



Portfolio Medics, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 07, 2024

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Portfolio Medics, LLC (“Portfolio Medics” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (239) 444-1766.

Portfolio Medics is an Investment Advisor registered with the Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Portfolio Medics to assist you in determining whether to retain the Advisor.

Additional information about Portfolio Medics and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 145958.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Portfolio Medics.

Portfolio Medics believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its clients with complete and accurate information at all times. Portfolio Medics encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

Since its last disclosure of material changes of March 2023, one new material change has occurred. Assets under management (AUM) have increased to \$497,609,065.00 as of December 2023.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Portfolio Medics.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our firm CRD# 145958. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (239) 444-1766.

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Item 4 – Advisory Services

A. Firm Information

Portfolio Medics, LLC (“Portfolio Medics” or the “Advisor”) is an SEC registered investment advisor located in the State of Florida. Portfolio Medics is organized as a Limited Liability Company (LLC) under the laws of Florida. Portfolio Medics was founded in December 2007, and is owned and operated by John M. Billy Jr. (Managing Member and Chief Compliance Officer) and John C. Conrath (Managing Member). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Portfolio Medics.

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

B. Advisory Services Offered

Portfolio Medics offers investment advisory services to individuals, high net worth individuals, small businesses, retirement plans and charitable organizations in Florida and other states.

Investment Management Services

Portfolio Medics provides customized investment management solutions for its clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and consulting services. Portfolio Medics works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation, which may include investments in investment strategies or portfolios. Portfolio Medics’ Investment Strategies or Portfolios generally consist of diversified mutual funds, exchange-traded funds (“ETFs”), individual stocks, bonds, leveraged funds, variable annuities, independent managers, and other types of investments to achieve the Client’s investment goals. Portfolio may also use mutual funds offered by Dimensional Fund Advisors LP (“DFA”). DFA mutual funds follow a passive asset class investment philosophy with low holdings turnover. The DFA fund fees are generally lower than fees and expenses charged by other fund providers. The Advisor is under no obligation to recommend DFA funds to Clients and do so only when it is believed to be in the Client’s best interest.

The Advisor will utilize one or more of the following investment strategies or portfolios to implement the Client’s investment needs:

- Advisor Managed Portfolios (AMP)
- Diversified Fund Allocation (DFA) Portfolios
- Market Trend Strategy (MTS)
- Fee Simple Portfolios

The construction of the investment strategies or portfolios will be determined by the needs and objectives of each Client. The full details regarding investment strategies or portfolios are discussed with the Client prior to the engagement of investment management services.

Portfolio Medics’ investment strategies or portfolios can be short-term or long-term focused. The Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the investment strategies or portfolios for the Client, or due to market conditions. Portfolio Medics will construct, implement and monitor the investment strategies or portfolios to ensure they meet the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Please Note: Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective investment strategies or portfolios, but each request is subject to acceptance by the Advisor.

Portfolio Medics evaluates and selects investments for inclusion in investment strategies or portfolios only after applying its internal due diligence process. Portfolio Medics may recommend, on occasion, redistributing investment allocations to diversify the investment strategies or portfolios. Portfolio Medics may sell positions for reasons that include, but not limited to, harvesting capital gains or losses, business or sector risk exposure,

change in the Client's risk tolerance, generating cash to meet the Client's needs, or any risk deemed unacceptable for the Client's risk tolerance.

Use of Independent Managers - Portfolio Medics may recommend that a Client utilize one or more unaffiliated investment managers or investment platforms (collectively "Independent Managers") for all or a portfolio of a Client's investment portfolio. In such instances, the Client may be required to authorize enter into an advisory agreement with the Independent Manager[s] that defines the terms in which the Independent Manager[s] will provide investment management and related services. The Advisor may also assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will perform initial and ongoing oversight and due diligence over the selected Independent Manager[s] to ensure the Independent Managers' strategies and target allocations remain aligned with its clients' investment objectives and overall best interests. The Client, prior to entering into an agreement with unaffiliated investment manager[s] or investment platform[s], will be provided with the Independent Manager's Form ADV 2A (or a brochure that makes the appropriate disclosures).

At no time will Portfolio Medics accept or maintain custody of a client's funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices and Item 15 - Custody.

Financial Planning Services

Portfolio Medics provides a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a client's financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services will involve preparing a financial plan based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs and other areas of a client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs. Portfolio Medics may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

Signal Services

Portfolio Medics LLC, provides trading signals through Herbert Friedman.

C. Client Account Management

Prior to engaging Portfolio Medics to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the parties. These services may include:

- Asset Allocation – Portfolio Medics will allocate Client assets to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Portfolio Medics will develop and or allocate Clients to a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Portfolio Medics will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Portfolio Medics does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Portfolio Medics.

E. Assets Under Management

As of December 31, 2022, Portfolio Medics manages the following assets:

Discretionary Assets	\$489,974,877.00
Non-Discretionary Assets	\$7,634,188.00
Total Assets Under Management	\$497,609,065.00

Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall one or more agreements that detail the responsibilities of Portfolio Medics and the Client. The Advisor also receives compensation from certain legacy Clients that may be engaged for a service that is no longer offered to Clients based on their agreements with the Advisor.

A. Fees for Advisory Services

Investment Management Services

Investment management fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the investment management agreement. Investment management fees are based on the market value of assets under management at the end of each quarter. Investment management fees for each portfolio are described below:

Advisor Managed Portfolios (AMP)

AMP fees are paid quarterly in arrears and are based off of the following schedule:

Assets Under Management	Annual Rate
Up to \$10,000,000	2.60%
\$10,000,001 and Over	Negotiable

Diversified Fund Allocation (DFA)

DFA fees are paid quarterly in arrears and are based off of the following schedule:

Assets Under Management	Annual Rate
Up to \$10,000,000	1.00%
\$10,000,001 and Over	Negotiable

Market Trend Strategy (MTS)

MTS fees are paid quarterly in arrears and are based off of the following fee schedule:

Assets Under Management	Annual Rate
Up to \$10,000,000	1.50%
\$10,000,001 and Over	Negotiable

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The investment management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Portfolio Medics will be independently valued by the Custodian. Portfolio Medics will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee will often be deducted from the Client's account[s] with the respective Independent Manager and a portion of the fee will be provided to Portfolio Medics based on Portfolio Medics' agreement with the Client or pursuant to the Advisor's agreement with the Independent Manager. Portfolio Medics is responsible for negotiating the fees with the Independent Manager on behalf of the Client. Portfolio Medics does not receive any compensation or fees from the Independent Manager.

Financial Planning Services

Portfolio Medics offers financial planning services either for a fixed fee or on an hourly basis. Fixed fees range from \$125 to \$5,000 and hourly fees are \$250 per hour. Fee may be negotiable depending on the nature and complexity of each Client's circumstances. An estimate for total hours will be provided prior to engaging for these services. Variable fees may be applied when providing Clients with ongoing investment advice.

Portfolio Medics may also be engaged for ongoing financial consulting support, payable through an annual fee. Annual fees are payable at the beginning of each quarter and based on the amount of assets advised upon. The Advisor generally requires a minimum portfolio size of \$150,000, where an annual fee of \$1,000 (\$250 quarterly) would apply. For each additional \$50,000 advised upon, the annual fee will increase by \$500 per year (\$125 a quarter), pursuant to the agreement.

Signal Service Fee

Portfolio Medics, LLC may also act as a signal provider (providing proprietary trading information called signals to other investment advisors to purchase or sell security positions based on analysis at their sole discretion) to affiliated and unaffiliated third-party advisors. Portfolio Medics, LLC would receive a fixed asset-based fee according to assets under advisement payable by the third-party advisor. The fees charged are negotiable and will not exceed any limit imposed by any regulatory agency. This relationship will be memorialized in each contract between Portfolio Medics, LLC and the third-party advisor.

The unaffiliated third-party advisor may terminate the signal service agreement with or without cause at any time upon written notice to Portfolio Medics, LLC at least 24 hours in advance of the next trading session. Portfolio Medics, LLC may terminate the agreement with or without cause at any time upon one week's prior written notice to the unaffiliated third-party advisor. The unaffiliated third-party advisor will pay the prorated portion of the fees as of the termination date. The termination of the unaffiliated third party by its client will automatically terminate Portfolio Medics, LLC's role as the signal provider.

B. Fee Billing

Investment Management Services

Investment management fees will be deducted from the Client account[s] at the Custodian. For other services that are available to the Client, the Advisor may invoice fees separately. The Advisor shall approve and/or calculate the fee and send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Portfolio Medics at the end of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian, where applicable, reflecting deduction of the investment management fee. In addition, the Advisor and/or Custodian will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's

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account statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Portfolio Medics to be paid directly from their accounts held by the Custodian as part of the investment management agreement and/or separate account forms provided by the Custodian.

Signal Provider Services

Signal fees are payable by third party advisors applying fixed basis points to assigned assets, and not by their clients directly. Third party advisors may be invoiced for such fees, as provided by contract between Portfolio Medics and the applicable third-party advisor. Signal service fees are negotiable annually of signal applied assets, ranging depending on the number of clients/assets and complexity of selected trading programs.

Use of Independent Managers

For Clients referred by the Advisor to an Independent Manager, the Client's fee may be separately billed or deducted from the Client's account[s] with the respective manager and a portion of the investment advisory fee may be provided to Portfolio Medics.

Financial Planning Services

Financial planning fees are invoiced by the Advisor and are due upon receipt of the agreed upon deliverable[s]. Fees for ongoing financial consulting services are due at the beginning of each calendar quarter.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Portfolio Medics, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The investment management fee charged by Portfolio Medics is separate and distinct from these custody and execution fees.

In addition, all fees paid to Portfolio Medics for investment management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly without the services of Portfolio Medics but would not receive the services provided by Portfolio Medics which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Portfolio Medics to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Investment Management Services

Portfolio Medics is compensated for its services at the end of the quarter, after investment management services are rendered. Either party may request to terminate the investment management agreement with Portfolio Medics, at any time by providing advance written notice to the other party. The Client may also terminate the investment planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for investment management fees up to and including the effective date of termination to the end of the quarter. The Client's investment management agreement with the Advisor is non-transferable without the Client's prior consent.

Use of Independent Managers

In the event that a client should wish to terminate their relationship with the Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and that Independent Manager. Portfolio Medics will assist the Client with the termination and transition as appropriate.

Financial Planning Services

Portfolio Medics offers ongoing financial planning services as a perpetual engagement. Financial planning agreements intended as perpetual will be ongoing in nature and continue until terminated by either party. Fees for

ongoing financial planning services are due at the beginning of each quarter, before services are rendered. Either party may terminate a planning agreement at any time by providing written notice to the other party. In addition, the Client may also terminate the agreement within five (5) days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid financial planning fees from the effective date of termination to the end of the quarter. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Portfolio Medics does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment management fees noted above. Certain advisory persons may offer insurance products in their separate capacities. Please see Item 10.

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

Portfolio Medics does not charge performance-based fees for its investment management services. The fees charged by Portfolio Medics are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

Portfolio Medics does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its clients.

Item 7 – Types of Clients

Portfolio Medics provides investment advisory service to individuals, high net worth individuals, small businesses, and retirement plans and charitable organizations. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Portfolio Medics imposes a minimum relationship size of \$150,000 for services, which may be waived at the sole discretion of the Advisor.

Item 8 – Methods of Analysis, Investment Strategies and Material Risk of Loss

1. Methods of Analysis

Portfolio Medics's methods of analysis include fundamental analysis, technical analysis and cyclical analysis. Each of these methods may be assessed using quantitative measures, and the weightings of the methods themselves may vary over time.

- A. Fundamental analysis** involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.
- B. Technical analysis** involves the analysis of past market data; primarily price and volume.
- C. Cyclical analysis** involved the analysis of business cycles to find favorable conditions for buying and/or selling a security.

Investment Strategies

Portfolio Medics may use short-term trading, short sales for hedging purposes, margin transactions, and options writing (limited to covered options, or spreading strategies).

Portfolio Medics may also employ a breadth of strategies from longer-term/strategic approaches, to more short-to intermediate-term/tactical approaches, as matched to client goals and objectives.

- A. Strategic Approach.** Strategic asset allocation is a target allocation of asset classes a client may expect to have in place for a long period of time. Asset allocation explains how an investor may divide their money into various categories, such as stocks, bonds, and cash. The target allocation is expected to remain relatively the same within identified bounds and the portfolio would be re-balanced back to the appropriate allocation as needed. Strategic asset allocation looks more at the overall risk of the portfolio, and therefore takes a long-term view.
- B. Tactical Approach.** Tactical asset allocation is a short to intermediate term view that looks for investment opportunities in the market. Tactical allocation allows an investor to move into and out of, or overweight and underweight certain areas of the market.

2. Material Risk Involved

- A. 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.
- B. 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 work long term.
- C. 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 two-fold: 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

Investment Strategies

- A. Short-term trading**, where buying and selling of positions is within a short time range with the desire to capitalize on the movement of the position.

These strategies generally hold greater risks and clients should be aware that there is a commensurately greater material risk of loss using any of the strategies, if employed. Shorter-term approaches also feature increased trading costs and taxes, which reduce total returns.

Investing in securities applying any strategy generally involves a significant risk of loss that you, as a client, should be prepared to bear. The adviser's approaches may not be suitable for all investors. All investing is risky and past performance, whether actual or tested, is no guarantee of future results or profitability.

3. Risk of Specific Securities Utilized

Mutual Funds: Investing in mutual funds carries the risk of capital loss. Mutual funds are not guaranteed or insured by the FDIC or any other government agency. You can lose money investing in mutual funds. All mutual funds have internal costs that lower investment returns. They can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

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

Bonds: Investment in bonds carries risk associated with interest rate fluctuation, credit ratings, liquidity and

inflation.

Exchange Traded Funds/Notes (ETF/N): Portfolio Medics may utilize ETF/Ns to provide low-cost, diversified access to a variety of asset classes, industry sectors, and international markets. However, they may carry some unique risks. Like the underlying stocks &, bonds or other asset classes or indices in which they seek to invest. ETF/N's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding or counter-party bankruptcy, trading risk (position can be thinly traded leading to delays in execution), liquidity risk (low trading volume may cause lack of liquidity), and risk of change in Authorized Participants (may cause liquidity event because of lack or change of Authorized Participants and a possible difference between the actual trading price of the ETF/N and the NAV of the ETF/N). ETNs may also carry counter-party risk. Conflicts of interest may also arise due to Authorized Participants also holding the underlying assets that make up the ETF/N. Special risks may additionally apply to ETF/Ns that invest in commodities, derivatives or utilize inverse or levered positions, which are noted specifically below:

Short-Term Trading: Risks include liquidity, price stability, increased transaction and taxation costs.

Inverse Funds: Risks include the upward trend of the market and the possibility of loss. The use of inverse funds is an investment strategy with a high level of inherent risk.

Leveraged Funds: Risk for traders based on leveraged funds can be described as the risk of losing more in exchange for the potential of gaining as much. Before purchasing funds using leverage, it is important to understand this risk and to be willing to accept it or, if not, to avoid levered trading altogether.

Please Note - Inverse/ Enhanced Market Strategies: As described above, Portfolio Medics may utilize long and inverse mutual funds and/or ETF/Ns that are designed to perform in either an: (1) inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and/or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of more than 1 times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. Enhanced or leveraged strategies come with additional and significant risk as losses are magnified as the daily compounding factor can have a detrimental impact on the owner for the shares. There can be no assurance that any such strategy will prove profitable or successful. Considering these enhanced risks/rewards, a client may direct Portfolio Medics, in writing, not to employ any or all such strategies for their account(s).

A. Methods of Analysis

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Portfolio Medics or its Officers. Portfolio Medics values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with our firm name or our CRD# 145958.

Item 10 – Other Financial Industry Activities and Affiliations

Portfolio Medics is required to disclose any relationships or arrangement that is material to its advisory business or to its clients. Portfolio Medics has the following relationships to disclose:

Insurance Agency Affiliations

Certain Advisory Persons of Portfolio Medics are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from the Advisory Person's role with the Advisor. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. Advisory Persons are not required to offer the products of any particular insurance

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company. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by an Advisory Person or the Advisor.

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

A. Code of Ethics

Portfolio Medics has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons subject to the Advisor’s compliance program (herein “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Portfolio Medics and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Portfolio Medics Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (239) 444-1766.

B. Personal Trading with Material Interest

Portfolio Medics allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Portfolio Medics does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Portfolio Medics does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Portfolio Medics allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Portfolio Medics may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Portfolio Medics requiring reporting of personal securities trades by its Supervised Persons to the Chief Compliance Officer (“CCO”). We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Portfolio Medics allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Portfolio Medics, or any Supervised Persons of Portfolio Medics, transact in any security to the detriment of any Client.**

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Portfolio Medics does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Portfolio Medics to direct trades to the Custodian as agreed in the investment management agreement. Further, Portfolio Medics does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Portfolio Medics does not exercise discretion over the selection of the Custodian, the Advisor will typically recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Portfolio Medics. Portfolio Medics may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation, and/or the location of the Custodian’s offices. Portfolio Medics does not receive research services, other products, or compensation as a result of recommending a Custodian that may

result in the Client paying higher commissions than those obtainable through other custodians. Portfolio Medics will generally recommend that Clients establish their account[s] at Charles Schwab Institutional, or AXOS Advisor Services. All are FINRA-registered broker-dealers and members of SIPC. The Advisor participates in the Charles Schwab Institutional program, and AXOS Advisor Services program. Charles Schwab Institutional and AXOS Advisor Services are independent and unaffiliated SEC-registered broker-dealer. Charles Schwab Institutional and AXOS Advisor Services offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. The Advisor receives some benefits from Charles Schwab Institutional or AXOS Advisor Services through its participation in the program.

Portfolio Medics maintains an institutional relationship with Charles Schwab Institutional and AXOS Advisor Services, whereby the Advisor receives economic benefits from Charles Schwab Institutional and AXOS Advisor Services. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

- 1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. **Portfolio Medics does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodians. However, the Advisor does receive certain economic benefits from the Custodians. Please see Item 14.**
- 2. Brokerage Referrals** - Portfolio Medics does not receive any compensation from any third-party in connection with the recommendation for establishing an account.
- 3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Portfolio Medics will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Portfolio Medics will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Portfolio Medics will execute its transactions through the Custodian as authorized by the Client. Portfolio Medics may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Investment Advisor Representative. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A. each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Portfolio Medics if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

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C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Portfolio Medics

Use of Independent Managers

Investment Advisor Representative may refer Clients to unaffiliated money managers, as detailed in Item 4. In such arrangements, Investment Advisor Representative has a potential conflict of interest in that Investment Advisor Representative will receive a portion of the unaffiliated money manager's fee collected from the Client for the referral of the Client and the ongoing relationship management support provided by Investment Advisor Representative.

Participation in Institutional Advisor Platform (Charles Schwab Institutional)

As disclosed under Item 12, above, the Advisor participates in Charles Schwab's Institutional customer program and the Advisor may recommend Charles Schwab Institutional to Clients for custody and brokerage services. There is no direct link between the Advisor's participation in the program and the investment advice it gives to its Clients, although the Advisor receives economic benefits through its participation in the program that are typically not available to Charles Schwab Institutional retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving the Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Advisor by third-party vendors. Charles Schwab Institutional may also have paid for business consulting and professional services received by the Advisor's related persons. Some of the products and services made available by Charles Schwab Institutional through the program may benefit the Advisor but may not benefit its Client accounts. These products or services may assist the Advisor in managing and administering Client accounts, including accounts not maintained at Charles Schwab Institutional. Other services made available by Charles Schwab Institutional are intended to help the Advisor manage and further develop its business enterprise. The benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to Charles Schwab Institutional. As part of its fiduciary duties to Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by the Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Charles Schwab Institutional for custody and brokerage services.

Participation in Institutional Advisor Platform (AXOS Advisor Services)

Portfolio Medics has established an institutional relationship with AXOS Advisor Services to assist the Advisor in managing Client account[s]. Access to AXOS Advisor Services Institutional platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at AXOS Advisor Services. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from the Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from AXOS Advisor Services: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its

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institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

B. Client Referrals from Solicitors

If a Client is introduced to Portfolio Medics by either an unaffiliated or an affiliated solicitor (herein "Solicitor"), Portfolio Medics may pay the Solicitor a referral fee. Referral fees are paid solely from Portfolio Medics investment management fee and does not result in any additional charges or higher fees to the Client. The Solicitor will provide the Client with a copy of Portfolio Medics' Disclosure Brochure along with a Solicitor's disclosure statement containing the terms and conditions of the solicitation arrangement including compensation.

Item 15 – Custody

Portfolio Medics does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Portfolio Medics to utilize the Custodian for the Client's security transactions. Portfolio Medics encourages Clients to review statements provided by the account Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 – Investment Discretion

Portfolio Medics generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Portfolio Medics. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Portfolio Medics will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Portfolio Medics does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Portfolio Medics, nor its management, have any adverse financial situations that would reasonably impair the ability of Portfolio Medics to meet all obligations to its Clients. Neither Portfolio Medics, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Portfolio Medics is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officers

The Managing Members of Portfolio Medics are John M. Billy Jr. and John C. Conrath. Information regarding the formal education and background of both Mr. Billy and Mr. Conrath is included in Item 2 of their respective Form ADV Part 2B – Brochure Supplements below.

B. Other Business Activities of Principal Officers

Mr. Billy and Mr. Conrath have additional business activities that are detailed in Item 10 - Other Financial Activities and Affiliations.

C. Performance Fee Calculations

Portfolio Medics does not charge performance-based fees for its investment management services. The fees

charged by Portfolio Medics are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Portfolio Medics or its Managing Members. Neither Portfolio Medics nor its Managing Members has ever been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Portfolio Medics or Managing Members.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Portfolio Medics or its Managing Members.***

E. Material Relationships with Issuers of Securities

Neither Portfolio Medics nor its Managing Members have any relationships or arrangements with issuers of securities.



Form ADV Part 2B – Brochure Supplement

for

**John M. Billy Jr.
Managing Member and Chief Compliance Officer**

Effective: March 07,2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John Billy (CRD# **2714279**) in addition to the information contained in the Portfolio Medics, LLC (“Portfolio Medics” or the “Advisor”) (CRD # 145958) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Portfolio Medics Disclosure Brochure or this Brochure Supplement, please contact us at (239) 444-1766.

Additional information about Mr. Billy is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2714279.

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Item 2 – Educational Background and Business Experience

John M. Billy Jr., born in 1968, is a Managing Member and Chief Compliance Officer of Portfolio Medics. Mr. Billy earned a B.S. from Ohio State University in 1993. Additional information regarding Mr. Billy's employment history is included below.

Employment History:

Managing Member and Chief Compliance Officer, Portfolio Medics, LLC	12/2007 to Present
Co-Owner, Benefits Pros, LLC	02/2012 to 12/2017
President, Proactive Financial Solutions, LLC	02/2002 to 02/2010
Registered Representative, Advanced Planning Securities, Inc.	08/2007 to 12/2008
Owner, Seniors Advocacy Alliance Inc.	01/2005 to 11/2008

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Billy. Mr. Billy has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Billy.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Billy.***

However, we do encourage you to independently view the background of Mr. Billy on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 2714279.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Billy is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Billy's role with Portfolio Medics. As an insurance professional, Mr. Billy may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Billy is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Billy or the Advisor.

Item 5 – Additional Compensation

Mr. Billy has additional business activities where compensation is received. These business activities are detailed above in Item 4 above.

Item 6 – Supervision

Mr. Billy serves as the Managing Member and Chief Compliance Officer of Portfolio Medics. Mr. Billy can be reached at (239) 444-1766.

Portfolio Medics has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Portfolio Medics. Further, Portfolio Medics is subject to regulatory oversight by various agencies. These agencies require registration by Portfolio Medics and its Supervised Persons. As a registered entity, Portfolio Medics is subject to examinations by regulators, which may be announced or unannounced. Portfolio Medics is required to periodically update the information provided

to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Billy does not have any additional information to disclose.



Form ADV Part 2B – Brochure Supplement

for

**John C. Conrath
Managing Member**

Effective: March 07, 2024

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John Conrath (CRD# **4686217**) in addition to the information contained in the Portfolio Medics, LLC (“Portfolio Medics” or the “Advisor”) (CRD # 145958) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Portfolio Medics Disclosure Brochure or this Brochure Supplement, please contact us at (239) 444-1766.

Additional information about Mr. Conrath is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4686217.

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Item 2 – Educational Background and Business Experience

John Conrath, born in 1973, is a Managing Member of Portfolio Medics. Mr. Conrath attended classes at Ohio University in Zanesville from 1990 to 1993. Additional information regarding Mr. Conrath's employment history is included below.

Employment History:

Managing Member, Portfolio Medics, LLC	12/2007 to Present
Co-Owner, Benefits Pros, LLC	02/2012 to 12/2017
Investment Advisor Representative, Advanced Planning Capital Corporation	07/2007 to 06/2015
Owner, Evertree Advisors	01/2008 to 11/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Conrath. Mr. Conrath has never been involved in any regulatory, civil or criminal action. There have been no Client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Conrath.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Conrath.***

However, we do encourage you to independently view the background of Mr. Conrath on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his individual CRD# 4686217.

Item 4 – Other Business Activities

Elder Advantage

Mr. Conrath serves as a referral source for Elder Advantage, a company that specializes in assisting individuals in reviewing and/or applying for eligibility of various federal benefits. This may cause a conflict of interest in recommending certain services of the entity, where Mr. Conrath will receive compensation for these referrals. Clients are under no obligation to implement any recommendations made by Mr. Conrath or the Advisor.

Item 5 – Additional Compensation

Mr. Conrath has additional business activities where compensation is received. These business activities are detailed above in Item 4 above.

Item 6 – Supervision

Mr. Conrath serves as a Managing Member of Portfolio Medics and is supervised by John Billy the Chief Compliance Officer. John Billy can be reached at (239) 444-1766.

Portfolio Medics has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Portfolio Medics. Further, Portfolio Medics is subject to regulatory oversight by various agencies. These agencies require registration by Portfolio Medics and its Supervised Persons. As a registered entity, Portfolio Medics is subject to examinations by regulators, which may be announced or unannounced. Portfolio Medics is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Conrath does not have any additional information to disclose.

Privacy Policy

Effective Date: March 07, 2024

Our Commitment to You

Portfolio Medics, LLC ("Portfolio Medics" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Portfolio Medics (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Portfolio Medics does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

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Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Portfolio Medics does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Portfolio Medics or the Client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Portfolio Medics does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (239) 444-1766.