

**Part 2A of Form ADV: *Disclosure Brochure***

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**This Disclosure Brochure provides information about the qualifications and business practices of Freed Investment Group, LLC (“FIG” or the “Advisor”). FIG is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). If you have any questions about the content of this brochure, please contact the Advisor at 617-424-1200 or at [kfreed@freedinvestmentgroup.com](mailto:kfreed@freedinvestmentgroup.com). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Any references to FIG being a “registered investment adviser” or “registered” do not imply a level of skill or training.**

**Additional information about FIG is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by a unique identifying number, known as a CRD number. The CRD number for the Advisor is 140679.**

## **Item 2. Summary of Material Changes**

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of FIG. For convenience, the Advisor has combined these documents into a single disclosure document.

FIG believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. FIG encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to clients.

### Future Changes

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

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the Advisor's firm name or CRD# 140679. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (617) 424-1200.

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## **Item 4. Advisory Business**

### **Introduction**

Freed Investment Group (“FIG”, “we” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a Massachusetts limited liability company with its principal place of business located in Boston, Massachusetts. FIG has been in business since 2006 and is owned and managed by Kenneth Freed (Member and Chief Compliance Officer) & Dennis Encarnation (Member and Chief Investment Officer).

FIG offers a combination of the following advisory services, where appropriate, to individuals, including high net worth individuals, trusts, estates and charitable organizations.

FIG offers and provides advisory services on a discretionary basis and, as of December 31, 2019, manages approximately \$171,238,406 in client assets. Clients may request more current information at any time by contacting the Advisor.

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

### **Investment Supervisory Services**

FIG provides continuous advice to a client regarding investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, FIG develops a client's personal investment policy and creates and manages a portfolio based on that policy. FIG will manage advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client (e.g., aggressive growth, growth, growth & income, income, or preservation of capital). The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

FIG will create a portfolio consisting of no-load and load-waived mutual funds, individual equities, exchange traded funds ("ETFs"), bonds, and other investment products where appropriate to the needs of the client.

FIG will allocate the client's assets among various investments and investment classes taking into consideration the overall management style selected by the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the

fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure.

Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances. Investment products other than mutual funds will be selected on the basis of performance history, projected future activity, and industry analysis. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

At no time will FIG accept or maintain custody of a client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

## **Item 5. Fees and Compensation**

### ***Investment Supervisory Services***

Clients' advisory fees are paid quarterly, at the end of each calendar quarter, pursuant to the terms of the advisory agreement. Advisory fees are based upon the average daily value (market value or fair market value in the absence of market value) of the client's account[s] for the calendar quarter. Advisory fees are based on the following schedule:

<b><u>Assets under Management</u></b>	<b><u>Annual Fee (%)</u></b>
First \$2,000,000	1.00%
Over \$2,000,000	0.80%

Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by FIG will be independently valued by the Custodian. FIG will not have the authority or responsibility to value portfolio securities.

Advisory fees are calculated by the Advisor or its delegate and deducted from the client's account[s] at the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the respective quarter-end date. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting advisory fees to be deducted by FIG directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

## **GENERAL INFORMATION ON FEES AND SERVICES:**

### ***Termination of Advisory Relationship***

A client agreement may be cancelled at any time, by either party, for any reason upon receipt of thirty (30) days written notice. At no cost, the client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement. After the five-day period, the client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the client.

### ***Mutual Fund Fees***

All fees paid to FIG for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and ETFs to their shareholders. These fees and expenses are described in each fund's or ETF's prospectus. These fees will generally include a management fee, other fund expenses and a possible distribution fee for mutual funds. If the mutual fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client may be able to invest in a mutual fund or ETF directly, without the services of FIG. In that case, the client would not receive the services provided by FIG which are designed, among other things, to assist the client in determining which mutual funds and/or ETFs are most appropriate to each client's financial condition and objectives; accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by FIG to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

### ***Advisory Fees in General***

Clients should note that similar advisory services may (or may not) be available from other registered investment advisers for similar or lower fees.

### ***Brokerage Expenses***

Clients may incur certain fees or charges imposed by third parties, other than FIG, in connection with investments made on behalf of the client's account[s]. The client is responsible for all securities execution and custody fees charged by the Custodian, if applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in client accounts, but typically charges for mutual funds and other types of investments. The fees charged by FIG are separate and distinct from these custody and execution fees.

## **Item 6. Performance-Based Fees and Side-By-Side Management**

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

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

## **Item 7. Types of Clients**

FIG offers a combination of the advisory services described above, where appropriate, to individuals, including high net worth individuals, trusts, and charitable organizations. The amount of each type of client is available on FIG's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. The Advisor generally required a minimum relationship size of \$350,000 for its services. This minimum may be reduced or waived at the sole discretion of the Advisor.

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

The Advisor generally employs fundamental and technical analysis methods to formulate client recommendations. Fundamental analysis of a business involves analyzing its income statement, financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis school of thought maintains that markets may misprice a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mispriced security and then waiting for the market to recognize its "mistake" and re-price the security. However, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

Technical analysis seeks to identify price patterns and trends in financial markets and attempt to exploit those patterns. We follow and examine such indicators as price, volume, moving averages of the price, and market sentiment. Since technical analysis predictions are only extrapolations from historical price patterns, investors bear risk that these patterns will not reoccur as expected.

Quantitative Analysis: We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of a share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis: We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily

subject to measurement, and predict changes to share price based on that data. A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Asset Allocation: Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Mutual Fund and/or ETF Analysis: We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in other funds in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to continue or replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the fund or ETF less appropriate for the client's portfolio.

Risks for all forms of analysis: Our securities analysis methods rely on the assumption that the companies whose securities we recommend, purchase, and sell, the rating agencies that review these securities, and other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are aware that indications, reporting, or data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

***Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.***

## **Item 9. Disciplinary Information**

FIG is obligated to disclose whether or not its employees or owners have been involved in any legal, financial, or disciplinary events material to its advisory business. At this time, FIG does not have any events to report. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at



[www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching the Advisor's firm name or CRD# 140679.

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

FIG has entered into administrative services agreements with Kenneth Freed & Co., PC ("KF&C"), an unaffiliated accounting firm and certain employees of KF&C, separately, to provide administrative support including but not limited to authorized transfers and payments, trading, investment advice and recommendations. KF&C may recommend FIG to accounting clients in need of advisory services. Likewise, FIG may recommend KF&C to advisory clients in need of accounting services. There are no referral fee arrangements between FIG and KF&C for these recommendations. No FIG client is obligated to use KF&C for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by FIG. KF&C's accounting services do not include the authority to sign checks or otherwise disburse funds on any FIG advisory client's behalf.

Clients should be aware that outside affiliations and the receipt of additional compensation by the Advisor and management persons or employees create a conflict of interest that can impair the objectivity of the Advisor and these individuals when making advisory recommendations. FIG endeavors at all times to put the interests of clients first as part of the Advisor's fiduciary duty as a registered investment adviser and take the following steps to address potential conflicts:

1. We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and its employees to earn compensation from advisory clients in addition to our advisory fees;
2. We disclose to clients that they are not obligated to purchase recommended investment products from our employees;
3. We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
4. Our management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
5. We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
6. We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
7. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

## **Item 11. Code of Ethics and Personal Trading**

FIG has adopted a Code of Ethics expressing the Advisor's commitment to ethical conduct. FIG's Code of Ethics describes the Advisor's fiduciary duties and responsibilities to clients,

and sets forth FIG's practice of supervising the personal securities transactions of supervised persons with access to client investment information.

To supervise compliance with its Code of Ethics, FIG requires that anyone associated with this advisory practice with access to advisory recommendations provide initial and annual securities holdings reports and quarterly transaction reports to the Chief Compliance Officer or another designated officer. FIG requires such access persons to also receive approval from Chief Compliance Officer or another designated officer prior to investing in any initial public offerings ("IPOs") or private placements (limited offerings).

The Advisor's Code of Ethics requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. FIG's Code of Ethics further includes the Advisor's Insider Trading Policy prohibiting the use or misuse of material non-public information. Any individual not in observance of the above may be subject to discipline.

FIG will provide a copy of its Code of Ethics to any client upon request to FIG's Chief Compliance Officer at FIG's principal address.

The Advisor and the individuals associated with FIG may buy or sell securities identical to those recommended to clients for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of the Advisor that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account and, therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

As these situations represent a conflict of interest, the Advisor has established the following additional restrictions in order to ensure its fiduciary responsibilities:

1. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No principal or employee of our firm may prefer his or her own interest to that of the advisory client.
2. We maintain records of all securities holdings for our firm and anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by Chief Compliance Officer or designated officer.
3. All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Any individual not in observance of the above may be subject to termination.

## Item 12. Brokerage Practices

FIG does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard client assets and authorize FIG to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, FIG does not have the discretionary authority to negotiate commissions on behalf of clients on a trade-by-trade basis.

Where FIG does not exercise discretion over the selection of the Custodian, it will recommend the Custodian to clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by FIG. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. FIG may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the client, services made available to the client, and its reputation, and/or the location of the Custodian's offices.

FIG will generally recommend that clients establish their account[s] with Fidelity Clearing & Custody Solutions, a related entity of Fidelity Investments, Inc. (collectively "Fidelity"), a FINRA-registered broker-dealer and member SIPC. Fidelity will serve as the client's "qualified custodian". FIG maintains an institutional relationship with Fidelity, whereby the Advisor receives economic benefits from Fidelity. Please see Item 14 below.

The following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **FIG does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor receives certain economic benefits from the Custodian. Please see Item 14 below.**

**2. Brokerage Referrals** - FIG does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** - All clients are serviced on a "directed brokerage basis", where FIG will place trades within the established account[s] at the Custodian designated by the client. Further, all client accounts are traded within their respective account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client's account[s]). FIG will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### ***Aggregation of Transactions***

FIG will generally not aggregate client transactions as FIG typically handles investment transactions on a personalized and client-by-client basis. If FIG does aggregate client transactions, it permits the trading of aggregate blocks of securities composed of assets from multiple clients' accounts so long as transaction costs are shared equally and on a pro-rated basis between all accounts included in any such block trade. Block trading may allow FIG to execute trades in a more timely, equitable, and efficient manner and to seek to reduce overall commission charges to clients. No personal trades will be included with any client transactions.

## **Item 13. Review of Accounts**

### ***Reviews of Accounts***

While the underlying securities within Investment Supervisory Services accounts are continuously monitored, these accounts are reviewed on a more formal basis at least quarterly.

Accounts are reviewed in the context of each client's stated investment objectives and guidelines. Changes in variables such as market, political, or economic circumstances, changes in a client's individual financial objectives or circumstances, or a client's request may trigger more frequent reviews.

In addition to the monthly statements and confirmations of transactions that Investment Supervisory Services clients receive from their broker-dealer, bank, custodian, or mutual fund company, FIG will provide quarterly reports summarizing account performance, balances, and holdings.

## **Item 14. Other Compensation**

### ***Compensation Received by FIG***

FIG is a fee-based advisory firm that is compensated solely by its clients and not from any investment product. FIG does not receive commissions or other compensation from product sponsors, broker-dealers, or any unrelated third party. FIG may refer clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its clients. Likewise, FIG may receive non-compensated referrals of new clients from various third-parties.

FIG has established an institutional relationship with Fidelity ("Custodian") to assist the Advisor in managing Client account[s]. Access to the FIG platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to clients that maintain assets at FIG. The software and related systems support may benefit the Advisor, but not its clients directly. In fulfilling its duties to its clients, the Advisor endeavors, at all times, to put the

interests of its clients first. However, clients should be aware that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

### ***Client Referrals from Solicitors***

FIG does not engage paid solicitors for client referrals.

## **Item 15. Custody**

FIG does not accept or maintain custody of any client accounts, except for the authorized deduction of the Advisor's fees. All clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct FIG to utilize that Custodian for the client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by FIG to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

In addition, if the client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the client's instructions.

## **Item 16. Investment Discretion**

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

## **Item 17. Voting Client Securities**

### ***Proxy Voting***

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

### ***Legal Proceedings***

Further, we may also assist clients with appropriate research or appropriate information to assist client with any filings for legal proceedings, e.g., class actions, reorganizations, bankruptcies, etc., relating to any portfolio securities.

### **Item 18. Financial Information**

Neither FIG, nor its management, has any adverse financial situations that would reasonably impair the ability of FIG to meet all obligations to its clients. Neither FIG, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. FIG is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.

## Part 2B of Form ADV: Brochure Supplement

Kenneth Freed  
Member and Chief Compliance Officer

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March 16, 2020

**This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Kenneth Freed (CRD# 4391700) in addition to the information contained in the Freed Investment Group (“FIG” or the “Advisor”, CRD# 140679) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the FIG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (617) 424-1200.**

**Additional information about Mr. Freed is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 4391700.**

## Item 2. Educational Background and Business Experience

Kenneth Freed, Member

Year of Birth: 1955

### Education:

Kenneth Freed graduated from the University of Massachusetts in 1976 with a Bachelor of Science. He also graduated from Bentley College in 1987 with a Masters of Science in Taxation. In addition, he received his Personal Financial Specialist (PFS)<sup>1</sup> designation in 1999 granted by the American Institute of Certified Public Accountants.

### Employment History:

Member of Freed Investment Group, LLC, 04/2006 to present.

Member of Freed Fiesta, LLC, 04/2000 to 12/2006.

Owner of Kenneth Freed & Co., CPAs 08/1979 to 12/2015.

Employee of Kenneth Freed & Co., PC 01/2016 to 06/2018.

## Item 3. Disciplinary Information

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

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

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<sup>1</sup> **Personal Financial Specialist (PFS)**

The PFS designation is awarded by the American Institute of Certified Public Accountants (AICPA) to those who have taken additional training and already have a CFP® designation. Every PFS credential holder is a licensed CPA and a member in good standing in the AICPA; has met strict education and eligible business experience requirements, including two (2) years of full-time business or teaching experience in personal financial planning and has agreed to the AICPA Code of Professional Conduct.



However, the Advisor does encourage you to independently view the background of Mr. Freed on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his full name or his Individual CRD# 4391700.

**Item 4. Other Business Activities**

Mr. Freed is dedicated to the investment advisory activities of FIG's Clients. Mr. Freed does not have any other business activities.

**Item 5. Additional Compensation**

Kenneth Freed may refer FIG clients, or others, to BNY Mellon Wealth Management ("Mellon") for advisory services when appropriate for the particular financial and investment needs of a client. For any referral services, Mellon will compensate Kenneth Freed individually with a referral fee, typically a percentage ranging from ten to twenty percent (10 to 20%) of the advisory fees Mellon receives from clients referred by Kenneth Freed. FIG's client advisory fees are not increased in any way as a result of Kenneth Freed's referrals to Mellon. Clients are under no obligation to implement any recommendations made by Mr. Freed or Mellon.

**Item 6. Supervision**

Kenneth Freed and Dennis Encarnation are responsible for all supervision, formulation, and monitoring of investment advice offered to clients. Kenneth Freed and Dennis Encarnation review and oversee all material investment policy changes and conducts periodic testing to ensure that client objectives and mandates are being met.

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

## Part 2B of Form ADV: Brochure Supplement

John M. Stanton

Freed Investment Group, LLC  
136 Marlborough Street  
Suite 3  
Boston, MA 02116  
617-424-1200

March 16, 2020

**This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of John M. Stanton (CRD# 5082566) in addition to the information contained in the Freed Investment Group (“FIG” or the “Advisor”, CRD# 140679) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the FIG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (617) 424-1200.**

**Additional information about Mr. Stanton is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5082566.**

## **Item 2.Educational Background and Business Experience**

John M. Stanton, Investment Adviser Representative

Year of Birth: 1961

### Education:

Mr. Stanton graduated Bentley College in 1983 with a Bachelor of Science in Accountancy. He also graduated from Bentley College in 1990 with a Masters of Science in Taxation. In addition, he earned his Certified Public Accountant (CPA) certification<sup>2</sup> in 1987.

### Employment History:

Investment Adviser Representative of Freed Investment Group, LLC, 02/2011 to present.  
Administrative / Clerical Support of Freed Investment Group, LLC 09/2006 to present.

Employee Certified Public Account of Kenneth Freed & Co., CPAs, 09/2006 to 12/2015.

Co-Owner of Kenneth Freed & Co., PC 01/2016 to present.

Investment Adviser Representative of Lincoln Financial Advisors Corp., 01/2006 to 10/2008.

Owner & Certified Public Accountant of Stanton & Company, 01/2000 to 09/2006.

Vice President –Finance of Mount Vernon Group, Inc., 11/2000 to 08/2006.

Employee of Cary, Johnson & O'Connor, P.C., CPA's, 11/1998 to 11/2000.

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### <sup>2</sup> **Certified Public Accountant (CPA)**

In order to become a CPA in the United States, the candidate must sit for and pass the Uniform Certified Public Accountant Examination, which is set by the American Institute of Certified Public Accountants and administered by the National Association of State Boards of Accountancy.

Eligibility to sit for the Uniform CPA Exam is determined by individual State Boards of Accountancy. Typically the requirement is a U.S. bachelor's degree which includes a minimum number of qualifying credit hours in accounting and business administration with an additional 1 year study. All CPA candidates must pass the Uniform CPA Examination to qualify for a CPA certificate and license (i.e., permit to practice) to practice public accounting.

CPAs are required to take continuing education courses in order to renew their license. Requirements vary by state. The vast majority of states require 120 hours of CPE every 3 years with a minimum of 20 hours per calendar year. The requirement can be fulfilled through attending live seminars, webcast seminars, or through self-study (textbooks, videos, online courses, all of which require a test to receive credit). As part of the CPE requirement, most states require their CPAs to take an ethics course during every renewal period. Ethics requirements vary by state, and the courses range from 2–8 hours.

### **Item 3. Disciplinary Information**

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

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

However, the Advisor does encourage you to independently view the background of Mr. Stanton on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his full name or his Individual CRD# 5082566.

### **Item 4. Other Business Activities**

Mr. Stanton is also an owner of Kenneth Freed & Co., PC. He spends up to 95% of his time on this other business activity.

Mr. Stanton is also a small minority owner of Stanton & Co., a CPA accounting firm based in Woburn, MA.

### **Item 5. Additional Compensation**

Mr. Stanton devotes substantially all his time and efforts to the accounting business of Kenneth Freed & Co, PC as disclosed above. This affiliation is his only outside financial affiliation and he receives additional and separate compensation from the accounting firm for his services there.

### **Item 6. Supervision**

Kenneth Freed and Dennis Encarnation are responsible for all supervision, formulation, and monitoring of investment advice offered to clients. Kenneth Freed and Dennis Encarnation review and oversee all material investment policy changes and conducts periodic testing to ensure that client objectives and mandates are being met.

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

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

Part 2B of Form ADV: *Brochure Supplement*

Dennis J. Encarnation  
Member and Chief Investment Officer

Freed Investment Group, LLC  
136 Marlborough Street  
Suite 3  
Boston, MA 02116  
617-424-1200

March 16, 2020

**This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Dennis J. Encarnation (CRD# 6448218) in addition to the information contained in the Freed Investment Group (“FIG” or the “Advisor”, CRD# 140679) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the FIG Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (617) 424-1200**

**Additional information about Dr. Encarnation is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6448218.**

## **Item 2. Educational Background and Business Experience**

Dennis J. Encarnation, Member

Year of Birth: 1952

### Education:

Dennis Encarnation graduated with a Bachelor of Arts degree from the College of Charleston in 1974, specializing in international relations. He also graduated from Duke University in 1980 with MA and Ph.D. degrees, specializing in economic policy and corporate strategy. He was a post-doctoral fellow at Stanford University from 1980-82, specializing in corporate strategy. In addition, he received a certificate from the Executive Program for Management Development (a 'mini-MBA' program) from the Harvard Business School in 1982.

### Employment History:

Member of Freed Investment Group, LLC, 01/2016 to present.

Dennis Encarnation joined Freed Investment Group as a consultant, focusing on client communications, in 2008. In 2015 he became an Investment Adviser Representative working on investment strategies, client services, communications and meetings, trading, and client reporting. Previously, Dennis Encarnation taught at Harvard University from 1982 to his retirement in June, 2009. From 1982-1994 he was an Assistant Professor and then Associate Professor at the Harvard Business School. Subsequently, from 1994-2009, he was a Senior Lecturer and Program Director at the Harvard Kennedy School.

Prior to Harvard, Mr. Encarnation also taught at Stanford University, Davidson College, and the University of North Carolina.

During these years, he also consulted for a wide variety of business enterprises, government agencies, and multilateral organizations.

## **Item 3. Disciplinary Information**

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

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



However, the Advisor does encourage you to independently view the background of Mr. Encarnation on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching his full name or his Individual CRD# 6448218.

#### **Item 4. Other Business Activities**

Dennis Encarnation also conducts business through two other companies in which he holds a sizeable ownership interest. Neither company is engaged in securities-related transactions. Moreover, there is no business relationship between either of these two businesses and Freed Investment Group, LLC (“FIG”).

First, he is the sole owner of Dennis J. Encarnation & Associates, LLC (hereinafter, “DJE”), where he provides consulting services regarding the formulation and execution of corporate strategy and public policy. Dennis Encarnation spends approximately 20% of his time with DJE.

Second, Dennis Encarnation is also a co-owner of Wise Labs, Inc. (hereinafter, “WL”), which engages in technology consulting and commercialization. He spends approximately 10% of his time with WL.

#### **Item 5. Additional Compensation**

Dennis Encarnation receives separate and typical compensation from DJE and from WL. Together, these two businesses account for up to 60% of his time on other business activities.

#### **Item 6. Supervision**

Kenneth Freed and Dennis Encarnation are responsible for all supervision, formulation, and monitoring of investment advice offered to clients. Kenneth Freed and Dennis Encarnation review and oversee all material investment policy changes and conducts periodic testing to ensure that client objectives and mandates are being met.

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

## Privacy Policy

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Effective: March 16, 2020

### Our Commitment to You

Freed Investment Group (“FIG” or the “Advisor”) is committed to safeguarding the use of personal information of our clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”).

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

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

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

### Why you need to know?

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

### What information do we collect from you?

Driver’s license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

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

### How do we protect your information?

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

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

### How do we share your information?

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

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

## State-specific Regulations

Massachusetts	In response to a Massachusetts law, clients must “opt-in” to share non-public personal information with non-affiliated third parties before any personal information is disclosed. Client opt-in is obtained through the client’s execution of authorization forms provided by the third parties, by executing an Information Sharing Authorization Form, or by other written consent by the client, as appropriate and consistent with applicable laws and regulations.
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## Changes to our Privacy Policy

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

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

## Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (617) 424-1200.