to a Financial Advisor always has the

option to hire a different financial advisor or seek an introduction from another party that introduces potential clients to financial advisors.

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

A. CODE OF ETHICS

FreeWill Planning, LLC follows a Code of Ethics expressing the organization's commitment to honest, ethical, and lawful conduct, its duties and responsibilities to the Clients it introduces to Financial Advisors, and its practice of monitoring employees' personal securities transactions and prohibiting the use of material non-public information. The Code of Ethics also includes sections related to compliance with securities laws, reporting of violations of the Code of Ethics to the Chief Compliance Officer, pre-approval of certain investments by access persons, and the distribution of the Code of Ethics to all supervised persons.

We provide a complete copy of the Code of Ethics to any Client upon request. Requests should be submitted to Charles A. Borek, Chief Compliance Officer, 2041 East Street, PMB 615, Concord, California 94250 or email at chuck@freewill.com.

B. MATERIAL FINANCIAL INTEREST IN RECOMMENDED SECURITIES

Not applicable.

C. INVESTING IN SAME SECURITIES AS CLIENTS

Not applicable.

D. RECOMMENDING AND BUYING SECURITIES FOR CLIENT ACCOUNT AND OWN ACCOUNT

Not applicable.

ITEM 12 – BROKERAGE PRACTICES

A. FACTORS CONSIDERED

Not applicable.

B. CONDITIONS UNDER WHICH WE AGGREGATE SECURITIES

Not applicable.

ITEM 13 – REVIEW OF ACCOUNTS

A. NO ACCOUNT REVIEWS

We do not manage or review accounts or financial plans.

B. FACTORS THAT TRIGGER REVIEW

Not applicable.

C. NO CLIENT REPORTS

Not applicable.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION RECEIVED

A. CONFLICT OF INTEREST DISCLOSURE

We introduce Clients to Financial Advisors. Currently, we have an arrangement with a single Financial Advisor that is the sole Financial Advisor to which we make introductions. In exchange for such introductions, we are paid fees by the Financial Advisor if a Client we introduce becomes a Customer of the Financial Advisor. This creates a conflict of interest by incentivizing us to recommend the Financial Advisor and make introductions to Clients.

Prior to making an introduction, we advise each Client in writing about this conflict of interest and encourage them to independently screen and vet the Financial Advisor to ensure that the Financial Advisor's services are suitable for them. We also provide Clients with a disclosure statement that describes the relationship between us and the Financial Advisor, including the compensation that will be paid to us and the material conflict of interest that arises from this relationship.

Clients who we introduce to a Financial Advisor always have the option to hire a different financial advisor. Payments from the Financial Advisors to which we introduce Clients are our exclusive source of revenue.

B. COMPENSATION PAID FOR INTRODUCTIONS

FreeWill Planning, LLC is wholly-owned by FreeWill Co., which provides us with the names and contact information of individuals who express interest in financial planning services. We then screen those individuals as described in Item 7, obtain their consent, and when appropriate introduce them to Financial Advisors, who compensate us when a Client we introduce becomes a Customer of the Financial Advisor. We do not pay FreeWill Co. for providing us with the names and contact information of Clients. However, since FreeWill Co. owns FreeWill Planning, LLC, FreeWill Co. receives an economic benefit when we are compensated by Financial Advisors.

ITEM 15 – CUSTODY

Not applicable.

ITEM 16 – INVESTMENT DISCRETION

Not applicable.

ITEM 17 – VOTING CLIENT SECURITIES

FreeWill Planning, LLC does not accept or have authority to vote Client securities. Individual investors should receive their proxies or other solicitations from their financial advisor or broker-dealer, or directly from their custodian or transfer agent. Individuals should direct any inquiries regarding such proxies or voting materials directly to those parties.

ITEM 18 – FINANCIAL INFORMATION

A. NO APPLICABLE PREPAYMENTS/NO BALANCE SHEET PROVIDED

Not applicable.

B. FINANCIAL CONDITION

Not applicable.

C. NO BANKRUPTCY PETITIONS

Not applicable.