

**FORM ADV PART 2A  
DISCLOSURE BROCHURE**



**Freedom Fiduciaries LLC**

**Office Address:**

300 E Mallard Dr. Ste 100  
Boise, ID 83706

**Tel:** 208-900-4331

**Email:** [shane@freedomfiduciaries.com](mailto:shane@freedomfiduciaries.com)

**Website:** [Freedomfiduciaries.com](http://Freedomfiduciaries.com)

March 13, 2024

This brochure provides information about the qualifications and business practices of Freedom Fiduciaries LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 208-900-4331. 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 FIDUCIARIES LLC (CRD #323673) IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV)**

## **Item 2: Material Changes**

---

### **Annual Update**

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

---

### **Material Changes since the Last Update**

Since the last filing of this brochure on February 5, 2024, there have been the following changes:

- The brochure has been updated for SEC registration.
  - Items 4 and 5 to disclose a new service.
  - Items 2 and 4 of Ms. Hansen's Part 2B have been updated regarding Outside Business Activities.
- 

### **Full Brochure Available**

This Firm Brochure being delivered is the complete brochure for the Firm.

## Item 3: Table of Contents

### Form ADV – Part 2A – Firm Brochure

#### Item 1: Cover Page

#### Item 2: Material Changes ..... ii

Annual Update ..... ii

Material Changes since the Last Update..... ii

Full Brochure Available..... ii

#### Item 3: Table of Contents..... iii

#### Item 4: Advisory Business ..... 1

Firm Description ..... 1

Types of Advisory Services ..... 1

Client Tailored Services and Client Imposed Restrictions..... 6

Wrap Fee Programs..... 6

Client Assets under Management ..... 6

#### Item 5: Fees and Compensation ..... 6

Method of Compensation and Fee Schedule..... 6

Client Payment of Fees ..... 8

Additional Client Fees Charged..... 8

Prepayment of Client Fees ..... 8

External Compensation for the Sale of Securities to Clients..... 8

#### Item 6: Performance-Based Fees and Side-by-Side Management..... 8

Sharing of Capital Gains ..... 8

#### Item 7: Types of Clients ..... 8

Description ..... 8

Account Minimums ..... 9

#### Item 8: Methods of Analysis, Investment Strategies and Risk of Loss ..... 9

Methods of Analysis..... 9

Investment Strategy ..... 9

Security Specific Material Risks..... 9

#### Item 9: Disciplinary Information..... 11

Criminal or Civil Actions ..... 11

Administrative Enforcement Proceedings ..... 11

Self- Regulatory Organization Enforcement Proceedings .....	11
<b>Item 10: Other Financial Industry Activities and Affiliations .....</b>	<b>11</b>
Broker-Dealer or Representative Registration .....	11
Futures or Commodity Registration .....	11
Material Relationships Maintained by this Advisory Business and Conflicts of Interest .....	11
Recommendations or Selections of Other Investment Advisors and Conflicts of Interest .....	12
<b>Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....</b>	<b>12</b>
Code of Ethics Description .....	12
Investment Recommendations Involving a Material Financial Interest and Conflict of Interest .....	13
Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest .....	13
Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest .....	13
<b>Item 12: Brokerage Practices .....</b>	<b>13</b>
Factors Used to Select Broker-Dealers for Client Transactions .....	13
Aggregating Securities Transactions for Client Accounts .....	14
<b>Item 13: Review of Accounts .....</b>	<b>14</b>
Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved .....	14
Review of Client Accounts on Non-Periodic Basis .....	14
Content of Client Provided Reports and Frequency .....	14
<b>Item 14: Client Referrals and Other Compensation .....</b>	<b>14</b>
Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest .....	14
Advisory Firm Payments for Client Referrals .....	14
<b>Item 15: Custody .....</b>	<b>15</b>
Account Statements .....	15
<b>Item 16: Investment Discretion .....</b>	<b>15</b>
Discretionary Authority for Trading .....	15
<b>Item 17: Voting Client Securities .....</b>	<b>15</b>
Proxy Votes .....	15
<b>Item 18: Financial Information .....</b>	<b>15</b>
Balance Sheet .....	15

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients.....	16
Bankruptcy Petitions during the Past Ten Years.....	16
<b>Brochure Supplement (Part 2B of Form ADV) .....</b>	<b>18</b>
Principal Executive Officer – Shane Hanson.....	18
Item 2 - Educational Background and Business Experience .....	18
Item 3 - Disciplinary Information .....	18
Item 4 - Other Business Activities.....	19
Item 5 - Additional Compensation.....	19
Item 6 - Supervision .....	19
<b>Brochure Supplement (Part 2B of Form ADV) .....</b>	<b>21</b>
Supervised Person – Cristina Hansen .....	21
Item 2 - Educational Background and Business Experience .....	21
Item 3 - Disciplinary Information .....	21
Item 4 - Other Business Activities.....	22
Item 5 - Additional Compensation.....	22
Item 6 - Supervision .....	22

## Item 4: Advisory Business

---

### Firm Description

Freedom Fiduciaries LLC (“Freedom”) was founded in 2022 and became registered as an investment adviser in 2023. Shane Hanson is 95% owner and Chief Compliance Officer. Cristina Hansen is 5% owner.

---

### Types of Advisory Services

#### ASSET MANAGEMENT

Freedom offers discretionary direct asset management services to advisory Clients utilizing The Betterment for Advisors (“Betterment”) platform for digital services. On this platform, Freedom has the discretion to delegate the management of all or part of the Assets to one or more model investment portfolios developed by third-party Model Portfolio Providers. To the extent utilized, Model Portfolio Providers will have limited power-of-attorney and trading authority over those assets Freedom directs to them for management. Freedom will supervise the Model Portfolio Providers and monitor and review asset allocation and asset performance. Freedom may change Model Portfolio Providers when, in Freedom’s sole discretion, Freedom believes such changes are in your best interest.

#### NON-QUALIFIED DEFERRED COMPENSATION PLANS

Freedom may provide non-qualified deferred compensation plans with the following services:

**Limited Scope Fiduciary.** Freedom may serve as a limited scope fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor Freedom has a fiduciary duty to act in the best interest of the plan sponsor. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using Freedom can help the plan sponsor delegate liability by following a diligent process.

#### 1. Fiduciary Services are:

- Provide investment advice to the plan sponsor about asset classes and investment alternatives available for the Plan in accordance with the Plan’s investment policies and objectives. Plan sponsor will make the final decision regarding the initial selection, retention, removal and addition of investment options. Freedom acknowledges that it is a fiduciary.
- Assist the plan sponsor in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. Plan sponsor shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the non-qualified default investment alternative (QDIA) for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The plan sponsor retains the sole responsibility to select the investment vehicle for the QDIA and to provide all notices to the Plan participants as required.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance

to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.

- Meet with plan sponsor on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Plan sponsor understands Freedom's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Freedom is not providing fiduciary advice to the Plan participants. Freedom will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- One-time consulting services.

Freedom may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Freedom and plan sponsor.

3. Freedom has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Freedom under this Agreement.

**Full Scope Manager.** Freedom can also act as a Full Scope Manager in which it has discretionary management and control of a given retirement plan's assets. Freedom would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

1. Fiduciary Services are:

- Freedom has discretionary authority and will make the final decision regarding the initial selection, retention, removal and addition of investment options in accordance with the Plan's investment policies and objectives.
- Assist the plan sponsor with the selection of a broad range of investment options and the regulations thereunder.
- Assist the plan sponsor in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan.

- Provide discretionary investment advice to the Plan Sponsor with respect to the non-qualified default investment alternative (QDIA) for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The plan sponsor retains the sole responsibility to select the investment vehicle for the QDIA and to provide all notices to the Plan participants as required.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. plan sponsor understands the Freedom's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Freedom is not providing fiduciary advice to the Plan participants. Freedom will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.

Freedom may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Freedom and plan sponsor.

3. Freedom has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Freedom under this Agreement.ERISA PLAN SERVICES

Freedom provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans. Freedom may act as either a 3(21) or 3(38) advisor:

**Limited Scope ERISA 3(21) Fiduciary.** Freedom may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor Freedom has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using Freedom can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide investment advice to the Client about asset classes and investment alternatives available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. Freedom acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).



- Assist the Client in the development of an investment policy statement (“IPS”). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands Freedom’s assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor’s definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, Freedom is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. Freedom will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Freedom may provide these services or, alternatively, may arrange for the Plan’s other providers to offer these services, as agreed upon between Freedom and Client.

3. Freedom has no responsibility to provide services related to the following types of assets (“Excluded Assets”):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to Freedom on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

**ERISA 3(38) Investment Manager.** Freedom can also act as an ERISA 3(38) Investment Manager in which it has discretionary management and control of a given retirement plan's assets. Freedom would then become solely responsible and liable for the selection, monitoring and replacement of the plan's investment options.

1. Fiduciary Services are:

- Freedom has discretionary authority and will make the final decision regarding the initial selection, retention, removal and addition of investment options in accordance with the Plan's investment policies and objectives.
- Assist the Client with the selection of a broad range of investment options consistent with ERISA Section 404(c) and the regulations thereunder.
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan.
- Provide discretionary investment advice to the Plan Sponsor with respect to the selection of a qualified default investment alternative for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5).

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment alternatives available to them under the Plan. Client understands the Freedom's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, the Freedom is not providing fiduciary advice as defined by ERISA to the Plan participants. Freedom will not provide investment advice concerning the prudence of any investment option or combination of investment options for a particular participant or beneficiary under the Plan.
- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

Freedom may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between Freedom and Client.

3. Freedom has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in calculation of Fees paid to the Adviser on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

---

**Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

---

**Wrap Fee Programs**

Freedom does not sponsor any wrap fee programs.

---

**Client Assets under Management**

Freedom has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$255,792,124	\$8,000,956	December 31, 2023

---

**Item 5: Fees and Compensation**

---

**Method of Compensation and Fee Schedule****ASSET MANAGEMENT**

Freedom charges an annual investment advisory fee based on the total assets under management as follows when utilizing the Betterment Investment platform:

Assets Under Management	Freedom Annual Fee	Betterment Annual Fee	Total Annual Fee
\$50,000 to \$249,999	0.75%	0.20%	0.95%
\$250,000 to \$499,999	0.60%	0.20%	0.80%
\$500,000 and Over	0.50%	0.20%	0.70%

The annual fee is negotiable. Fees will be prorated and billed monthly in arrears, based on the Client's average daily balance for the prior month. Fees will be automatically deducted from your account. As part of this process, you understand and acknowledge the following:

- Betterment Securities as the custodian sends statements at least monthly to Clients showing all disbursements for their account, including the amount of the advisory fees paid to Freedom;
- The Client has provided authorization permitting fees to be directly paid by these terms;
- Betterment calculates the advisory fees and deducts them from the Client's account. The fees are based on an average daily balance of the Client's account. Client will see the total fee of no more than 0.95% (to include Betterment for Advisors platform fee of 0.20% in addition to the asset management fee charged by Freedom of 0.75%).

The investment advisory fee will be billed directly to the Custodian. Freedom will not be compensated based on the basis of a share of capital gains or capital appreciation of the assets in the Account.

#### NON-QUALIFIED DEFERRED COMPENSATION PLANS

The annual fee for services shall be calculated as an annual investment advisory fee of no more than 1% of the total assets under management. The annual fee is negotiable and may be charged as a percentage of the Included Assets or as a flat fee. Freedom considers cash to be an asset class, and as such is included in fee calculations. Also, to be noted, at times fees may exceed the money market yield.

Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the Non-Qualified Deferred Compensation Plan Agreement is terminated prior to the end of the fee period, Freedom shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the fee period.

The fee schedule, which includes compensation of Freedom for the services is described in detail in Schedule A of the Non-Qualified Deferred Compensation Plan Agreement. The Plan is obligated to pay the fees; however, the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Freedom does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Freedom will disclose this compensation, the services rendered, and the payer of compensation. Freedom will offset the compensation against the fees agreed upon under this Agreement.

#### ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. The annual fee is negotiable and may be charged as a percentage of the Included Assets and/or as a flat fee. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, Freedom shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of Freedom for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. Freedom does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, Freedom will disclose this compensation, the services rendered, and the payer of compensation. Freedom will offset the compensation against the fees agreed upon under the Agreement.

---

**Client Payment of Fees**

Fees for asset management services are deducted from a designated Client account to facilitate billing or they may pay Freedom directly. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA services will either be deducted from Plan assets or paid directly to Freedom. The Client must consent in advance to direct debiting of their investment account.

---

**Additional Client Fees Charged**

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Freedom does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Freedom. For more details on the brokerage practices, see Item 12 of this brochure.

---

**Prepayment of Client Fees**

Fees for ERISA 3(21) and/or 3(38) services may be billed in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Freedom.

---

**External Compensation for the Sale of Securities to Clients**

Investment Advisor Representatives of Freedom receive external compensation from sales of investment related products such as insurance as licensed insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures and Freedom's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

---

**Item 6: Performance-Based Fees and Side-by-Side Management****Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Freedom does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for Freedom to recommend an investment that may carry a higher degree of risk to the Client.

---

**Item 7: Types of Clients****Description**

Freedom generally provides investment advice to individuals, high net worth individuals, trusts, estates, corporations or business entities. Client relationships vary in scope and length of service.

---

**Account Minimums**

Freedom requires a minimum of \$50,000 to open an account. In certain instances, the minimum account size may be lowered or waived.

---

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

---

**Methods of Analysis**

Security analysis methods may include fundamental analysis, technical analysis and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

---

**Investment Strategy**

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Freedom. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

---

**Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Freedom:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency

risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.

---

## **Item 9: Disciplinary Information**

---

### **Criminal or Civil Actions**

Freedom and its management have not been involved in any criminal or civil action.

---

### **Administrative Enforcement Proceedings**

Freedom and its management have not been involved in administrative enforcement proceedings.

---

### **Self- Regulatory Organization Enforcement Proceedings**

Freedom and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of Freedom or the integrity of its management.

---

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

---

### **Broker-Dealer or Representative Registration**

Freedom is not registered as a broker-dealer and no affiliated representatives of Freedom are registered representatives of a broker-dealer.

---

### **Futures or Commodity Registration**

Neither Freedom nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

---

### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Managing Member Shane Hansen is a licensed insurance agent and real estate agent. Less than 2% of his time is spent on these activities. He will offer Clients insurance products or refer Clients to other insurance agents or real estate agents and receive separate compensation.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and Freedom's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or real estate agent of their choosing.

Member Cristina Hansen is a licensed insurance agent. Less than 1% of her time is spent on these activities. She will offer Clients insurance products or refer Clients to other insurance agents and receive separate compensation.



These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and Freedom's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

---

**Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

Freedom utilizes the services of Betterment as described in Items 4 and 5 of this brochure. Freedom will utilize the services of Model Portfolio Providers on the Betterment platform to manage Client investment portfolios. Model Portfolio Providers will maintain the models or investment strategies. Freedom will be responsible for the overall direct relationship with the Client. Freedom retains the authority to change the Model Portfolio Providers at Freedom's discretion.

Freedom receives their investment advisory fee as detailed in Item 5 when utilizing the Betterment platform and doesn't receive any additional compensation. The investment management fees charged by Betterment are exclusive of, and in addition to, Freedom's investment advisory fee.

---

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

---

**Code of Ethics Description**

The affiliated persons (affiliated persons include employees and/or independent contractors) of Freedom have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Freedom affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Freedom. The Code reflects Freedom and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Freedom's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Freedom may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Freedom's Code is based on the guiding principle that the interests of the Client are our top priority. Freedom's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or

non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Freedom will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

---

**Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Freedom and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

---

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

Freedom and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Freedom with copies of their brokerage statements.

The Chief Compliance Officer of Freedom is Shane Hanson. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not front run or disadvantage trading for Clients.

---

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

Freedom does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Freedom with copies of their brokerage statements.

The Chief Compliance Officer of Freedom is Shane Hanson. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not front run or disadvantage trading for Clients.

---

**Item 12: Brokerage Practices**

---

**Factors Used to Select Broker-Dealers for Client Transactions**

Freedom does not recommend the use of a particular broker-dealer and utilizes the broker-dealer required by Betterment.

- *Research and Other Soft Dollar Benefits*  
Freedom does not receive soft dollar benefits.
- *Brokerage for Client Referrals*  
Freedom does not receive Client referrals from any custodian in exchange for using that broker-dealer.
- *Directed Brokerage*  
Freedom does not allow for Client directed brokerage.

---

**Aggregating Securities Transactions for Client Accounts**

Freedom manages each account separately, and therefore, does not aggregate purchases and sales and other transactions. If orders are not aggregated, some Clients purchasing securities around the same time may receive a less favorable price than other Clients which may cost Clients more money.

---

**Item 13: Review of Accounts**

---

**Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory****Persons Involved**

Account reviews are performed quarterly by the Chief Compliance Officer of Freedom, Shane Hanson. Account reviews are performed more frequently when market conditions dictate. 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.

---

**Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

---

**Content of Client Provided Reports and Frequency**

Clients receive written account statements no less than monthly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs.

---

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

---

**Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

Freedom does not receive any economic benefits from external sources.

---

**Advisory Firm Payments for Client Referrals**

Freedom may, from time to time, enter into agreements with individuals and organizations ("referring party") that refer Clients to Freedom in exchange for compensation. This activity will either be considered an endorsement or testimonial, depending on if the referring party is a Client of Freedom. For all Clients introduced by a referring party, Freedom may pay that referring party a fee pursuant to a previously executed agreement. While the specific terms of each agreement may differ, the compensation will be based upon Freedom's engagement of new Clients and is calculated using a fixed fee, or a varying percentage of the fees paid to Freedom by such Clients. Any such fee shall be paid solely from Freedom's investment management fee and shall not result in any additional charge to the Client. Freedom ensures that referring parties are registered with all appropriate jurisdictions or exempt from registration as investment advisers or investment adviser representatives.

Each referred Client to Freedom under such an arrangement will receive a copy of this brochure and a written disclosure clearly and prominently disclosing if the referring party is a current Client or investor, the compensation that will be paid by Freedom to the

referring party and any material conflicts of interest. The referring party is required provide this disclosure at the time the endorsement or testimonial is disseminated and will obtain the Client's signature acknowledging receipt of Freedom's disclosure brochure and the written disclosure.

## **Item 15: Custody**

---

### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least monthly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Freedom.

Freedom is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Freedom.

## **Item 16: Investment Discretion**

---

### **Discretionary Authority for Trading**

Freedom requires discretionary authority to manage securities accounts on behalf of Clients. Freedom has the authority 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. The Client will authorize Freedom discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

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

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

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

---

### **Proxy Votes**

Freedom does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Freedom will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

## **Item 18: Financial Information**

---

### **Balance Sheet**

A balance sheet is not required to be provided to Clients because Freedom does not serve as a custodian for Client funds or securities and Freedom does not require prepayment of fees of more than \$1200 per Client and six months or more in advance.

---

**Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

Freedom has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

---

**Bankruptcy Petitions during the Past Ten Years**

Freedom has not had any bankruptcy petitions in the last ten years.

Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Shane Hanson



**Freedom Fiduciaries LLC**

**Office Address:**

300 E Mallard Dr. Ste 100  
Boise, ID 83706

**Tel:** 208-900-4331

**Email:** [shane@freedomfiduciaries.com](mailto:shane@freedomfiduciaries.com)

**Website:** [Freedomfiduciaries.com](http://Freedomfiduciaries.com)

March 13, 2024

This brochure supplement provides information about Shane Hanson and supplements the Freedom Fiduciaries LLC brochure. You should have received a copy of that brochure. Please contact Shane Hanson if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT SHANE HANSON (CRD #6053274)  
IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV)**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

---

#### Principal Executive Officer – Shane Hanson

- Year of birth: 1987
- 

#### Item 2 - Educational Background and Business Experience

##### Educational Background:

- Chaminade University of Honolulu; BA – Communications; 05/2011

##### Business Experience:

- Freedom Fiduciaries LLC; Managing Member/CCO/Investment Advisor Representative; 04/2023 – Present
  - Empower Financial Services, Inc.; Regional Sales Director; 06/2020 – 04/2023
  - Voya Financial Partners, LLC; Regional Vice President/Registered Representative; 01/2018 – 05/2020
  - Prudential Insurance Company of America; VP, Sales; 11/2016 – 12/2017
  - Prudential Investment Management Services LLC; Registered Representative; 11/2016 – 12/2017
  - CUNA Brokerage Services, Inc.; Registered Representative; 03/2015 – 10/2016
  - OneAmerica Securities, Inc.; Registered Representative; 06/2013 – 02/2015
  - American United Life; Field Sales Consultant; 05/2013 – 02/2015
  - Pensionmark Retirement Group; Sales Desk; 03/2012 – 06/2013
- 

#### Item 3 - Disciplinary Information

Mr. Hanson **has never been** involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:

- Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
- Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- Was found to have been involved in a violation of an investment-related statute or regulation; or
- Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

Mr. Hanson **never had** an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:

- Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
- Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

Mr. Hanson **has never been** the subject of a self-regulatory organization (SRO) proceeding in which he:

- Was found to have caused an investment-related business to lose its authorization to do business; or
- Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Mr. Hanson has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

---

#### **Item 4 - Other Business Activities**

Mr. Hanson is a licensed insurance agent and real estate agent. Less than 2% of his time is spent on these activities. He will offer Clients insurance products or refer Clients to other insurance agents or real estate agents and receive separate compensation.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and Freedom's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or real estate agent of their choosing.

---

#### **Item 5 - Additional Compensation**

Mr. Hanson does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

---

#### **Item 6 - Supervision**

Mr. Hanson is Chief Compliance Officer of Freedom. He is responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in Freedom's Compliance Manual. He can be reached at [shane@freedomfiduciaries.com](mailto:shane@freedomfiduciaries.com) or 208-900-4331.



Item 1 Cover Page

**SUPERVISED PERSON BROCHURE**  
FORM ADV PART 2B

Cristina Hansen



**Freedom Fiduciaries LLC**

**Office Address:**

300 E Mallard Dr. Ste 100  
Boise, ID 83706

**Tel:** 208-900-4331

**Email:** [cristina@freedomfiduciaries.com](mailto:cristina@freedomfiduciaries.com)

**Website:** [Freedomfiduciaries.com](http://Freedomfiduciaries.com)

March 13, 2024

This brochure supplement provides information about Cristina Hansen and supplements the Freedom Fiduciaries LLC brochure. You should have received a copy of that brochure. Please contact Cristina Hansen if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT CRISTINA HANSEN (CRD #6220831) IS AVAILABLE ON THE SEC'S WEBSITE AT [WWW.ADVISERINFO.SEC.GOV](http://WWW.ADVISERINFO.SEC.GOV).**

## Brochure Supplement (Part 2B of Form ADV)

### Supervised Person Brochure

---

#### Supervised Person – Cristina Hansen

- Year of birth: 1986
- 

#### Item 2 - Educational Background and Business Experience

##### Educational Background:

- Boise State University; BBA – International Business; 05/2011

##### Business Experience:

- Freedom Fiduciaries LLC; Member/Investment Advisor Representative; 04/2023 – Present
  - Sanctuary Wealth Management, LLC; Investment Advisor Representative; 04/2023 – 02/2024
  - Sanctuary Wealth Management, LLC; Investment Advisor Representative; 12/2022 – 04/2023
  - Pensionmark Financial Group; Client Relationship Manager; 01/2013 – 12/2022
- 

#### Item 3 - Disciplinary Information

Ms. Hansen **has never been** involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which she:

- Was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
- Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
- Was found to have been involved in a violation of an investment-related statute or regulation; or
- Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, her from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.

Ms. Hansen **has never** had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which she:

- Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
- Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending her association with an

investment-related business; (c) otherwise significantly limiting her investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on her.

Ms. Hansen **has never been** the subject of a self-regulatory organization (SRO) proceeding in which she:

- Was found to have caused an investment-related business to lose its authorization to do business; or
- Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.

Ms. Hansen **has not been** involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

---

**Item 4 - Other Business Activities**

Ms. Hansen is a licensed insurance agent. Less than 1% of her time is spent on these activities. She will offer Clients insurance products or refer Clients to other insurance agents and receive separate compensation.

These practices represent a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and Freedom's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

---

**Item 5 - Additional Compensation**

Ms. Hansen does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

---

**Item 6 - Supervision**

Shane Hanson is Chief Compliance Officer of Freedom. Shane Hanson reviews Ms. Hansen's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Shane Hanson can be reached at [shane@freedomfiduciaries.com](mailto:shane@freedomfiduciaries.com) or 208-900-4331.