

Cover Page - Item 1

***Freedom Family Office, LLC***

**Form ADV Part 2A Brochure**

166 East 61<sup>st</sup> Street, Suite 6B  
New York, NY 10065

Phone: (917) 697-4156  
[peter@freedomfamilyoffice.com](mailto:peter@freedomfamilyoffice.com)  
[www.freedomfamilyoffice.com](http://www.freedomfamilyoffice.com)

**March 24, 2022**

Freedom Family Office, LLC is a registered investment adviser. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or promulgates analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Freedom Family Office, LLC. If you have any questions about the contents of this brochure, please contact us at (917) 697-4156. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Freedom Family Office, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The firm's CRD/IARD number is 310275.

## Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this disclosure brochure. We will review and update, as needed, our brochure at least annually to make sure that it remains current.

On March 24, 2022, we submitted our annual updating amendment filing for fiscal year 2021. We have updated Item 4 of our Form ADV Part 2A Brochure to disclose discretionary assets under management of approximately \$110,722,483, and non-discretionary assets under management of approximately \$0.

If you would like to receive a complete copy of our current brochure free of charge at any time, please contact us at (917) 697-4156 or at [peter@freedomfamilyoffice.com](mailto:peter@freedomfamilyoffice.com).

**Table of Contents - Item 3**

**Contents**

Cover Page - Item 1 .....	0
Material Changes - Item 2 .....	1
Table of Contents - Item 3 .....	2
Advisory Business - Item 4 .....	3
Fees and Compensation - Item 5 .....	6
Performance-Based Fees and Side-By-Side Management - Item 6 .....	8
Types of Clients - Item 7 .....	9
Methods of Analysis, Investment Strategies and Risk of Loss - Item 8 .....	9
Disciplinary Information - Item 9 .....	13
Other Financial Industry Activities or Affiliations - Item 10 .....	13
Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11 .....	14
Brokerage Practices - Item 12 .....	15
Review of Accounts - Item 13 .....	17
Client Referrals and Other Compensation - Item 14 .....	17
Custody - Item 15 .....	17
Investment Discretion - Item 16 .....	18
Voting Client Securities - Item 17 .....	18
Financial Information - Item 18 .....	18
Requirements of State-Registered Advisers - Item 19 .....	18
Freedom Family Office, LLC Privacy Notice .....	19

#### **Advisory Business - Item 4**

Freedom Family Office, LLC (hereinafter “FFO”) is a registered investment advisor based in New York, NY. We are a limited liability company, organized under the laws of the State of Florida. We have been providing investment advisory services since 2020. IWM Advisors, LLC and The Freedom Legacy Trust are the principal owners of FFO.

You may see the term Associated Person throughout this Brochure. As used in this Brochure, this term refers to anyone from our firm who is an officer, an employee, and all individuals providing investment advice on behalf of our firm. Where required, such persons are properly registered as investment adviser representatives.

Currently, we offer the following investment advisory services, personalized for each individual client:

- **Family Office Services**
- **Portfolio Management Services**
- **Selection of Third Party Investment Advisers**

#### **Family Office Services**

FFO provides family office services that are designed to help families coordinate their multiple forms of capital using a holistic and collaborative team approach combining the many elements inherent to a successful life with wealth. Our collective experiences support our belief that a dedicated team of independent and objective professionals working in collaboration with each other in partnership with the family is the best way to serve families of significant wealth. Such a relationship enhances FFO’s ability to advise families on the opportunities and risks that their wealth presents, allowing families to make better, educated decisions.

Initially, FFO meets with the prospective client to obtain information about their overall situation. This information is used to assist FFO in understanding a client’s needs and the scope of services that are most appropriate for the client’s situation. The family office services FFO will provide will be specifically described in the Family Office Services Agreement you enter into with our firm. Additional services beyond the scope of the Family Office Services Agreement may be provided under separate agreement(s) and may include a separate fee as mutually agreed to by FFO and the client.

Our family office services vary by family and occasionally within families, but may include the following:

- **Portfolio Management Services** – Includes development of asset allocation, ongoing portfolio management, and review, including selection and evaluation of investment managers. Further, we may provide customized performance reporting at the portfolio level and at the manager or specific investment level. Additional information about our portfolio management services is provided in the portfolio management services section below.
- **Information Management and Coordination** – We organize key information and the coordinate such information with the family, the family’s accountant, attorney, insurance agents, and other key advisors.
- **Estate, Gift & Trust Planning** – We provide explanations, summaries, and illustrations of existing and proposed estate planning documents and strategies, including recommendations and education on additional strategies, considerations for making updates periodically and further coordination with family’s tax and legal advisor(s) to implement agreed upon strategies or updates.
- **Income Tax Planning** – Includes planning for the minimization of tax liabilities, including asset location, tax loss harvesting and gain minimization planning, charitable asset selection, facilitation of income tax payments and coordination with family’s tax advisor(s).
- **Financial Planning** – Includes planning related to cash flow analysis, capital sufficiency modeling, lifestyle goals, credit usage, major asset purchases or liquidations, and significant life events.

- **Philanthropic Planning** – Includes defining philanthropic goals, education on philanthropic vehicles and strategies for maximizing the benefits of philanthropy across the family and the organizations they choose to benefit.
- **Education** – Includes both individual and group-based learning sessions around various planning, tax, investment and other topics with an intention of growing not only the family's financial capital, but non-financial capital as well. These topics while commonly focused on younger generations are generally available across all generations.
- **Family Meetings** – Includes facilitation of family meetings often across multiple generations around shared ownership, philanthropy, decision making or shared goals and objectives.
- **Assistance with Trust Administration** – Includes advice around trustee selection and ongoing guidance, general understanding of trust purposes and provisions. Often, this involves education for grantors, trustees, and beneficiaries on their respective roles and responsibilities.
- **Consolidated Reporting Services** – Allows the family to customize how their assets are reported by offering a view across multiple accounts or entities in a single statement and/or to segregate assets within accounts. This service may include assets not generally managed by FFO such as closely-held private family assets. This enables the family and their advisors to understand and monitor the total family balance sheet and provide comprehensive and integrated advice from a vantage point inclusive of the family's entire wealth landscape. This may require an additional fee depending on the nature and complexity of the non-managed assets being reported on. Any additional fees will be mutually agreed to in advance.
- **Asset Protection Planning and Review** – Includes review and discussion of strategies that may avoid or minimize a portion of a family's balance sheet at risk. These strategies will be evaluated on the benefits they may provide against the degree and likelihood of loss and the complexity and administration they may require to achieve such protections.
- **Liability Risk Management Planning and Review** – Includes advice on a combination of mitigation strategies including the use of special purpose entities, trusts and/or various insurance tools. We will review the family's assets and liabilities to determine: location, titling and ownership structure. We will review existing or proposed policies and, after receiving your permission, we may facilitate reviews with unaffiliated third-party professionals.
- **Estate Tax Liquidity Planning and Review** – Includes determination of estate tax liquidity needs and determination of potential liquidity sources including asset liquidations and life insurance. We will review existing or proposed policies and, after receiving your permission, we may facilitate reviews with unaffiliated third-party professionals.

The advice we propose is designed to achieve the client's desired goals which may require revision to meet changing circumstances. Our recommendations are based on your situation from the information provided to the firm. Families may choose to accept or reject our recommendations. We should be notified promptly of any change to your situation, goals, objectives, or needs.

#### **Portfolio Management Services**

Our firm offers discretionary portfolio management services to our clients. Discretionary portfolio management means we will make investment decisions and place buy or sell orders in your account without contacting you. These decisions would be made based upon your stated investment objectives, which will be documented in a written Investment Policy Statement. If you wish, you may limit our discretionary authority by, for example, setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing.

Our investment advice is tailored to meet our clients' needs and investment objectives. If you decide to hire our firm to manage your portfolio, we will meet with you to gather your financial information, determine your goals, and help you decide how to allocate your investments. The information we gather will help us implement an asset allocation strategy that will be specific to your goals, whether we are actively investing for you or simply providing you with advice.

FFO does not specialize in specific types of securities. We can advise clients on various types of securities, such as exchange listed equities, over the counter equities, foreign issues, American depository receipts, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (including mutual funds and exchange traded funds), US Government securities, options contracts on securities and/or commodities, private equity instruments, and interests in partnership investing in real estate. Additionally, will provide advice on existing investments you may hold at the inception of the advisory relationship or on other types of investments for which you ask advice.

If you engage us for portfolio management services, we will monitor your portfolio's performance on a continuous basis, and rebalance the portfolio whenever necessary, as changes occur in market conditions and/or your financial circumstances, as guided by your Investment Policy Statement.

#### *Recommendation of Sub Advisors*

As part of our overall portfolio management strategy, we may recommend sub advisers to manage all or a portion of your account. All sub advisers recommended by our firm must either be registered as investment advisers or exempt from registration requirements. These sub advisers may specialize in traditional or alternative investments. Factors that we take into consideration when making our recommendations include, but are not limited to, the following: the sub adviser's performance, methods of analysis, fees, your financial needs, investment goals, risk tolerance, and investment objectives. Once a sub advisory account has been established, we will provide all administrative and clerical duties that are required to service your account. The sub adviser will have little or no direct contact with you. Our responsibility to you will be to: (i) continuously evaluate the performance of your portfolio to ensure the sub adviser selected adheres to your asset allocation guidelines; (ii) make recommendations regarding the sub adviser as market factors and your personal goals dictate, (iii) assume discretionary authority to hire or fire the sub adviser where such action is deemed to be in your best interest.

#### **Selection of Third Party Investment Advisers**

FFO has entered into agreements with various third party investment advisers for the provision of certain investment advisory services. Factors considered in the selection of a third party advisor include but may not be limited to: i) FFO's preference for a particular third party advisor; ii) the client's risk tolerance, goals and objectives, as well as investment experience; and, iii) the amount of client assets available for investment. In order to assist clients in the selection of a third party advisor, an Associated Person of FFO will typically gather information from the client about the client's financial situation, investment objectives, and reasonable restrictions the client wants imposed on the management of the account.

The third party advisor may customize the client's portfolio by blending traditional investment strategies with an allocation to asset classes. The investment strategy adopted by the third party advisor may embrace value, growth, or contrarian investing styles. Generally, securities transactions will be decided upon and executed by the third party advisor on a discretionary basis. This means that the manager selected will have the ability to buy and sell securities in your account without obtaining your approval. FFO and its Associated Persons will not manage, or obtain discretionary authority over the assets in accounts participating in these programs; however, clients may grant FFO the discretionary authority to hire and fire such third party managers. Generally, clients may not impose restrictions on investing in certain securities or types of securities in accounts managed by a third party advisor.

Associated Persons of FFO will periodically review reports provided to the client. An Associated Person of FFO will contact the client at least annually, or more often as agreed upon with each client, to review the client's financial situation and objectives, communicate information to the third party advisor managing the account as necessary, and to assist the client in understanding and evaluating the services provided by the third party advisor. Clients will be expected to notify FFO of any changes in their financial situation, investment objectives, or account restrictions.

The third party advisor may offer wrapped or non-wrapped pricing options. Wrap pricing structures allow the client to pay an all-inclusive fee for management, brokerage, clearance, custody, and administrative services. In a non-wrap pricing structure, the third party advisor's fee may be separated from the advisory fee charged by FFO. Transaction costs may also be charged for the execution and clearance of advisory transactions directed by such Third Party Advisory Services. A complete description of the programs and services provided, the amount of total fees, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the third party advisor's Form ADV Part 2A; ii) the program wrap brochure (if applicable) or other applicable disclosure documents; iii) the disclosure documents of the portfolio manager(s) selected; or, iv) the third party advisor's account opening documents. A copy of all relevant disclosure documents of the third party advisor and of the individual portfolio manager(s) will be provided to anyone interested in these programs/managers.

#### **Wrap Fee Programs**

We do not sponsor, manage, or participate in any wrap fee programs.

#### **Assets Under Management**

As of February 17, 2022, we manage approximately \$110,722,483 in client assets on a discretionary basis and approximately \$0 in client assets on a non-discretionary basis.

**Important Note: Information related to legal matters that is provided as part of our services is for informative purposes only. Clients are instructed to contact their legal advisers for personalized advice.**

### **Fees and Compensation - Item 5**

#### **Family Office Services Fees**

For family office services, FFO charges an agreed upon annual fixed fee that starts at \$10,000. The fee will increase based on the complexity of the client's financial situation and needs. Family office service fees are negotiated with each family office and can vary greatly based on the needs of each family. Prior to engaging FFO to provide family office services, clients will be required to enter into a written agreement with our firm. This agreement will set forth the terms and conditions of the engagement and will describe the scope of the services to be provided. Fees are payable as invoiced and in accordance with a payment arrangement that is clearly set forth in the agreement signed by the client and the firm. Services beyond the scope of the family office services agreement will be billed at a rate of \$500/hour.

Either party may terminate the family office services agreement by written notice to the other. All prepaid, unearned fees will be promptly refunded to the client.

#### **Portfolio Management Services Fees**

FFO charges an annual fee of up to 1.50% of the market value of the assets under management for portfolio management services. These fees are based on factors such as the amount of assets, range of investments, and complexity of the client's financial circumstances, among others. Since this fee is agreed upon with each client, the exact fee paid by the client will be clearly stated in the advisory agreement signed by FFO and the client.

Investment management fees are payable monthly, in arrears, based on the total value of assets on the last day of the month. Fees are adjusted for deposits or withdrawals in excess of \$100,000. Generally, the custodian holding the client's account will deduct FFO's fees and any other custodial fees directly from a designated account to facilitate billing provided the client has given written authorization. The qualified custodian will send an account statement at least quarterly. This statement will detail all account activity. In limited circumstances, at the sole discretion of FFO, we may agree to invoice you directly for our advisory fee or we may negotiate other fee payment arrangements.

At the inception of services, the first pay period's fees will be calculated on a pro-rata basis. The wealth agreement between the client and FFO will continue in effect until either party terminates the agreement in accordance with the terms of the agreement. FFO's annual fee will be pro-rated through the date of termination. Refunds are not applicable because fees are payable in arrears.

### **Third Party Adviser (TPAs) Fees**

FFO will perform management searches of various independent registered investment advisers for referral to FFO clients. FFO will share in the fee paid to the TPA. The management fee is disclosed in the TPA's disclosure documents. These fees may or may not be negotiable. FFO's compensation may differ depending upon the firm's individual agreement with each TPA. FFO or its Associated Persons may have an incentive to recommend one TPA over another TPA with whom it has less favorable compensation arrangements or other advisory programs offered by TPAs with which it has no compensation arrangements. In order to address this conflict, the firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients when taking investment action and to uphold their fiduciary duty and to put the client's interest first. Clients are not required to use the services of any TPA we recommend.

### **Important Notes Regarding Billing**

***Billing on Cash Positions:*** The firm treats cash and cash equivalents as an asset class. Accordingly, unless otherwise agreed in writing, all cash and cash equivalent positions (e.g., money market funds, etc.) are included as part of assets under management for purposes of calculating the firm's advisory fee. At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), the firm may maintain cash and/or cash equivalent positions for defensive, liquidity, or other purposes. While assets are maintained in cash or cash equivalents, such amounts could miss market advances and, depending upon current yields, at any point in time, the firm's advisory fee could exceed the interest paid by the client's cash or cash equivalent positions.

***Billing on Margin:*** Unless otherwise agreed in writing, the gross amount of assets in the client's account, including margin balances, are included as part of assets under management for purposes of calculating the firm's advisory fee. Clients should note that this practice will increase total assets under management used to calculate advisory fees which will in turn increase the amount of fees collected by our firm. This practice creates a conflict of interest in that our firm has an incentive to use margin in order to increase the amount of billable assets. At all times, the firm and its Associated Persons strive to uphold their fiduciary duty of fair dealing with clients. Clients are free to restrict the use of margin by our firm. However, clients should note that any restriction on the use of margin may negatively impact an account's performance in a rising market.

***Periods of Portfolio Inactivity:*** The firm has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, the firm will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including but not limited to investment performance, fund manager tenure, style drift, account additions/withdrawals, the client's financial circumstances, and changes in the client's investment objectives. Based upon these and other factors, there may be extended periods of time when the firm determines that changes to a client's portfolio are neither necessary nor prudent. Notwithstanding, unless otherwise agreed in writing, the firm's annual investment advisory fee will continue to apply during these periods, and there can be no assurance that investment decisions made by the firm will be profitable or equal any specific performance level(s).

### **Additional Fees and Expenses**

Our fee is exclusive of, and in addition to, brokerage commissions, transaction fees, and other related costs and expenses. You are responsible for brokerage costs incurred. However, FFO will not receive any portion of the commissions, fees, and costs. Please see Item 12 – Brokerage Practices for further information on brokerage arrangements and transaction costs.



Fees are negotiable based on the amount of assets under management, complexity of client goals and objectives, and level of services rendered. As described above, the fees are charged as described and are not based on a share of capital gains of the funds of any advisory client.

*Negotiability of Fees:* We allow Associated Persons servicing the account to negotiate the exact investment management fees within the range disclosed in our Form ADV Part 2A Brochure. As a result, the Associated Person servicing your account may charge more or less for the same service than another Associated Person of our firm. Further, our annual investment management fee may be higher than that charged by other investment advisors offering similar services/programs.

All fees paid to FFO for investment advisory services are separate and distinct from the fees and expenses charged to shareholders by mutual funds or exchange traded funds. These fees and expenses are described in each fund's prospectus. These fees generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, you may pay an initial or deferred sales charge.

A client could invest in a mutual fund directly, without the services of FFO. In this case, the client would not receive the services provided by FFO, which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to their financial condition and objectives. Accordingly, clients should review the fees charged by the funds and the fees charged by FFO to fully understand the total amount of fees charged and to evaluate the cost of advisory services being provided.

We do not represent, warrant, or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

#### **Compensation for the Sale of Insurance Products**

Certain Executive officers and other Associated Persons of FFO are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to clients of FFO. Insurance commissions earned by these persons are separate and in addition to FFO's advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. **Clients of our firm are under no obligation, contractually or otherwise, to purchase insurance products through any person or entity affiliated with our firm.**

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

Performance-based fees are based on a share of capital gains on or capital appreciation of the client's assets. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account(s).

Clients should note that some of the pooled investment vehicles that our related persons advise or manage will charge a performance based fee. These fees will be detailed in the private placement memorandum provided to each investor in the funds. Performance-based fees are only charged to "Qualified Clients" who, in general terms, have a net worth greater than \$2,100,000, exclusive of their primary residence, or those for whom we manage a minimum of \$1,000,000, as measured from the beginning of our agreement for services. Further information about these investments is available in Item 10 below.

#### Types of Clients - Item 7

We generally offer investment advisory services to individuals, pension and profit sharing plans and participants, trusts, estates, charitable organizations, corporations, and other business entities.

FFO generally requires a minimum account size of \$500,000 for advisory accounts. However, from time-to-time, in its sole discretion, FFO may accept smaller accounts based on various criteria, such as anticipated future assets, related accounts, and other factors.

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

We may use one or more of the following methods of analysis and/or investment strategies when providing investment advice to you:

- *Fundamental Analysis* – involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The primary risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.
- *Technical Analysis* – technical analysis is a technique that relies on the assumption that current market data (such as charts of price, volume, and open interest) can help predict future market trends, at least in the short term. It assumes that market psychology influences trading and can predict when stocks will rise or fall. Technical trading models are mathematically driven based upon historical data and trends of domestic and foreign market trading activity, including various industry and sector trading statistics within such markets. Technical trading models, through mathematical algorithms, attempt to identify when markets are likely to increase or decrease and identify appropriate entry and exit points. The primary risk of technical trading models is that historical trends and past performance cannot predict future trends, and there is no assurance that the mathematical algorithms employed are designed properly, updated with new data, and can accurately predict future market, industry, and sector performance.

We may use one or more of the following investment strategies when advising you on investments:

- *Long Term Purchases* – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Using a long-term purchase strategy generally assumes the financial markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.
- *Short Term Purchases* – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price

fluctuations. Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

- *Trading* – securities are sold within 30 days. The principal type of risk associated with trading is market risk. There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and government, economic or monetary policies. Additionally, trading is speculative. Market movements are difficult to predict and are influenced by, among other things, government trade, fiscal, monetary and exchange control programs and policies; changing supply and demand relationships; national and international political and economic events; changes in interest rates; and the inherent volatility of the marketplace. In addition, governments from time to time intervene, directly and by regulation, in certain markets, often with the intent to influence prices directly. The effects of governmental intervention may be particularly significant at certain times in the financial instrument markets and such intervention (as well as other factors) may cause these markets to move rapidly.
- *Option Writing* – an option is the right either to buy or sell a specified amount or value of a particular underlying investment instrument at a fixed price (i.e. the “exercise price”) by exercising the option before its specified expiration date. Options giving you the right to buy are called “call” options. Options giving you the right to sell are called “put” options. When trading options on behalf of a client, we generally use covered options. Covered options involve options trading when you own the underlying instrument on which the option is based. Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.
- *Margin Transactions* – margin strategies allow an investor to purchase securities on credit and to borrow on securities already in their custodial account. Interest is charged on any borrowed funds for the period of time that the loan is outstanding. When you purchase securities, you may pay for the securities in full or you may borrow part of the purchase price from your broker/dealer. If you intend to borrow funds in connection with your account, you will be required to open a margin account, which will be carried by the broker/dealer of your account. The securities purchased in such an account are the broker/dealer’s collateral for its loan to you. If the securities in a margin account decline in value, the value of the collateral supporting this loan also declines, and, as a result, a brokerage firm is required to take action, such as issue a margin call and/or sell securities or other assets in your accounts, in order to maintain necessary level of equity in the account. It is important that you fully understand the risks involved in trading securities on margin, which are applicable to any margin account that you may maintain, including any Margin Account that may be established as a part of our advisory services and held by your broker/dealer. These risks include the following:
  1. You can lose more funds than you deposit in your margin account.
  2. The broker/dealer can force the sale of securities or other assets in your account.
  3. The broker/dealer can sell your securities or other assets without contacting you.
  4. You may not be able to choose which securities or other assets in your margin account are liquidated or sold to meet a margin call.
  5. The broker/dealer may move securities held in your cash account to your margin account and pledge the transferred securities.
  6. You may not be entitled to an extension of time on a margin call.

**Investing in securities involves risk of loss that clients should be prepared to bear.**

The investment advice provided along with the strategies suggested by FFO will vary depending on each client's specific financial situation and goals. This brief statement does not disclose all of the risks and other significant aspects of investing in financial markets. In light of the risks, you should fully understand the nature of the contractual relationship(s) into which you are entering and the extent of your exposure to risk. Certain investing strategies may not be suitable for many members of the public. You should carefully consider whether the strategies employed would be appropriate for you in light of your experience, objectives, financial resources and other relevant circumstances.

**Recommendation of Particular Types of Securities:** As disclosed under the "Advisory Business" section in this Brochure, we provide advice on various types of securities and we do not necessarily recommend one particular type of security over another since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it.

**General Investment Risk:** All investments come with the risk of losing money. Investing involves substantial risks, including complete possible loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses. Different market instruments carry different types and degrees of risk and you should familiarize yourself with the risks involved in the particular market instruments in which you intend to invest.

**Loss of Value:** There can be no assurance that a specific investment will achieve its investment objectives and past performance should not be seen as a guide to future returns. The value of investments and the income derived may fall as well as rise and investors may not recoup the original amount invested. Investments may also be affected by any changes in exchange control regulation, tax laws, withholding taxes, international, political and economic developments, and governmental economic or monetary policies.

**Interest Rate Risk:** Fixed income securities and funds that invest in bonds and other fixed income securities may fall in value if interest rates change. Generally, the prices of debt securities rise when interest rates fall, and their prices fall when interest rates rise. Longer-term debt securities are usually more sensitive to interest rate changes.

**Credit Risk:** Investments in bonds and other fixed income securities are subject to the risk that the issuer(s) may not make required interest payments. An issuer suffering an adverse change in its financial condition could lower the credit quality of a security, leading to greater price volatility of the security. A lowering of the credit rating of a security may also offset the security's liquidity, making it more difficult to sell. Funds investing in lower quality debt securities are more susceptible to these problems and their value may be more volatile.

**Foreign Exchange Risk:** Foreign investments may be affected favorably or unfavorably by exchange control regulations or changes in the exchange rates. Changes in currency exchange rates may influence the share value, the dividends or interest earned and the gains and losses realized. Exchange rates between currencies are determined by supply and demand in the currency exchange markets, the international balance of payments, governmental intervention, speculation, and other economic and political conditions. If the currency in which a security is denominated appreciates against the US Dollar, the value of the security will increase. Conversely, a decline in the exchange rate of the currency would adversely affect the value of the security.

**Risks Associated with Investing in Equities:** Investments in equities generally refers to buying shares of stocks by an individual or firms in return for receiving a future payment of dividends and capital gains if the value of the

stock increases. There is an innate risk involved when purchasing a stock that it may decrease in value and the investment may incur a loss.

**Risks Associated with Investing in Mutual Funds:** Mutual funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. The returns on mutual funds can be reduced by the costs to manage the funds. In addition, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, other types of mutual funds do charge such fees which can also reduce returns.

**Risks Associated with Investing in Exchange Traded Funds (ETF):** Investing in stocks & ETF's carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Investments in these securities are not guaranteed or insured by the FDIC or any other government agency.

**Risks Associated with Investing in Private Placement Offerings and Private Funds:** Private investment funds are not registered with the Securities and Exchange Commission and may not be registered with any other regulatory authority. Accordingly, they are not subject to certain regulatory restrictions and oversight to which other issuers are subject. There may be little public information available about their investments and performance. Moreover, as sales of shares of private investment companies are generally restricted to certain qualified purchasers, it could be difficult for a client to sell its shares of a private investment company at an advantageous price and time. Since shares of private investment companies are not publicly traded, from time to time it may be difficult to establish a fair value for the client's investment in these companies.

**Alternatives:** Non-traded REITs, business development companies, limited partnerships, and direct alternatives are subject to various risks such as liquidity and property devaluation based on adverse economic and real estate market conditions and may not be suitable for all investors. A prospectus that discloses all risks, fees and expenses may be obtained from your advisor. Read the prospectus carefully before investing. This is not a solicitation or offering which can only be made in conjunction with a copy of the prospectus. Investors considering an investment strategy utilizing alternative investments should understand that alternative investments are generally considered speculative in nature and may involve a high degree of risk, particularly if concentrating investments in one or few alternatives investments.

**Risks Associated with Investing in Options:** Transactions in options carry a high degree of risk. A relatively small market movement will have a proportionately larger impact, which may work for or against the investor. The placing of certain orders, which are intended to limit losses to certain amounts, may not be effective because market conditions may make it impossible to execute such orders. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

#### Disciplinary Information - Item 9

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of us or of the integrity of our management. Neither we nor our management persons have a history of material legal or disciplinary events.

#### Other Financial Industry Activities or Affiliations - Item 10

##### **Insurance Services**

Certain Executive officers and other Associated Persons of FFO are licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to clients of FFO. Insurance commissions earned by these persons are separate and in addition to FFO's advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. **Clients of our firm are under no obligation, contractually or otherwise, to purchase insurance products through any person or entity affiliated with our firm.**

##### **Accounting Services**

Noah Rosenfarb, an Associated Person of FFO, is a Certified Public Accountant and offers a wide range of accounting services to individuals and business clients. Mr. Rosenfarb will offer these services to clients of FFO, including family office service clients of our firm. As such, clients should be aware that a conflict of interest is inherent in such an arrangement. Associated Persons of our firm have a fiduciary responsibility to place the interests of the client first. **Clients of our firm are under no obligation, contractually or otherwise, to obtain accounting services through any person or entity affiliated with our firm.**

##### **Related Investment Advisers**

###### IWM Advisors, LLC

IWM Advisors, LLC, one of the principal owners of FFO is a New York based registered investment adviser. Peter Culver, an Associated Person of FFO is the sole owner of IWM Advisors, LLC. Mr. Culver devotes about 50% of his time to his activities at IWM Advisors, LLC. FFO and IWM Advisors, LLC are not expected to have joint client relationships.

###### Freedom Wealth Advisors, LLC

Noah Rosenfarb, an Associated Person of FFO, is the sole owner of Freedom Wealth Advisors, LLC, a Florida based registered investment adviser. Mr. Rosenfarb devotes a negligible amount of his time to his activities at Freedom Wealth Advisors, LLC. FFO and Freedom Wealth Advisors, LLC are not expected to have joint client relationships.

###### Freedom Internet Group Inc.

Noah B. Rosenfarb, an Associated Person of FFO, is the Chief Financial Officer and a shareholder of Freedom Internet Group, Inc., a Puerto Rico based public company engaged in the business of acquiring, holding and managing royalty interests derived from Internet based businesses. Royalty interests are passive (non-operating) agreements that provide Freedom Internet Group, Inc. with contractual rights to revenue produced from our operators. Clients should note that FFO will not charge advisory fees and will not exercise discretionary authority over Freedom Internet Group, Inc. positions held in client accounts. Additional information about this entity and related conflicts of interest are disclosed in Item 11 below.

##### **Affiliated Ventures**

Freedom adVentures, Inc.

Mr. Rosenfarb is the principal beneficial owner and consultant for Freedom adVentures, Inc., a corporation that provides consulting and/or management services to various businesses, including pooled investment vehicles and their general partners or managers. Among Freedom adVentures, Inc.'s consulting clients are:

- Freedom Internet Fund, LP
- Freedom Income Fund Management, LLC (Freedom Income Fund I Series)
- Freedom Real Estate Series 1 - a separate series of Freedom Income Fund Management, LLC

Freedom adVentures, Inc. also acts as a manager, managing member, or as a manager of the general partner for the following entities:

- Freedom Woods Estates, LLC
- Freedom Park Valley, LP
- Freedom Villas at Panthersville, LP
- Freedom Langley Place, LP
- Freedom Wilton Pointe Management, LLC
- Freedom St. James Place, LLC

Mr. Rosenfarb may be invested in the above-mentioned entities as a limited partner or member. Interests in these pooled investment vehicles are offered to persons who are "accredited investors" as defined in Rule 501(a) of Regulation D under the Securities Act and certain non-accredited investors who have sufficient knowledge and experience in financial and business matters to make them capable of evaluating the merits and risks of an investment in these vehicles. An investment in these pooled investment vehicles will be suitable only for investors who have adequate means of providing for current needs and personal contingencies, can bear the economic risk of the investment, and have no need for liquidity in the investment. Investors will be required to make representations to the foregoing effect as a condition to acceptance of their subscription. Investors in these vehicles will receive a confidential private placement memorandum or an equivalent disclosure document that provides further detail about the management, fees, conflicts of interest, and risks associated with these investments. Clients of FFO may be solicited to invested in these pooled investment vehicles. **However, Clients of our firm are under no obligation, contractually or otherwise, to invest in these offering and are free to invest in the pooled investment vehicle(s) of their choice.**

#### **Recommendation of Other Advisors**

We may recommend that you use a third party advisor (TPA) as part of our asset allocation and investment strategy. FFO may share in the compensation received by the TPA for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the third party advisor. In order to address this conflict, the firm has adopted a code of ethics that obliges all associated persons to deal fairly with all clients when taking investment action and to uphold their fiduciary duty and to put the client's interest first. Clients are not required to use the services of any TPA we recommend.

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

#### **Description of Our Code of Ethics**

FFO has adopted a Code of Ethics (the "Code") to address investment advisory conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes FFO's policies and procedures developed to protect client's interests in relation to the following topics:

- The duty at all times to place the interests of clients first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code;



- The responsibility to avoid any actual or potential conflict of interest or misuse of an employee's position of trust and responsibility;
- The fiduciary principle that information concerning the identity of security holdings and financial circumstances of clients is confidential; and
- The principle that independence in the investment decision-making process is paramount.

A copy of FFO's Code of Ethics is available upon request to our firm at (917) 697-4156 or at [peter@freedomfamilyoffice.com](mailto:peter@freedomfamilyoffice.com).

#### **Participation or Interest in Client Transactions**

As noted above in Item 10, advisory clients of FFO may invest in, maintain an investment in or be solicited to invest in one or more publicly traded entities and/or private placements affiliated with FFO (Related Ventures). Clients should note that the recommendation of investments in these Related Ventures creates a conflict of interest because our firm, our affiliates, and other persons associated with our firm may have an incentive to recommend affiliated Related Ventures over other investments that have no relationship with FFO, for the purposes of generating additional revenue for the firm and for themselves. To address this conflict, FFO does not charge its clients who have invested in the Related Ventures advisory fees on the portion of the clients' assets invested in any affiliated Related Venture. Clients should note that FFO will receive fees from the Related Ventures for investment management and/or other services FFO and persons associated with the firm provide to or for the benefit of the Related Ventures. Additionally, Associated Persons of the firm are required to uphold their fiduciary duty of acting in our clients' best interests and in connection therewith, will prepare and maintain records supporting any resulting recommendation of an affiliated Related Venture. **Clients of our firm are under no obligation, contractually or otherwise, to invest in these offerings and are free to invest in the pooled investment vehicle(s) of their choice.**

#### **Personal Trading Practices**

At times, FFO and/or its related persons may take positions in the same securities as clients, which may pose a conflict of interest with clients. In an effort to uphold our fiduciary duties to clients, FFO and its related persons will generally be "last in" and "last out" for the trading day when trading occurs in close proximity to client trades. Front running (trading shortly ahead of clients) is prohibited. Should a conflict occur because of materiality (e.g., a thinly traded stock), disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (e.g., a purchase or sale which is minimal in relation to the total outstanding value, and as such would have negligible effect on the market price) would not be deemed a material conflict requiring disclosure at the time of trading.

#### **Brokerage Practices - Item 12**

FFO recommends that you establish brokerage accounts with LPL Financial LLC ("LPL"), a registered broker-dealer and member SIPC, to maintain custody of assets and to effect trades. Factors which FFO considers in recommending LPL to Clients include their respective financial strength, reputation, execution, pricing, research and service. LPL enables FFO to obtain many mutual funds without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by LPL may be higher or lower than those charged by other Financial Institutions.

LPL provides FFO with access to its institutional trading and custody services, which are typically not available to retail investors. LPL services include brokerage, custody, research, 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 FFO's Client accounts maintained in custody, LPL charges account holders transaction related fees for securities trades. LPL provides FFO assistance in managing and administering Clients' accounts. These include access to Client account data, facilitate trade execution, provide research, and facilitate payment of FFO management fees from its Clients' accounts, recordkeeping, and Client reporting.

LPL also makes available to FFO other services intended to help FFO manage and further develop its business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

In choosing a broker-dealer or negotiating commission rates, we are not obligated to seek competitive bids or the lowest commission cost to you; but we determine that the commission rate charged is reasonable based on the quality of custodial services available to our Clients. As a fiduciary, FFO endeavors to act in your best interest.

The commissions paid by FFO's Clients comply with FFO's duty to obtain "best execution." Clients may pay commissions that are higher than another qualified *Financial Institution* might charge to effect the same transaction where FFO determines that the commissions are 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 Financial Institution's services, including among others, the value of research provided, execution capability, commission rates, and responsiveness. FFO seeks competitive rates but may not necessarily obtain the lowest possible commission rates for Client transactions.

#### **Trade Aggregation**

While individual Client advice is provided to each account, Client trades can be executed as a block trade. The executing broker will be informed that the trades are for the account of FFO's Clients and not for FFO itself. No advisory account within the block trade will be favored over any other advisory account, and thus, each account will participate in an aggregated order at the average share price and receive the same commission rate. The aggregation should, on average, reduce slightly the costs of execution. We will not aggregate a Client's order if in a particular instance we believe that aggregation would cause the Client's cost of execution to be increased. The broker dealer will be notified of the amount of each trade for each account. FFO and/or its Associated Persons may participate in block trades with Clients, and may also participate on a pro rata basis for partial fills, but only after the determination has been made that Clients will receive fair and equitable treatment.

#### **Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

#### **Brokerage for Client Referrals**

We do not receive client referrals from broker-dealers and custodians with which we have an institutional advisory arrangement. Also, we do not receive other benefits from a broker-dealer in exchange for client referrals.

#### **Directed Brokerage**

The client may direct brokerage to a specified broker-dealer other than the firm recommended by FFO. In the event that a client directs FFO to use a particular broker-dealer, the firm may not be authorized under these circumstances to negotiate commissions and may not be able to obtain volume discounts or best execution. In addition, under these circumstances a disparity in commission charges may exist between the commissions charged to clients who direct the firm to use a particular broker-dealer and those who do not.

#### Review of Accounts - Item 13

##### **Portfolio Management Account Reviews**

FFO monitors client account holdings on a continuous basis and conducts formal account reviews at least annually. Accounts are reviewed by the Associated Person assigned to the account. Reviews may be conducted in person, over the phone, or via internet-based video conference call services, such as ZOOM.

Additional reviews may be offered in certain circumstances. Triggering factors that may stimulate additional reviews include, but are not limited to, changes in economic conditions, changes in the client's financial situation or investment objectives, or upon client request.

Clients will receive statements directly from their account custodian(s) at least quarterly. FFO may also provide performance reports on an as needed basis.

#### Client Referrals and Other Compensation - Item 14

FFO has brokerage and clearing arrangements with LPL and the firm will receive additional benefits from them in the form of electronic delivery of client information, electronic trading platforms, institutional trading support, proprietary and/or third party research, continuing education, practice management advice, and other services provided by custodians for the benefit of investment advisory clients.

FFO does not currently have any client referral or compensation agreements with outside parties for domestic accounts as defined by Rule 206(4)-3 of the Investment Advisers Act of 1940 or similar state statute.

##### **Recommendation of Other Advisors**

We may recommend that you use Third Party Adviser (TPAs) as part of our asset allocation and investment strategy. FFO will share in the compensation received by the TPA for managing your account. The compensation arrangement presents a conflict of interest due to a financial incentive to recommend the services of the TPA. You are not required to use the services of any TPA we recommend.

#### Custody - Item 15

Client funds and/or securities (assets) are held at unaffiliated, qualified custodians. However, FFO is deemed to have custody over client funds and securities for the following of reasons:

- Associated Persons of FFO serve as trustees and/or obtain a power of attorney over certain accounts for which we provide investment advisory services. These accounts will be held with a bank, broker-dealer, or other independent, qualified custodian. As such, FFO has retained an unaffiliated accountant to conduct an annual exam of our books and records and to report their findings to the SEC.
- We may recommend that clients invest in private placements that are affiliated with our related persons. If required by SEC rules, the private placements are subject to audit at least annually and distribute their audited financial statements prepared in accordance with generally accepted accounting principles to all investors. Also, as required, the audits are conducted by an independent public accountant that is registered with the Public Company Accounting Oversight Board in accordance with its rules.
- FFO is also deemed to have custody of client assets where it has fee deduction authority granted by the client in the investment advisory agreement and in certain situations where we accept standing letters

of authorization from clients to transfer assets to third parties. We maintain safeguards in accordance with regulatory requirements regarding custody of client assets.

Clients will receive account statements at least quarterly from the broker-dealer or other qualified custodian holding their assets. Clients are urged to review custodial account statements for accuracy.

#### Investment Discretion - Item 16

FFO offers Portfolio Management Services on a discretionary basis. Clients must grant discretionary authority in the management agreement. Discretionary authority extends to the types and amounts of securities to be bought and sold in client accounts. Apart from the ability to withdraw management fees, FFO does not have the ability to withdraw funds or securities from the client's account. The client provides FFO discretionary authority via a limited power of attorney in the management agreement and in the contract between the client and the custodian.

If you wish, you may limit our discretionary authority, for example, by setting a limit on the type of securities that can be purchased for your account. Simply provide us with your restrictions or guidelines in writing. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

#### Voting Client Securities - Item 17

FFO does not vote proxies. It is the client's responsibility to vote proxies. Clients will receive proxy materials directly from the custodian. Questions about proxies may be made via the contact information on the cover page.

#### Financial Information - Item 18

We are required in this Item to provide you with certain financial information or disclosures about FFO's, financial condition. FFO does not require the prepayment of over \$1,200, six or more months in advance. Additionally, FFO has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and it has not been the subject of a bankruptcy proceeding.

#### Requirements of State-Registered Advisers - Item 19

**This section is not applicable because our firm is SEC registered.**

#### **Freedom Family Office, LLC Privacy Notice**

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

#### **INFORMATION WE COLLECT**

Freedom Family Office, LLC (FFO) must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others;
- information we receive from a consumer reporting agency.

#### **INFORMATION WE DISCLOSE**

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Section 248.13 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain nonaffiliated third parties such as our attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

#### **CONFIDENTIALITY AND SECURITY**

We restrict access to nonpublic personal information about you to those Employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.

#### **ACCURACY**

FFO strives to maintain accurate personal information in our client files at all times. However, as personal situations, facts and data change over time; we encourage our clients to provide feedback and updated information to help us meet our goals.