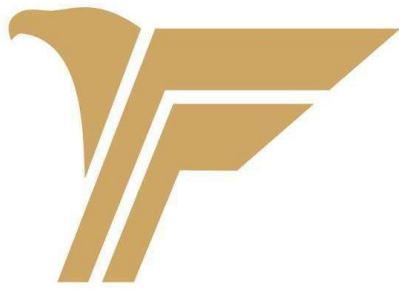


(Item 1 - Master Cover Page)



**FREEDOM  
WEALTH  
ALLIANCE**

Registered As

**Freedom Wealth Alliance, LLC  
DBA: Freedom Wealth Alliance**

A Registered Investment Adviser  
675 North Barker Road – Suite 220 | Brookfield, Wisconsin | 53045  
(262) 798-7979 – Phone  
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[www.freedomwealthalliance.com](http://www.freedomwealthalliance.com)

March 20, 2020

**NOTICE TO PROSPECTIVE CLIENTS: READ THIS DISCLOSURE BROCHURE IN ITS ENTIRETY**

All the material within this Brochure must be reviewed by those who are considering becoming a client of our firm. This Brochure provides information about the qualifications and business practices of Freedom Wealth Alliance, LLC doing business as Freedom Wealth Alliance. If you have any questions about the contents of this Brochure, please contact us at (262) 798-7979. Our e-mail address is [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com). In accordance with federal and state regulations, this Brochure is on file with the appropriate securities regulatory authorities as required. The information provided within this Brochure is not to be construed as an endorsement or recommendation by state securities authorities in any jurisdiction within the United States, or by the United States Securities and Exchange Commission. 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. Freedom Wealth Alliance is an SEC registered investment adviser. Registration of a registered investment adviser does not imply any level of skill or training. Additional information about Freedom Wealth Alliance also is available on the SEC's Web Site at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Material Changes Since Last Filing

There are no material changes to summarize based on the previous annual amendment filed in March of 2019, aside from non-content-based format changes (spacing, margins, etc.).

The solicitation agreement between Freedom Wealth Alliance and KMJ Tax and Accounting, Inc., has ended. Therefore, there are no such relationships to report on ADV Part 1

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

It is the intent of this comprehensive document to encompass Part 2A of the required ADV filing, Appendix A (Wrap Fee Program Brochure), and the Individual Disclosure Brochure for all financial advisers in the office (ADV 2B disclosures) serving in such a capacity.

Currently, our Disclosure Brochure may be requested by contacting us at (262) 798-7979. We welcome visitors to our Web Site at [www.freedomwealthalliance.com](http://www.freedomwealthalliance.com) for a comprehensive overview of our firm and the professional services we offer. The ADV document is located in the "Client Center" tab under "Useful Links" on the Freedom Wealth Alliance website.

Additional information about Freedom Wealth Alliance is also available via the SEC's Web Site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's Web Site also provides information about any persons affiliated with Freedom Wealth Alliance who are registered, or are required to be registered, as investment adviser representatives of Freedom Wealth Alliance.

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## Item 4 – Advisory Business

Freedom Wealth Alliance is an SEC registered investment adviser. The firm's founding member and owner, Kurt R. Rozman organized the firm on 02/28/2014.

Freedom Wealth Alliance provides fee-based investment advisory services primarily to individual clients and high-net worth individuals.

- The firm is a Registered Investment Adviser regulated by the SEC
- The firm is compensated based on a percentage of assets under management as well as hourly charges.
- The individuals associated with Freedom Wealth Alliance are appropriately licensed and authorized to provide advisory services on behalf of Freedom Wealth Alliance.

Advisor representatives are restricted to providing services and charging fees based in accordance with the descriptions detailed in this document and the account agreement. However, the exact service and fees charged to a client are dependent upon the representative that is working with the client. Advisors are instructed to consider the individual needs of each client when recommending an advisory platform. Investment strategies and recommendations are tailored to the individual needs of each client. Individuals associated with Freedom Wealth Alliance are also registered representatives of LPL Financial, an SEC registered broker/dealer, a member of the Financial Regulatory Authority ("FINRA") and the Securities Investors Protection Corporation ("SIPC"). Any securities transactions shall be directed to LPL Financial for execution. Freedom Wealth Alliance and LPL Financial are not affiliated legal entities.

### Asset Management

Freedom Wealth Alliance through its investment advisor representatives provides ongoing investment advice and management on assets in the client's custodial Strategic Wealth Management (SWM) account held at LPL Financial. Advisory assets also can be held with Schwab as custodian. Strategic Wealth Management is the name of the custodial account offered through LPL Financial to support investment advisory services provided by Freedom Wealth Alliance to our clients. More specific account information and acknowledgements are further detailed on the account application.

Investment advisor representatives provide advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds ("ETFs"), variable annuity subaccounts, real estate investment trusts ("REITs"), equities, and fixed income securities. The advice is tailored to the individual needs of the client based on the investment objective chosen by the client in order to help assist clients in attempting to meet their financial goals. Accounts are reviewed on a regular basis and rebalanced as necessary according to each client's investment profile.

A minimum account value of \$25,000 is generally required for the program. In certain instances, Freedom Wealth Alliance will permit a lower minimum account size.

## Optimum Market Portfolios Program (OMP)

OMP offers clients the ability to participate in a professionally managed asset allocation program using Optimum Funds Class I shares. Under OMP, client will authorize LPL Financial on a discretionary basis to purchase and sell Optimum Funds pursuant to investment objectives chosen by the client. Advisor will assist the client in determining the suitability of OMP for the client and assist the client in setting an appropriate investment objective. Advisor will have discretion to select a mutual fund asset allocation portfolio designed by LPL Financial consistent with the client's investment objective. LPL Financial will have discretion to purchase and sell Optimum Funds pursuant to the portfolio selected for the client. LPL Financial will also have authority to rebalance the account.

A minimum account value of \$15,000 is required for OMP.

## Personal Wealth Portfolios Program (PWP)

PWP offers clients an asset management account using asset allocation model portfolios designed by LPL. Advisor will have discretion for selecting the asset allocation model portfolio based on client's investment objective. Advisor will also have discretion for selecting third party money managers (PWP Advisors) or mutual funds within each asset class of the model portfolio. LPL will act as the overlay portfolio manager on all PWP accounts and will be authorized to purchase and sell on a discretionary basis mutual funds and equity and fixed income securities.

A minimum account value of \$250,000 is required for PWP.

## Model Wealth Portfolios Program (MWP)

MWP offers clients a professionally managed mutual fund asset allocation program. Freedom Wealth Alliance investment advisor representatives will obtain the necessary financial data from the client, assist the client in determining the suitability of the MWP program and assist the client in setting an appropriate investment objective. The Advisor will initiate the steps necessary to open an MWP account and have discretion to select a model portfolio designed by LPL's Research Department consistent with the client's stated investment objective. LPL Financials Research Department is responsible for selecting the mutual funds within a model portfolio and for making changes to the mutual funds selected.

The client will authorize LPL to act on a discretionary basis to purchase and sell mutual funds (including in certain circumstances exchange traded funds) and to liquidate previously purchased securities. The client will also authorize LPL Financial to effect rebalancing for MWP accounts.

In the future, the MWP program may make available model portfolios designed by strategists other than LPL Financials Research Department. If such models are made available, Advisor will have discretion to choose among the available models designed by LPL Financial and outside strategists.

A minimum account value of \$25,000 is required for MWP.

### Manager Access Select Program

Manager Access Select provides clients access to the investment advisory services of professional portfolio management firms for the individual management of client accounts. Advisor will assist client in identifying a third-party portfolio manager (Portfolio Manager) from a list of Portfolio Managers made available by LPL Financial. The Portfolio Manager manages client's assets on a discretionary basis. Advisor will provide initial and ongoing assistance regarding the Portfolio Manager selection process.

A minimum account value of \$100,000 is required for Manager Access Select, however, in certain instances, the minimum account size may be lower or higher.

The account fee charged to the client for each advisory program is negotiable, subject to the following maximum account fees set forth in the table below:

Advisory Program	Annual Percentage of Assets Charge
Asset Management	2.5%
OMP	2.5%
PWP	2.5%
MWP	2.5%
Manager Access Select	3.0%

Account fees are payable quarterly in advance. Transactions in LPL Financial advisory program accounts are generally affected through LPL Financial as the executing broker-dealer.

Neither the firm nor any investment advisor representative are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.

### Wrap Program

Freedom Wealth Alliance sponsors a wrap fee program by providing portfolio management services. Wrap fee accounts are not managed differently but Freedom Wealth Alliance receives a portion of the wrap fee for your services.

For comprehensive details, please see our Wrap Fee Program Brochure in the second main section of this document.

### Assets Under Management

As of the end of December 2018, the firm had approximately \$229,288,769 of advisory assets under management, both from a discretionary and nondiscretionary standpoint.

## Financial Planning Services

As part of our financial planning services, Freedom Wealth Alliance, through its investment advisor representatives, may provide personal financial planning tailored to the individual needs of the client. These services may include, as selected by the client on the financial planning agreement, information and recommendations regarding tax planning, investment planning, retirement planning, estate needs, business needs, education planning, life and disability insurance needs, long-term care needs and cash flow/budget planning. The services consider account information collected from the client such as financial status, investment objectives and tax status, among other data. Fees for such services are negotiable and detailed in the client agreement.

## Hourly Consulting Services

Freedom Wealth Alliance, through its investment advisor representatives, may provide consulting services on an hourly basis. These services may include, as selected by the client in the consulting agreement, advice regarding tax planning, investment planning, retirement, planning, estate planning, cash flow/budget planning, business planning, education planning, and personal financial planning. The services take into account information collected from the client such as financial status, investment objectives and tax status, among other data. The investment advisor representatives may or may not deliver to the client a written analysis or report as part of the services. The investment advisor representatives tailor the hourly consulting services to the individual needs of the client based on the investment objective chosen by the client. The engagement terminates upon final consultation with the client. Fees for such services are negotiable and detailed in the client agreement.

## Item 5 – Fees and Compensation

The specific way fees are charged by the firm is established in a client's written agreement between the client and Freedom Wealth Alliance. Clients can determine to engage the services of Freedom Wealth Alliance on a discretionary or non-discretionary basis. The firm's annual investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under the firm's management to be charged quarterly in advance, and Freedom Wealth Alliance representatives may at their discretion negotiate a fee with the client.

If applicable and agreed-upon, hourly consulting services will be based on the type of services to be provided, the experience and expertise required, and the sophistication and bargaining power of the client. The maximum hourly fee to be charged any client will not exceed \$400 without extenuating circumstances and approval by the Chief Compliance Officer.

If a client desires, a client can engage certain of the firm's representatives, in their individual capacities as registered representatives of LPL Financial, an SEC registered and FINRA/SIPC member broker-dealer, to implement investment recommendations on a commission basis. In the event a client chooses to purchase investment products through LPL Financial, LPL Financial will charge brokerage commissions to effect securities transactions, a portion of which commissions LPL Financial shall pay to the firm's representatives, as applicable. The brokerage

commissions charged by LPL Financial may be higher or lower than those charged by other broker/dealers. In addition, LPL Financial, as well as the firm's representatives, relative to commission mutual fund purchases, may also receive additional ongoing 12b-1 trailing commission compensation directly from the mutual fund company during the period that the client maintains the mutual fund investment.

The recommendation that a client purchase a commission product from LPL Financial presents a potential conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a client's need. No client is under any obligation to purchase any commission products from LPL Financial. The firm's Chief Compliance Officer, Kurt R. Rozman, is available to address any questions that a client or prospective client may have regarding this conflict of interest.

Please note, clients may purchase investment products recommended by our firm through other, non-affiliated broker dealers or agents.

The firm generally does not receive more than 5% of its revenue from advisory clients as a result of commissions or other compensation for the sale of investment products the firm recommends to its clients. When the firm's representatives sell an investment product on a commission basis, the firm does not charge an advisory fee in addition to the commissions paid by the client for such product. When providing services on an advisory fee basis, the Freedom Wealth Alliance representatives do not also receive commission compensation for such advisory services (except for any ongoing 12b-1 trailing commission compensation that may be received as previously discussed). However, a client may engage the firm to provide investment management services for an advisory fee and purchase an investment product from the firm's representatives on a separate commission basis.

Fees for customized and participant advisory services are typically based on the value of assets under management and will vary by engagement. The amount of the fee will be set out in the client agreement executed by the client at the time the relationship is established. The advisory fee is negotiable between the investment advisor representative and client and is payable either in advance or in arrears as described in the client agreement. LPL Financial is responsible for calculating and deducting advisory fees from client accounts held at LPL Financial. Client will provide LPL Financial with written authorization to deduct fees and pay the advisory fees to the RIA firm. The advisory fee is paid directly by LPL Financial to the RIA firm (not the individual). The RIA firm will then share the advisory fee with its advisors/associated persons.

A custom program account may be terminated according to the client agreement. If the client agreement provides for payment in advance, the agreement will state how the client can obtain a refund of any pre-paid fee if the agreement is terminated before the end of the billing period.

In certain cases, LPL Financial may serve as the broker-dealer on transactions in a customized advisory account. In such case, LPL Financial may charge the client transaction charges in connection with trade execution through LPL Financial. The transaction charges will be clearly stated in the client agreement executed by the client at the time the relationship is established. If the custom advisory services apply to variable annuities for which the investment advisor representative receives trail compensation, such trail fees generally will be used to offset the



advisory fee. In most cases, however, a third-party broker dealer will provide trade execution. In such case, the broker-dealer may charge clients commissions, markups, markdowns and/or transaction charges.

Advisor receives compensation as a result of a client's participation in an LPL Financial program. Depending on, among other things, the size of the account, changes in its value over time, the ability to negotiate fees or commissions, and the number of transactions, the amount of this compensation may be more or less than what the Advisor would receive if the client participated in other programs, whether through LPL Financial or another sponsor, or paid separately for investment advice, brokerage and other services.

LPL Financial serves as program sponsor, investment advisor and broker-dealer for the LPL Financial advisory programs. Freedom Wealth Alliance and LPL Financial may share in the account fee and other fees associated with program accounts. Associated persons of Advisor may also be registered representatives of LPL Financial.

Investment advisor representatives may also be licensed insurance agents. In the capacity of an insurance agent, they may recommend the purchase of certain insurance-related products on a commission basis.

The purchase a securities and/or insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend investment products based on commissions received, rather than on a client's need. No client is under any obligation to purchase any commission products from investment advisor representative of the firm. Clients may purchase investment products recommended by investment advisory representatives through other, non-affiliated broker/dealers or insurance agents.

#### Additional SWM II Cost and Fee Disclosure (Share Class)

Although clients do not pay a transaction charge for transactions in a SWM II account, clients should be aware that Freedom Wealth Alliance pays LPL transaction charges for those transactions. The transaction charges paid by Advisor vary based on the type of transaction (e.g., mutual fund, equity or ETF) and for mutual funds based on whether the mutual fund pays 12b-1 fees and/or recordkeeping fees to LPL. Transaction charges paid by the Advisor for equities and ETFs are \$9. For mutual funds, the transaction charges range from \$0 to \$26.50. Because Advisor pays the transaction charges in SWM II accounts, there could be a potential conflict of interest in cases where the mutual fund is offered at both \$0 and \$26.50. Clients should understand that the cost to Advisor of transaction charges may be a factor that Advisor considers when deciding which securities to select and how frequently to place transactions in a SWM II account.

In many instances, LPL makes available mutual funds in a SWM II account that offer various classes of shares, including shares designated as Class A Shares and shares designed for advisory programs, which can be titled, for example, as "Class I," "institutional," "investor," "retail," "service," "administrative" or "platform" share classes ("Platform Shares"). The Platform Share class offered for a mutual fund in SWM II in many cases will not be the least expensive share class that the mutual fund makes available and was selected by LPL in certain cases because the

share class pays LPL compensation for the administrative and recordkeeping services LPL provides to the mutual fund. Client should understand that another financial services firm may offer the same mutual fund at a lower overall internal cost to the investor than is available through SWM II. In other instances, a mutual fund may offer only Class A Shares, but another similar mutual fund may be available that offers Platform Shares. Class A Shares typically pay LPL a 12b-1 (internal) fee for providing brokerage-related services to the mutual funds themselves. On the other hand, Platform Shares generally are not subject to 12b-1 fees. As a result of the different expenses of the mutual fund share classes, it can be costlier for a client to own Class A Shares than Platform Shares in their portfolio. An investor in Platform Shares will pay lower internal fees over time and keep more of his or her investment returns than an investor who holds Class A Shares of the same fund.

Representatives of Freedom Wealth Alliance could technically have a financial incentive to recommend Class A Shares in cases where both Class A and Platform Shares are available. Although the client will not be charged a transaction charge for those particular transactions, Freedom Wealth Alliance pays LPL a per transaction charge for mutual fund purchases and sales in the account. Advisor generally does not pay transaction charges for Class A Share mutual fund transactions accounts either, but generally do pay transaction charges for Platform Share mutual fund transactions. The potential cost to the Financial Advisor of transaction charges could be a factor said Advisor considers when deciding which securities to select and whether to place transactions in the account.

The lack of transaction charges to Freedom Wealth Alliance for Class A Share purchases and sales, together with the fact that Platform Shares generally are less expensive for a client to own, present a potential conflict of interest between Freedom Wealth Alliance and the client. Clients should understand this and consider the additional indirect expenses borne as a result of the mutual fund fees when negotiating and discussing with your Financial Advisor the advisory fee for management of an account.

## **Item 6 – Performance-Based Fees and Side-by-side Management**

Neither the firm or any supervised persons accepts performance-based fees, fees based on a share of capital gains on or capital appreciation of the assets of a client such as a hedge fund or other pooled investment vehicle.

## **Item 7 – Types of Clients**

The advisory services offered by Freedom Wealth Alliance are available for individuals, individual retirement accounts (“IRAs”), banks and thrift institutions, pension and profit-sharing plans, including plans subject to Employee Retirement Income Security Act of 1974 (“ERISA”), trusts, estates, charitable organizations, state and municipal government entities, corporations and other business entities.

The firm generally provides investment advice to individuals and high net worth individuals. The firm is currently not working with other types of clients or pursuing them as prospects but would not turn away any opportunities that may arise.

Freedom Wealth Alliance may require a minimum asset amount for financial planning, hourly consulting, participant consulting or research services. For customized advisory services, any required minimum account value will be set out in the client agreement.

For LPL's Financial Sponsored Advisory Programs account minimums are as follows:

- Asset Management: \$25,000
- Optimum Market Portfolios Program (OMP): \$15,000
- Personal Wealth Portfolios Program (PWP): \$250,000
- Model Wealth Portfolios Program (MWP): \$100,000
- Manager Access Select Program (MAS): \$100,000 (in certain instances, the minimum account size may be lower or higher).

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

We emphasize continuous and regular account supervision. As part of our asset management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds ("ETFs"), options, mutual funds and other public and private securities or investments.

The client's individual investment strategy is tailored to their specific needs and may include some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client's circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least quarterly and if necessary, rebalance the portfolio based upon the client's individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

The firm uses a combination of charting, fundamental and technical analysis in order to formulate investment advice when managing assets. Depending on the analysis the firm will implement a long- or short-term trading strategy based on the objectives and risk tolerance of a particular client.

Please note, investing in securities involves risk of loss that clients should be prepared to bear. There are different types of investments that involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy will be profitable or equal any specific performance level(s). Past performance is not indicative of future results.

The firms' methods of analysis and investment strategies do not represent any significant or unusual risks however all strategies have inherent risks and performance limitations such as:

- Market Risk - the risk that the value of securities may go up or down, sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.
- Interest Rate Risk - the risk that fixed income securities will decline in value because of an increase in interest rates; a bond or a fixed income fund with a longer duration will be more

sensitive to changes in interest rates than a bond or bond fund with a shorter duration.

- Credit Risk - the risk that an investor could lose money if the issuer or guarantor of a fixed income security is unable or unwilling to meet its financial obligations.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an advisory firm or the integrity of a firm's management. Any such disciplinary information for the company and the company's investment advisor representatives would be provided herein and publicly accessible by selecting the Investment Advisor Search option at <http://www.adviserinfo.sec.gov>.

There are no legal or disciplinary events to disclose currently.

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

Investment advisor representatives may also be registered representatives of LPL Financial, an unaffiliated SEC registered and FINRA/SIPC member broker/dealer. Clients may choose to engage a registered investment advisor in their capacity as a registered representative of the unaffiliated LPL Financial broker/dealer, to implement investment recommendations on a commission basis.

Representatives of our firm are insurance agents/brokers. They may offer insurance products and receive customary fees as a result of insurance sales. A conflict of interest may arise as these insurance sales may create an incentive to recommend products based on the compensation adviser and/or our supervised persons may earn and may not necessarily be in the best interests of the client.

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

Freedom Wealth Alliance maintains a Code of Ethics, which serves to establish a standard of business conduct for all employees that are based upon fundamental principles of openness, integrity, honesty and trust.

The code of ethics includes guidelines regarding personal securities transactions of its employees and investment advisor representatives. The code of ethics permits employees and investment advisor representatives or related persons to invest for their own personal accounts in the same or different securities that an investment advisor representative may purchase for clients in program accounts. This presents a potential conflict of interest because trading by an employee or investment advisor representatives in a personal securities account in the same or different security on or about the same time as trading by a client could potentially disadvantage the client. Freedom Wealth Alliance addresses this conflict of interest by requiring in its code of ethics that employees and investment advisor representatives report certain personal securities

transactions and holdings to the Chief Compliance Officer or his compliance delegate for review. This activity is reviewed on a regular and consistent basis.

An investment adviser is considered a fiduciary. As a fiduciary, it is always an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics.

However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request. A copy of the Code of Ethics is also available on the firm's website under the "Client Center" tab under "Useful Links".

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction being implemented for an advisory account, thereby preventing an employee from benefiting from transactions placed on behalf of advisory accounts.

## **Item 12 – Brokerage Practices**

Freedom Wealth Alliance receives support services and/or products from LPL Financial, many of which assist the Freedom Wealth Alliance to better monitor and service program accounts maintained at LPL Financial. These support services and/or products may be received without cost, at a discount, and/or at a negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products and services used by Advisor in furtherance of its investment advisory business operations

These support services are provided to Freedom Wealth Alliance based on the overall relationship between Freedom Wealth Alliance and LPL Financial. It is not the result of soft dollar arrangements or any other express arrangements with LPL Financial that involves the execution of client transactions as a condition to the receipt of services. Freedom Wealth

Alliance will continue to receive the services regardless of the volume of client transactions executed with LPL Financial. Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Freedom Wealth Alliance to LPL Financial or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement.

Freedom Wealth Alliance has an arrangement with LPL Financial. LPL Financial offers to independent investment advisers non-soft dollar services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some non-soft dollar benefits from LPL Financial through our participation in the program.

LPL Financial may make certain research and brokerage services available at no additional cost to our firm. These services may be directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by LPL Financial may include research reports on recommendations or other information about particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by LPL Financial to our firm in the performance of our investment decision-making responsibilities.

Although the non-soft dollar investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

As a result of receiving the services Freedom Wealth Alliance may have an incentive to continue to use or expand the use of LPL Financial services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with LPL and we have determined that the relationship is in the best interest of our firm's clients and satisfies our fiduciary obligations, including our duty to seek best execution.

LPL Financial charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). LPL Financial enables us to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. LPL Financial commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by LPL Financial may be higher or lower than those charged by other custodians and broker-dealers.

Clients may pay a commission to LPL Financial that is higher than another qualified broker dealer might charge to affect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability,

commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Neither we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are affected. We routinely recommend that a client directs us to execute through a specified broker-dealer. Our firm recommends the use of LPL Financial. Each client that chooses LPL Financial will be required to establish an account if not already done. Please note that not all advisers have this requirement.

Clients may direct their brokerage transactions at a firm other than LPL Financial. However, we may be unable to achieve more favorable executions of client transactions. Client directed brokerage may cost clients more money. For example, in a directed brokerage account, you could pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you potentially could receive less favorable prices.

### **Item 13 – Review of Accounts**

For those clients to whom Freedom Wealth Alliance provides investment supervisory services, account reviews are conducted on an ongoing basis by the Freedom Wealth Alliance principals and/or representatives. All investment supervisory clients are advised that it remains their responsibility to advise Freedom Wealth Alliance of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with their investment advisor representative on an annual basis.

Freedom Wealth Alliance may also conduct account reviews based on the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and by client request.

Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. Freedom Wealth Alliance may also provide a written periodic report summarizing account activity and performance.

### **Item 14 – Client Referrals and Other Compensation**

Freedom Wealth Alliance receives an economic benefit from LPL Financial in reimbursement for marketing related expenses. Please see detailed discussion of the categories of marketing related expenses and potential conflicts of interest in Item 12 Brokerage Practices.

Freedom Wealth Alliance may compensate outside firms for referral activities. These fees may come in the form of marketing or referral fees paid directly to that firm by Freedom Wealth Alliance. The exact compensation arrangement will vary depending on the individual firm and

factors associated with the referral. Fees are typically based on a portion of the management fees charged to clients by Freedom Wealth Alliance and paid to others who introduced said client to Freedom Wealth Alliance. In all cases, Freedom Wealth Alliance will comply with the cash solicitation rules established by the SEC, state regulators and the client disclosure requirements.

Freedom Wealth Alliance and employees may receive additional compensation from product sponsors. However, such compensation may not be tied to the sales of any products. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings with an investment advisor representative, client workshops or events, marketing events or advertising initiatives, including services for identifying prospective clients. Product sponsors may also pay for or reimburse Freedom Wealth Alliance for the costs associated with, education or training events that may be attended by Freedom Wealth Alliance employees and investment advisor representatives and for Freedom Wealth Alliance sponsored conferences and events.

### **Item 15 – Custody (LPL Financial and Charles Schwab & Co., Inc.)**

Freedom Wealth Alliance does not generally have actual or constructive custody of client funds or assets. LPL Financial will serve as the primary custodian of client assets on behalf of the Freedom Wealth Alliance. Freedom Wealth Alliance may also provide advisory services on assets held at different third-party custodians. Freedom Wealth Alliance urges you to carefully review the statements provided by the custodian and compare such official custodial records to the account statements that may be provided by Freedom Wealth Alliance.

To reiterate, in general, Advisor will not have custody of any of Client's assets. However, under certain circumstances involving Schwab accounts, Advisor may be deemed to have temporary custody of client assets during such events as wire transfers, requesting of the issuance of a check, journaling funds, or transferring liquid assets (cash) to a third party on behalf of a client. In these instances, client will appoint a main custodian for the Account. Account custodian will serve as the sole and exclusive broker/dealer with respect to processing securities transactions for the Account.

Freedom Wealth Alliance may recommend that clients establish brokerage accounts with the Schwab Advisor Services division of Schwab, a registered broker-dealer, member of SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Schwab provides Freedom Wealth Alliance with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For Freedom Wealth Alliance client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.



While, as a fiduciary, Freedom Wealth Alliance endeavors to act in its clients' best interests, Freedom Wealth Alliance's recommendation that clients maintain their assets in accounts at Schwab may be based in part on the benefit to Freedom Wealth Alliance of the availability of some of the foregoing products and services and other arrangements and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which may create a potential conflict of interest.

As mentioned above, certain associated persons of Freedom Wealth Alliance are registered representatives of Schwab. As a result of this relationship, Schwab may have access to certain confidential information (e.g., financial information, investment objectives, transactions and holdings) about Freedom Wealth Alliance clients, even if client does not establish any account through Schwab. If you would like a copy of the Schwab privacy policy, please contact Kurt Rozman at (262) 798-7979 or visit the firm's website and go to the "Client Center" tab and visit the "Useful Links" choice.

### **Item 16 - Investment Discretion**

The client can determine to engage Freedom Wealth Alliance to provide investment advisory services on a discretionary basis. Prior to the Freedom Wealth Alliance assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming the Freedom Wealth Alliance as the client's attorney and agent in fact, granting Freedom Wealth Alliance full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

Clients who engage the Freedom Wealth Alliance on a discretionary basis may, at any time, impose restrictions, in writing, on the Freedom Wealth Alliance discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe the use of margin, etc.).

### **Item 17 – Voting Client Securities**

Freedom Wealth Alliance does not vote client proxies, but third-party money managers selected or recommended by our firm may vote proxies for clients. Clients will otherwise receive their proxies or other solicitations directly from their custodian. Clients may contact Freedom Wealth Alliance at (262) 798-7979 to discuss any questions they may have with a particular solicitation.

## Item 18 – Financial Information

Freedom Wealth Alliance does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

There are no financial conditions that are reasonably likely to impair the firm's ability to meet contractual commitments to clients. At no time has Freedom Wealth Alliance been the subject of a bankruptcy petition.

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(Item 1 - Cover Page for Appendix A – Wrap Program Brochure)



**FREEDOM  
WEALTH  
ALLIANCE**

## Freedom Wealth Alliance, LLC

675 North Barker Road – Suite 220 | Brookfield, Wisconsin | 53045  
(262) 798-7979 – Phone  
(262) 798-8950 – Fax

[www.freedomwealthalliance.com](http://www.freedomwealthalliance.com)

March 20, 2020

### Appendix A - WRAP Program Brochure

This wrap fee program brochure provides information about the qualifications and business practices of Freedom Wealth Alliance, LLC. If you have any questions about the contents of this brochure, please contact Freedom Wealth Alliance, LLC at (262) 798-7979 or [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Additional information about Freedom Wealth Alliance, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Material Changes Since Last Filing

The SEC amended the format of the disclosure document required to be delivered to clients by investment advisors. This brochure, dated March 1, 2019, is a new disclosure document prepared using the new format and its requirements. Of course, the date is revised annually on all portions of this document to reflect the most recent revision of this overall document.

In the future, this section, Item 2 – Material Changes Since Last Filing, will point out material changes that have been made to the Brochure since the date of the last brochure and provide a summary of the changes.

Although there have been minor items to note, there have been no material changes in the information contained in this section of the brochure since the last filing from March 2019.

### Item 3 – Table of Contents

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## Item 4 – Services, Fees and Compensation

### Services

Freedom Wealth Alliance, LLC (“Advisor”) offers asset management services based on the individual needs of the client. This Brochure provides a description of the advisory services offered under the Freedom Wealth Alliance Wrap program. For more information about Advisor’s other investment advisory services, please contact Advisor for a copy of a similar brochure that describes such services or go to [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

In the Freedom Wealth Alliance Wrap program, Advisor provides ongoing investment advice and management on assets in the client’s account. Advisor provides advice on the purchase and sale of various types of investments, such as mutual funds, exchange-traded funds (“ETFs”), variable annuity subaccounts, equities, fixed income securities. Advisor provides advice that is tailored to the individual needs of the client based on the investment objective chosen by the client. Clients may impose restrictions on investing in certain securities or groups of securities by indicating in the written advisory agreement with Advisor.

Advisor provides management services on a discretionary basis. The client authorizes the Advisor to have discretion by signing an advisory agreement.

Assets for program accounts are held at LPL Financial (“LPL”) as custodian. LPL also acts as executing broker/dealer for transactions placed in program accounts and provides other administrative services as described throughout this Brochure.

### Fees

In the Freedom Wealth Alliance Wrap program, clients pay Advisor a single annual advisory fee for advisory services and execution of transactions. Clients do not pay brokerage commissions, markups or transaction charges for execution of transactions in addition to the advisory fee. The advisory fee is negotiable between the client and the Advisor and is set out in the advisory agreement. The advisory fee is a percentage based on the value of all assets in the account, including cash holdings. The maximum advisory fee is 2.75 %. The advisory fee may be higher than the fee charged by other investment advisors for similar services. The advisory fee is paid to Advisor and is shared between Advisor and its associated persons. Advisor does not accept performance-based fees for program accounts.

The advisory fee is deducted from the account by LPL as the custodian of assets based on a written authorization from the client. LPL calculates and deducts the advisory fee quarterly in advance. If the advisory agreement is terminated before the end of the quarterly period, client is entitled to a pro-rated refund of any pre-paid quarterly advisory fee based on the number of days remaining in the quarter after the termination date.

Although clients do not pay a transaction charge for transactions in a program account, clients should be aware that Advisor pays LPL transaction charges for the transactions. The transaction charges paid by Advisor vary based on the type of transaction (e.g., mutual fund, equity or fixed income security) and range from \$0 to \$50. Because Advisor pays the transaction charges in

program accounts, there is a conflict of interest. Clients should understand that the cost to Advisor of transaction charges may be a factor that the Advisor considers when deciding which securities to select and how frequently to place transactions in a program account.

### Other Types of Fees and Charges

Program accounts will incur additional fees and charges from parties other than the Advisor as noted below. These fees and charges are in addition to the advisory fee paid to Advisor. Advisor does not share in any portion of these third-party fees.

LPL, as the custodian and broker-dealer providing brokerage and execution services on program accounts, will impose certain fees and charges. LPL notifies clients of these charges at account opening and makes available a list of these fees and charges on its website at [www.lpl.com](http://www.lpl.com). LPL will deduct these fees and charges directly from the client's program account.

There are other fees and charges that are imposed by other third parties that apply to investments in program accounts. Some of these fees and charges are described below.

- If a client's assets are invested in mutual funds or other pooled investment products, clients should be aware that there will be two layers of advisory fees and expenses for those assets. Client will pay an advisory fee to the fund manager and other expenses as a shareholder of the fund. Client will also pay Advisor the advisory fee with respect to those assets. Most of the mutual funds available in the program may be purchased directly. Therefore, clients could generally avoid the second layer of fees by not using the management services of Advisor and by making their own investment decisions.
- Certain mutual funds impose fees and charges such as contingent deferred sales charges, early redemption fees and charges for frequent trading. These charges may apply if client transfers into or purchases such a fund with the applicable charges in a program account.
- Although only no-load and load-waived mutual funds can be purchased in a program account, client should understand that some mutual funds pay asset-based sales charges or service fees (e.g., 12b-1 fees) to the custodian with respect to account holdings.
- If client holds a variable annuity as part of an account, there are mortality, expense and administrative charges, fees for additional riders on the contract and charges for excessive transfers within a calendar year imposed by the variable annuity sponsor.

Further information regarding fees assessed by a mutual fund, or variable annuity is available in the appropriate prospectus, which is available upon request from the Advisor or from the product sponsor directly.

### Other Important Considerations

- The advisory fee is an ongoing wrap fee for investment advisory services, the execution

of transactions and other administrative and custodial services. The advisory fee may cost the client more than purchasing the program services separately, for example, paying an advisory fee plus commissions for each transaction in the account. Factors that bear upon the cost of the account in relation to the cost of the same services purchased separately include the type and size of the account, historical and or expected size or number of trades for the account, and number and range of supplementary advisory and client-related services provided to the client.

- The advisory fee also may cost the client more than if assets were held in a traditional brokerage account. In a brokerage account, a client is charged a commission for each transaction, and the representative has no duty to provide ongoing advice with respect to the account. If the client plans to follow a buy and hold strategy for the account or does not wish to purchase ongoing investment advice or management services, the client should consider opening a brokerage account rather than a program account.
- The Advisor recommending the program to the client receives compensation as a result of the client's participation in the program. This compensation includes the advisory fee and may include other compensation, such as bonuses, awards or other things of value offered by LPL to the Advisor or its associated persons. The amount of this compensation may be more or less than what the Advisor would receive if the client participated in other LPL programs, programs of other investment advisors or paid separately for investment advice, brokerage and other client services. Therefore, the Advisor may have a financial incentive to recommend a program account over other programs and services.
- The investment products available to be purchased in the program can be purchased by clients outside of a program account, through broker-dealers or other investment firms not affiliated with Advisor.

## **Item 5 – Account Requirements and Types of Clients**

A minimum account value of \$100,000 is generally required for the program. In certain instances, Advisor will permit a lower minimum account size. The program is available for individuals and High Net-Worth Individuals.

## **Item 6 – Portfolio Manager Selection and Evaluation**

In the Freedom Wealth Alliance Wrap program, Advisor does not select, review or recommend other investment advisors or portfolio managers. Advisor, through its associated persons, is responsible for the investment advice and management offered to clients. Advisor generally requires that individuals involved in determining or giving investment advice have experience with large retail bank and/or brokerage firms.

For more information about the associated person of Advisor managing the account, client should refer to the Part 2B of the ADV Brochure (Individual Disclosure Brochures) for each of the associated persons, which client should have received along with this Brochure at the time client opened the account.



LPL performs certain administrative services for Advisor, including generation of quarterly performance reports for program accounts. Client will receive an individual quarterly performance report, which provides performance information on a time weighted basis. The performance reports are intended to inform clients as to how their investments have performed for a period, both on an absolute basis and compared to leading investment indices.

## Methods of Analysis and Investment Strategies

- Alternative Strategy Mutual Funds. Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies may not be suitable for all investors and involves special risks, such as risks associated with commodities, real estate, leveraging, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.
- Closed-End Funds. Client should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds may offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients may be unable to liquidate all or a portion of their shares in these types of funds.
- Exchange-Traded Funds (ETFs). ETFs are typically investment companies that are legally classified as open-end mutual funds or UITs. However, they differ from traditional mutual funds specifically in that ETF shares are listed on a securities exchange. Shares can be bought and sold throughout the trading day like shares of other publicly-traded companies. ETF shares may trade at a discount or premium to their net asset value. This difference between the bid price and the ask price is often referred to as the "spread." The spread varies over time based on the ETF's trading volume and market liquidity and is generally lower if the ETF has a lot of trading volume and market liquidity and higher if the ETF has little trading volume and market liquidity. Although many ETFs are registered as an investment company under the Investment Company Act of 1940 like traditional mutual funds, some ETFs, in particular those that invest in commodities, are not registered as an investment company.
- Exchange-Traded Notes (ETNs). An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs may be linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar with ETFs in that they are listed on an exchange and can typically be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer's ability to pay. In addition, the trading

price of the ETN in the secondary market may be adversely impacted if the issuer's credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and may therefore carry specific risks.

- Leveraged and Inverse ETFs, ETNs and Mutual Funds. Leveraged ETFs, ETNs and mutual funds, sometimes labeled “ultra” or “2x” for example, are designed to provide a multiple of the underlying index's return, typically daily. Inverse products are designed to provide the opposite of the return of the underlying index, typically daily. These products are different from and can be riskier than traditional ETFs, ETNs and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they may not be able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to as tracking error. Continual re-setting of returns within the product may add to the underlying costs and increase the tracking error. As a result, this may prevent these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and are generally not appropriate as an intermediate or long-term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products may not be diversified and can be based on commodities or currencies. These products may have higher expense ratios and be less tax-efficient than more traditional ETFs, ETNs and mutual funds.
- Options. Certain types of option trading are permitted in order to generate income or hedge a security held in the program account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the program account. Client should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the program account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.
- Structured Products. Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent upon the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, may be adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested,

others offer only partial or no protection. Investors may be sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There may be little or no secondary market for the securities and information regarding independent market pricing for the securities may be limited.

This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products may be different from other investments held in the account (e.g., income may be taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

- Hedge Funds and Managed Futures. Hedge and managed futures funds are available for purchase in the program by clients meeting certain qualification standards. Investing in these funds involves additional risks including, but not limited to, the risk of investment loss due to the use of leveraging and other speculative investment practices and the lack of liquidity and performance volatility. In addition, these funds are not required to provide periodic pricing or valuation information to investors and may involve complex tax structures and delays in distributing important tax information. Client should be aware that these funds are not liquid as there is no secondary trading market available. At the absolute discretion of the issuer of the fund, there may be certain repurchase offers made from time to time. However, there is no guarantee that client will be able to redeem the fund during the repurchase offer.
- Variable Annuities. If client purchases a variable annuity that is part of the program, client will receive a prospectus and should rely solely on the disclosure contained in the prospectus with respect to the terms and conditions of the variable annuity. Client should also be aware that certain riders purchased with a variable annuity may limit the investment options and the ability to manage the subaccounts.
- Margin Accounts. Client should be aware that margin borrowing involves additional risks. Margin borrowing will result in increased gain if the value of the securities in the account go up, but will result in increased losses if the value of the securities in the account goes down. The custodian, acting as the client's creditor, will have the authority to liquidate all or part of the account to repay any portion of the margin loan, even if the timing would be disadvantageous to the client. For performance illustration purposes, the margin interest charge will be treated as a withdrawal and will, therefore, not negatively impact the performance figures reflected on the quarterly advisory reports.

\*\*\* It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable. Investing in securities involves the risk of loss that clients should be prepared to bear. \*\*\*

## Voting Client Securities

Advisor does not accept authority to vote client securities. Clients retain the right to vote all proxies that are solicited for securities held in the account. Clients will receive proxies or other solicitations from the custodian of assets. If clients have questions regarding the solicitation, they should contact the Advisor or the contact person that the issuer identifies in the proxy materials. In addition, Advisor does not accept authority to act with respect to legal proceedings relating to securities held in the account.

## Item 7 – Client Information Provided to Portfolio Managers

In the Freedom Wealth Alliance Wrap program, the Advisor is responsible for account management; there is no separate portfolio manager involved. The Advisor obtains the necessary financial data from the client and assists the client in setting an appropriate investment objective for the account. The Advisor obtains this information by having the client complete an advisory agreement and other documentation. Clients are encouraged to contact the Advisor if there have been any changes in the client's financial situation or investment objectives or if they wish to impose any reasonable restrictions on the management of the account or reasonably modify existing restrictions. Client should be aware that the investment objective selected for the program is an overall objective for the entire account and may be inconsistent with a particular holding and the account's performance at any time. Client should further be aware that achievement of the stated investment objective is a long-term goal for the account.

## Item 8 – Client Contact with Portfolio Managers

Client should contact Advisor at any time with questions regarding program account.

## Item 9 – Additional Information

### Disciplinary Information

None to report currently.

### Other Financial Industry Activities and Affiliations

Advisor is only in the business of providing investment advice. However, associated persons of Advisor are separately licensed as registered representatives through LPL. In this capacity, the associated person can sell securities to clients and receive normal and customary compensation in the form of commissions.

Associated persons are also insurance agents. In such capacity, they may offer fixed and variable life insurance products and receive normal and customary commissions as a result of any purchases made by clients.

### Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A copy of Advisor's code of ethics is available to clients or prospective clients upon request by contacting Kurt R. Rozman at (262) 798-7979 or [krozman@freedomwealthalliance.com](mailto:krozman@freedomwealthalliance.com).

Advisor and its associated persons may invest in or otherwise own an interest in the same securities that are recommended to clients within program accounts. This creates a potential conflict of interest. All associated persons are required to place the interests of clients ahead of their own when making personal investments. In addition, Advisor requires that client transactions be placed before associated person personal transactions. Personal trading by associated persons is monitored by the Advisor. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor may not deem appropriate to buy or sell for clients. Advisor does not engage in principal transactions with its clients in program accounts.

### Review of Accounts

In addition, all program accounts are subjected to a risk-based exception reporting system that flags accounts on a quarterly basis for criteria such as performance, trading activity, and concentration. The exception reporting identifies accounts where additional scrutiny or analysis by Advisor may be appropriate.

During any month that there is activity in the program account, client will receive a monthly account statement from LPL showing account activity as well as positions held in the account at month end. Additionally, client will receive a confirmation of each transaction that occurs within the program account unless the transaction is the result of a systematic purchase, redemption or exchange. Client will also receive a detailed quarterly report showing performance, positions and activity from LPL Financial.

### Other Compensation

Advisor and its associated persons may receive additional non-cash compensation from product sponsors. However, such compensation may not be tied to the sales of any products.

Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Product sponsors may also pay for education or training events that may be attended by Advisor's employees and associated persons.

### Financial Information & Custody

LPL Financial and Schwab are the qualified custodians and maintain custody of client funds and securities in a separate account for each client under the client's name. Each custodian, being qualified, sends account statements showing all transactions, positions, and all deposits and withdrawals of principal and income. These account statements are sent monthly when the account has had activity or quarterly if there has been no activity. Clients should carefully review those account statements.

Although most securities available in program accounts are in custody at either LPL Financial or Schwab, there are certain securities managed as part of the account that are held at third parties, and not at either custodian. For example, variable annuities, hedge funds and managed futures

are often held directly with the investment sponsor. For those outside positions, client will receive confirmations and statements directly from the investment sponsor. For outside positions not in custody with either custodian, said custodian may still receive information (e.g., number of shares held and market value) from the investment sponsor and display that information on statements and reports they prepare. Such information also may be used to calculate performance in performance reports prepared by LPL Financial or Schwab. Although Advisor believes that the information provided by custodians is accurate, Advisor recommends that clients refer to the statements and reports received directly from the investment sponsor and compare them with the information provided in any statements or reports from a custodian. The statements and reports provided by either custodian with respect to outside positions should not replace the statements and reports received directly from the investment sponsor.

## Brokerage Practices

In the Freedom Wealth Alliance Wrap program, Advisor requires that clients direct LPL Financial as the sole and exclusive broker-dealer to execute transactions in the account. LPL Financial is not paid a commission for executing transactions. Because associated persons of the Advisor are licensed with LPL Financial, this presents a conflict of interest. Clients should understand that not all advisors require their clients to direct brokerage. By directing brokerage to LPL Financial, clients may be unable to achieve the most favorable execution of client transactions. Therefore, directed brokerage may cost clients more money. Advisor may receive support services and/or products from LPL Financial, which assist the Advisor to better monitor and service program accounts maintained at LPL Financial. These support services and/or products may be received without cost, at a discount, and/or at another negotiated rate, and may include the following:

- investment-related research
- pricing information and market data
- software and other technology that provide access to client account data
- compliance and/or practice management-related publications
- consulting services
- attendance at conferences, meetings, and other educational and/or social events
- marketing support
- computer hardware and/or software
- other products used by Advisor in furtherance of its investment advisory business operations

Clients do not pay more for services as a result of this arrangement. There is no corresponding commitment made by the Advisor to LPL Financial or any other entity to invest any specific amount or percentage of client assets in any specific securities as a result of the arrangement. Advisor may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and the client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. Advisor may determine not to aggregate transactions, for example, based on the size of the trades, the number of client accounts, the timing of the trades, the liquidity of the

securities and the discretionary or non-discretionary nature of the trades. If Advisor does not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.



## Kurt R. Rozman

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Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Kurt R. Rozman that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Kurt R. Rozman is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Kurt R. Rozman

Year of birth: 1964

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Attended UW-Milwaukee for 3 years – no degree obtained.

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

LPL Financial, LLC - Registered Representative	5/2014 - Present
Freedom Wealth Alliance, LLC – President	5/2014 - Present
Investment Adviser Representative	5/2014 - Present
Wells Fargo Advisors Financial Network, LLC Branch Manager	5/2009 - 5/2014
Investment Adviser Representative	5/2009 - 5/2014
Wachovia Securities Financial Network, LLC Financial Advisor	6/2003 – 5/2009

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

#### Accredited Asset Management Specialist - AAMS

Designation: Accredited Asset Management Specialist (AAMS). Issuing Organization: College for Financial Planning. Prerequisites/Experience Required: None. Educational Requirements: Self-study course (12 modules requiring 100-120 hours). Continuing Education: 16 hours every 2 years.

#### Certified Fund Specialist - CFS

Designation: Certified Fund Specialist (CFS). Issuing Organization: Institute of Business & Finance. Prerequisites/Experience Required: Candidate must meet one of the following requirements: A bachelor's degree, or 1 year of financial services work experience. Educational Requirements: Candidate must complete Self Study Program (6 modules). Continuing Education: 30 hours every two years.

### Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

### Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

#### **Insurance Licensed Registered Representative:**

Your financial advisor is also a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities.

Your financial advisor also may sell insurance and may receive commissions for insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities and insurance products that he believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a product, you should ask your financial advisor.

You are under no obligation to purchase investment products or insurance through your financial advisor.

### Item 5 - Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts.

However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1

fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts that are valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services.

Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 – Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your advisor's securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R. Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.



**FREEDOM  
WEALTH  
ALLIANCE**

## Thomas S. Ramsett

Branch Office Location  
5805 Lake Road  
Oshkosh, WI 54902  
(262) 903-0027

OSJ Location  
675 North Barker Road  
Brookfield, Wisconsin  
53045  
(262) 798-7979

March 20, 2020

This brochure supplement provides information about Thomas S. Ramsett that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [krozman@freedomwealthalliance.com](mailto:krozman@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Thomas S. Ramsett is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Thomas S. Ramsett

Year of birth: 1964

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Bowling Green University

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- LPL Financial, LLC - Registered Representative 5/2014 – Present
- Freedom Wealth Alliance, LLC - Investment Adviser Representative 5/2014 – Present
- Wells Fargo Advisors Financial Network, LLC - Financial Advisor 3/2010 - 5/2014
- Wachovia Securities Financial Network, LLC - Financial Advisor 1/2008 – 3/2010

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

Accredited Asset Management Specialist - AAMS

Designation: Accredited Asset Management Specialist (AAMS). Issuing Organization: College for Financial Planning. Prerequisites/Experience Required: None. Educational Requirements: Self-study course (12 modules requiring 100-120 hours). Continuing Education: 16 hours every 2 years.

## Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised

person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

**Insurance Licensed Registered Representative:**

Your financial advisor is also a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities.

Your financial advisor also may sell insurance and may receive commissions for insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities and insurance products that he believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a product, you should ask your financial advisor.

You are under no obligation to purchase investment products or insurance through your financial advisor.

**Item 5 - Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts.

However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products.

Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay

with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services.

Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you.

Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 - Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your Advisor's securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R. Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.





## Shawn P. Hittman

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Shawn P. Hittman that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Shawn P. Hittman is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Shawn P. Hittman

Year of birth: 1977

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

University of Wisconsin, Whitewater – Bachelor of Business Administration - Finance

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- LPL Financial, LLC - Registered Representative 5/2014 – Present
- Freedom Wealth Alliance, LLC - Investment Adviser Rep. 5/2014 – Present
- Wells Fargo Advisors Financial Network, LLC - Financial Advisor 5/2009 - 5/2014
- Wachovia Securities Financial Network, LLC - Financial Advisor 6/2008 – 5/2009
- Edward Jones – Registered Representative 2/2001 – 6/2008

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

Accredited Asset Management Specialist - AAMS

Designation: Accredited Asset Management Specialist (AAMS). Issuing Organization: College for Financial Planning. Prerequisites/Experience Required: None. Educational Requirements: Self-study course (12 modules requiring 100-120 hours). Continuing Education: 16 hours every 2 years.

## Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and

describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

**Insurance Licensed Registered Representative:**

Your financial advisor is also a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities.

Your financial advisor also may sell insurance and may receive commissions for insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities and insurance products that he believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a product, you should ask your financial advisor. You are under no obligation to purchase investment products or insurance through your financial advisor.

**Item 5 - Additional Compensation**

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Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts. However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This

compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 - Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your Advisor's securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R. Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.



## Darren J. Liberski

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Darren J. Liberski that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [krozman@freedomwealthalliance.com](mailto:krozman@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Darren J. Liberski is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Darren J. Liberski

Year of birth: 1970

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Attended the University of Wisconsin-Milwaukee from 1988-1991 and the University of Phoenix from 2004 – 2006: Bachelor of Science in Business Administration

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- LPL Financial, LLC - Registered Representative 9/2014 – Present
- Freedom Wealth Alliance, LLC - Investment Adviser Representative 9/2014 – Present
- Nations Financial Group, Inc. DBA: Disciplined Financial Services, Inc.  
– Investment Adviser Representative 06/2006 - 9/2014

## Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

### Insurance Licensed Registered Representative:

Your financial advisor is also a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities.

Your financial advisor also may sell insurance and may receive commissions for

insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities and insurance products that he believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a product, you should ask your financial advisor.

You are under no obligation to purchase investment products or insurance through your financial advisor.

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

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts.

However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products.

Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or

on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 - Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your advisor's securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.



Item 1 – Cover Page



**Shannon F. Smith**

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Shannon F. Smith that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [krozman@freedomwealthalliance.com](mailto:krozman@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Shannon F. Smith is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Shannon F. Smith

Year of birth: 1969

### **Education**

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Thunderbird, American Grad School of International Management - Masters

### **Business Experience**

The following information details your Financial Advisor's business experience for at least the past 5 years.

- LPL Financial, LLC - Registered Representative 5/2014 - Present
- Freedom Wealth Alliance, LLC - Investment Adviser Representative 5/2014 – Present
- Wells Fargo Advisors Financial Network, LLC - Financial Advisor 1/2011 - 5/2014
- Morgan Stanley Smith Barney – Mass Transfer 6/2009 - 1/2011
- Morgan Stanley & Co., Incorporated 12/2005 – 6/2009

## Item 3 Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

Insurance Licensed Registered Representative:

Your financial advisor is also a broker or registered representative of LPL Financial and

may receive commissions and other types of compensation for the sale of securities. Your financial advisor also may sell insurance and may receive commissions for insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities and insurance products that she believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a product, you should ask your financial advisor.

You are under no obligation to purchase investment products or insurance through your financial advisor.

#### Item 5 Additional Compensation

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts.

However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, she is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products.

Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with her, which may be more than what she would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay her in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that she may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at

LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what she would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, she may have a financial incentive to recommend an advisory program over other programs and services. However, she may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist her with transitioning her business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on her years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with her and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage her and LPL Financial, it is because she believes that the advisory program or service is suitable for you.

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

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your Advisor's securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R. Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.



## Adrian L. Zilvetti

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Adrian L. Zilvetti that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [krozman@freedomwealthalliance.com](mailto:krozman@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Adrian L. Zilvetti is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 - Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Adrian L. Zilvetti

Year of birth: 1969

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Attended the University of Wisconsin-Madison from 1990-1993 where he majored in Economics with a concentration in Finance

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- LPL Financial, LLC - Registered Representative 9/2014 – Present
- Freedom Wealth Alliance, LLC - Investment Advisor Representative 9/2014 – Present
- Nations Financial Group, Inc. DBA: Disciplined Financial Services, Inc.  
– Investment Adviser Representative 10/2003 - 9/2014

## Item 3 - Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 - Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

### Insurance Licensed Registered Representative:

Your financial advisor is also a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities.

Your financial advisor also may sell insurance and may receive commissions for

insurance product sales. The potential for the receipt of commissions may give a broker an incentive to recommend investment or insurance products based on the compensation received, rather than on the client's needs. However, your financial advisor may only recommend securities and insurance products that he believes are suitable for you. If you have any questions regarding the compensation your financial advisor receives when recommending a product, you should ask your financial advisor.

You are under no obligation to purchase investment products or insurance through your financial advisor.

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

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts.

However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products.

Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or

on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you.

Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 - Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your advisor's securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.





## Gerald G. Schuelke

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Gerald G. Schuelke that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure that describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Gerald G. Schuelke is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Gerald G. Schuelke

Year of birth: 1949

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

Bryant & Stratton, Bachelor of Business Administration - Finance

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- LPL Financial, LLC - Registered Representative 7/2019 - Present
- Freedom Wealth Alliance, LLC - Investment Adviser Representative 7/2019 – Present
- Northwestern Mutual - Financial Advisor 6/2012 - 7/2019

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

## Item 3 Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

#### Item 4 Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

##### **Insurance Licensed Registered Representative:**

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#### Item 5 Additional Compensation

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Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or

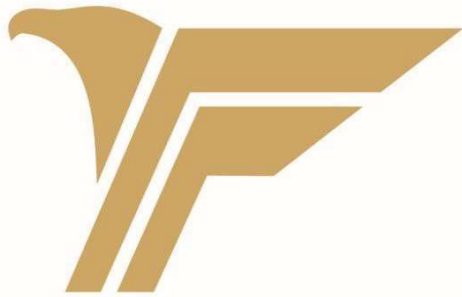
ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial 's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financials national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financials custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 - Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your Advisors' securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R. Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.

Item 1 – Cover Page



**FREEDOM  
WEALTH  
ALLIANCE**

**Eric J. Kulwicki**

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Eric J. Kulwicki that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure which describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Eric J. Kulwicki is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Eric J. Kulwicksi

Year of birth: 1977

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

University of Wisconsin – Madison, Bachelor of Arts in Business Administration (1999)

Marquette University – Master of Business Administration (2007)

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- |   |                    |
|---|--------------------|
| - Senior Portfolio Manager with Freedom Wealth Alliance | 5/2016 to Present  |
| - Senior Portfolio Analyst at Robert W. Baird & Co.     | 10/2007 to 4/2016  |
| - Mutual Fund Specialist at U.S. Bancorp Fund Services  | 11/2003 to 10/2007 |

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

Chartered Financial Analyst - CFA®

Designation: Chartered Financial Analyst (CFA®); Designation is current.

Issuing Organization: CFA Institute

## Item 3 Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered

representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

**Insurance Licensed Registered Representative:**

Your financial advisor is also by definition a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities if applicable. This financial advisor does not hold an insurance license currently.

**Item 5 Additional Compensation**

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Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financial’s parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL

Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

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

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## Charles H. Kuhtz, III

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Charles H. Kuhtz, III that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure which describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Charles H. Kuhtz, III, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Charles H. Kuhtz, III

Year of birth: 1959

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

University of Wisconsin – LaCrosse, Bachelor of Arts in Music (1982)

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- |  |                   |
|--|-------------------|
| - Financial Adviser with Freedom Wealth Alliance | 8/2016 to Present |
| - Financial Adviser with Edward D. Jones & Co.   | 3/1999 to 7/2016  |
| - Financial Adviser with Robert W. Baird & Co.   | 3/1990 to 3/1999  |

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

Certified Financial Planner - CFP®

Designation: Certified Financial Planner (CFP®); Designation is current.

Issuing Organization: CFP Board (1989)

## Item 3 Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 Other Business Activities

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operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

**Insurance Licensed Registered Representative:**

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Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts. However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors.

Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL

Financial's parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financial's national conference or top producer forums and events. LPL Financial may pay your advisor this compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

#### Item 6 - Supervision

This section explains how Freedom Wealth Alliance supervises the supervised person, including how the advice the supervised person provided to clients is monitored.

Freedom Wealth Alliance maintains a supervisory structure and system reasonably designed to prevent violations of the Investment Advisers Act of 1940. Your Advisors' securities-related activities are supervised by an individual registered as a principal in accordance with FINRA regulations. In addition, compliance staff uses tools that monitor the advisory services provided by your financial advisor, for example, with respect to asset allocation, concentration, and account activity. Kurt R. Rozman, Chief Compliance Officer - Advisory, is responsible for administering the Freedom Wealth Alliance policies and procedures for investment advisory activities and for regularly evaluating their effectiveness. Kurt R. Rozman can be reached at (262) 798-7979.



## Shawn E. Thomas

675 North Barker Road  
Brookfield, Wisconsin  
53045

(262) 798-7979

March 20, 2020

This brochure supplement provides information about Shawn E. Thomas that supplements the Freedom Wealth Alliance disclosure brochure. You should have received a copy of that brochure which describes the investment advisory services offered through Freedom Wealth Alliance, an investment advisor firm. Please contact Freedom Wealth Alliance at the telephone number above or at [info@freedomwealthalliance.com](mailto:info@freedomwealthalliance.com) if you did not receive Freedom Wealth Alliance's brochure or if you have any questions about the contents of the supplement. Additional information about Shawn E. Thomas, is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

This section of the brochure supplement includes the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years.

Shawn E. Thomas

Year of birth: 1968

### Education

The following information details your Financial Advisor's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Financial Advisor attended the institution but did not attain a degree.

University of Wisconsin – Oshkosh, Bachelor of Business Administration (1992)

### Business Experience

The following information details your Financial Advisor's business experience for at least the past 5 years.

- |  |                   |
|--|-------------------|
| - Financial Adviser with Freedom Wealth Alliance           | 2/2018 to Present |
| - Financial Adviser with FSC Securities Corp.              | 7/2017 to 7/2018  |
| - Financial Adviser with MML Investors Services, LLC       | 3/2017 to 7/2017  |
| - Financial Adviser with MSI Financial Services Inc.       | 5/2014 to 3/2017  |
| - Financial Adviser with Securian Financial Services, Inc. | 6/1992 to 5/2014  |

### Professional Designations

The following provides information on professional designation(s) that your Financial Advisor earned.

None

## Item 3 Disciplinary Information

This section includes any legal or disciplinary events and material to a client's or prospective client's evaluation of the supervised person.

There are no legal or disciplinary event(s) to disclose.

## Item 4 Other Business Activities

This section includes any relationship between the advisory business and the supervised person's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person is registered, or has an application pending to register, as a broker-dealer, registered

representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

**Insurance Licensed Registered Representative:**

Your financial advisor is also by definition a broker or registered representative of LPL Financial and may receive commissions and other types of compensation for the sale of securities if applicable. This financial advisor does not hold an insurance license currently.

**Item 5 Additional Compensation**

This section includes details regarding if someone who is not a client provides an economic benefit to the supervised person for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person’s regular salary, if any.

Your financial advisor may receive economic benefits from persons other than clients in connection with advisory services. Your financial advisor provides services in an Asset Management account and may recommend mutual funds. Only no-load and load-waived mutual funds are available to be purchased in such asset management accounts. However, some of these mutual funds may pay distribution or service fees (e.g., 12b-1 fees). For retirement accounts, such fees received are credited to your account. In non-retirement accounts, a portion of these fees may be shared with your advisor. The receipt of 12b-1 fees may present a conflict of interest because it may give an incentive to recommend mutual funds for non-retirement accounts based on the compensation received, rather than on a client's needs. However, when your financial advisor provides investment advisory services, he is a fiduciary under the Investment Advisers Act and has a duty to act in your best interest and to make full and fair disclosure to you of all material facts and conflicts of interest. Your financial advisor may receive compensation from product sponsors. Compensation may include such items as gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational or training events or marketing or advertising initiatives. Such compensation may not be tied to the sale of any products. Your financial advisor receives compensation as a result of your participation in LPL Financial advisory programs. LPL Financial shares a portion of the account fee you pay with him, which may be more than what he would receive at another investment advisor firm. This compensation may also include other types of compensation, such as bonuses, awards or other things of value offered by LPL Financial. LPL Financial may pay him in different ways, such as payments based on production, awards of stock options to purchase shares of LPL Financials’ parent company, LPL Financial Holdings Inc., reimbursement of fees that he may pay to LPL Financial for items such as administrative services, and other things of value such as free or reduced-cost marketing materials, payments in connection with the transition of association from another broker/dealer or investment advisor firm to LPL Financial, advances of advisory fees, or attendance at LPL Financials’ national conference or top producer forums and events. LPL Financial may your advisor this

compensation based on his overall business production and/or on the amount of assets serviced in LPL Financial advisory programs. Therefore, the amount of this compensation may be more than what he would receive if a client participated in other LPL Financial programs, programs of other investment advisor firms or paid separately for investment advice, brokerage and other client services. Therefore, he may have a financial incentive to recommend an advisory program over other programs and services. However, he may only recommend a program or service that he believes is suitable for you. Your financial advisor may have received a loan from LPL Financial in order to assist him with transitioning his business to LPL Financial's custodial and brokerage platforms. This loan may be forgiven by LPL Financial based on his years of service for LPL Financial and the scope of business engaged in with LPL Financial, including the amount of advisory account assets. This presents a potential conflict of interest in that your financial advisor has a financial incentive to recommend that you engage with him and LPL Financial for services in order for the loan to be forgiven. However, to the extent your financial advisor recommends you engage him and LPL Financial, it is because he believes that the advisory program or service is suitable for you.

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