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# FRONT FINANCIAL, INC.

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## PART 2A OF FORM ADV: FIRM BROCHURE

March 14, 2022

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This brochure provides information about the qualifications and business practices of Front Financial, Inc. ("Front"). If you have any questions about the contents of this brochure, please contact us at (415) 816-9815. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Front is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Registration with the SEC as a registered investment adviser pursuant to the Investment Advisers Act of 1940, as amended (the "Advisers Act"), does not imply a certain level of skill or training.

## **Item 2        Material Changes**

There are no materials since the last update to this brochure in December of 2021.

Front has made other non-material updates to this document.

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## **Item 4      Advisory Business**

Front Financial, Inc. a Delaware corporation, was established in 2020 with an office in San Francisco, CA. The firm's principal owner is Bam Azizi who also serves as Chief Executive Officer.

Front provides an interactive investment platform through a user-friendly application (the "app") that provides clients with tools to assist in managing their investments. The app is designed to help clients build their portfolio by providing recommendations with respect to diversification and investment strategies based upon each individual user's preferences, objectives, and risk tolerance. Front collects information from each client when they sign up for the app, including specific information about a client's financial situation, investment experience and overall investment objectives. In addition, clients have the option of granting Front access to view their brokerage account information via secure connections that are linked to the app. Investment recommendations are then generated and presented to the client based on the information provided. The investment recommendations are generated by the algorithms utilized in the app. Clients are responsible for evaluating the investment recommendations and making the determination as to whether they choose to execute one or more transactions as a result of such recommendations.

At no time do clients share their third-party login credentials with Front, nor are they ever accessed or stored by Front.

Front currently provides recommendations only with respect to exchange listed equity securities.

Front does not participate in wrap fee programs.

Front is an internet-based adviser registered with the SEC under the multi-state adviser exemption and currently does not have any authority over client assets. Front may, in the future, have the ability to execute transactions with a client's broker via the secure connections within the app based upon recommendations that were made to such clients.

In addition, in June 2021, Front launched its Social Platform within the App. The platform is a community where the clients as well as Front employees can discuss their portfolios, investing, and the financial market in general. clients are not required to participate in the Social Platform when utilizing the App. Front permits paid endorsements and testimonials on the Social Platform, with appropriate disclosures in compliance with the Adviser's Act, as describes in the Fees and Compensation section, below.

## **Item 5      Fees and Compensation**

Front does not currently charge any fees for basic advisory services and/or access to the app. Currently, basic services include establishing a user account on the app, provision of single stock Front Scores, linking of outside brokerage accounts, and provision of aggregated Front Score for such portfolios. Front is introducing a premium service for which it will charge an access fee for activities such as Front Score-based portfolio optimization. Fees for such premium services are assessed at the time of service where clients elect a single-service option and on a monthly basis, in advance where clients elect to purchase a subscription to such services. Clients will incur brokerage and other transaction costs associated with their accounts as agreed upon with each of their respective brokers and custodians. Front does not currently receive any payments from brokers, custodians or any other

third parties relating to its provision of investment advisory services.

Front compensates individuals for reviews, feedback, social media “mentions” (i.e., naming or discussing Front on an individual or group’s social media profile), and opinions about Front and its platform and related services. Any client’s statement of his or her experience with, or approval of Front will be treated as testimonial, and any statement or endorsement made by a third-party about Front’s services will be treated as an endorsement. Such endorsements or testimonials inherently pose a conflict of interest and are considered misleading without proper disclosure and due diligence.

In addition, Front engages in cross-promotion with select third-parties whose services Front recommends to clients. This creates a conflict of interest due to the fact that such cross-promotion and related revenue sharing between third-parties and Front incentivizes Front to recommend such third-party services to clients. All such relationships and related conflicts are disclosed to clients at the time of promotion or recommendation of third-party services. Front associates itself with reputable vendors who Front believes will provide beneficial services to clients.

Any arrangement whereby individuals or groups post reviews or opinions for which they were compensated by Front are disclosed as such, as well as the fact that the review, feedback, or opinion is representative of the reviewer’s own experience and not necessarily that of every Front Financial client. Front performs due diligence to screen for “bad actors” prior to entering into any agreement regarding testimonials and/or endorsements. Front is not responsible for providing disclosure for unsolicited endorsements posted by third-parties and may share articles or statements relating to such endorsements, provided they do not also include statements made by clients regarding their experience with Front (i.e., testimonials).

Front’s management of its own social platform also poses a conflict of interest due to Front’s control of the content. Front monitors content and reserves the right to remove harmful or abusive commentary or any comments or posts that violate its Community Standards from its Social Platform. However, Front does not remove negative opinions about Front or display positive comments to visible locations on the platform. All commentary on the Social Platform is displayed fairly in equal measure.

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

Front does not charge performance-based fees.

## **Item 7      Types of Clients**

Front provides advice to individuals of all income levels and does not impose any account minimums.

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

### **Investment Strategies and Methods of Analysis**

Front utilizes proprietary, automated computer algorithms to build strategies and recommendations based on a user's preference and risk tolerance. Front will present clients with recommended investments based on the financial information and investment preferences shared when signing up for the app. Recommendations may be presented in the form of a single stock to trade, and may also include details such as a recommended price target and/or type of order (e.g. market order, limit order, etc.). All recommendations have a quality rating by way of an associated Front Score, which is Front's proprietary investment security rating model that uses a numerical range.

As previously noted, Front does not have any authority or discretion over client assets. Once a client receives their recommendation(s), they make the decision whether or not to make any changes to their portfolio, including whether they should seek advice from any third-party advisors. Clients are responsible for executing any transactions which may be done from within their third-party brokerage accounts previously connected within the app or directly with third-party brokerage accounts not connected to the app.

Access to the app provides clients with a variety of information, including but not limited to, the following:

- An update on the current market environment that includes stock prices, news and a proprietary score for each stock.
- An overview of their portfolio in order to evaluate risk parameters and performance.
- A planning section that presents potential changes to the portfolio in conjunction with certain risk/reward parameters.

### **Risk of Loss**

All investing and trading activities risk the loss of capital. Front cannot guarantee any level of performance or that clients will not incur a loss of capital. The following risks are not meant to be all inclusive, but should be considered prior to engaging Front for its advisory services.

#### Advisory Risk

There is no guarantee that Front's algorithm, analysis or recommendations pertaining to particular securities or strategies will produce the intended results. Our judgment may not be correct and clients may not achieve their investment objectives. In addition, there is a risk that Front or its clients may experience computer issues, including equipment or app failure, loss of internet access, viruses, or other events that may impair our ability to provide advisory services.

#### General Market Risk

The price of any security or the value of an entire asset class can decline for a variety of reasons that Front cannot control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events.

## Equity Securities Generally

The value of equity securities generally varies with the performance of the issuer and movements in the equity markets. Investors in equity securities may lose a substantial portion of their principal.

### **Item 9      Disciplinary Information**

There are no legal or disciplinary events that are material to a client's evaluation of Front or the integrity of our management or any employee of our Firm.

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

Neither Front nor any of its management persons is registered, or has an application pending to register, as a broker-dealer or registered representative of a broker-dealer.

Neither Front nor any of its management persons is registered, or has applied to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person thereof.

None of Front's employees or officers have relationships with related parties in the financial services industry that materially affect Front's advisory service or any member.

None of Front's employees or officers recommend or select investment advisers for clients, or have any business relationships with other investment advisers.

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

Front has adopted a Code of Ethics that sets forth our commitment to the high legal and ethical standards of conduct dictated by our fiduciary, federal securities law and other regulatory obligations and applies to all of our employees and officers. The Code of Ethics includes policies and procedures relating to personal trading, gifts and entertainment involving business associates, outside activities, charitable donations as well as other potential or actual conflicts of interest. All employees and officers must acknowledge receipt of the Code of Ethics and report any violations of the Code to the Chief Compliance Officer.

Front does not have discretion over client accounts. Therefore, it is possible that employees may independently invest in the same securities that are held by and/or recommended to clients.

A copy of our Code of Ethics will be provided to any client upon written request.

### **Item 12      Brokerage Practices**

Front does not select or recommend brokers for client transactions.

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

Although Front has real time access to a client's portfolio in order to provide recommendations as previously described, Front does not perform any ongoing monitoring of client accounts and does not provide any reporting to clients other than the information available within the app as described in Item 8.

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

Front does not receive economic benefits from third parties for providing investment recommendations, nor do we compensate any third party for client referrals.

### **Item 15      Custody**

Front does not maintain custody of client funds, securities or other assets.

### **Item 16      Investment Discretion**

Front does not have discretionary authority to manage client assets.

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

Front does not have authority to vote securities on behalf of clients and does not provide advice as to how clients should vote.

### **Item 18      Financial information**

Front does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance and does not have any financial condition that would impair its ability to meet contractual commitments to clients.

### **Item 19      Requirements for State-Registered Advisers**

This item is not applicable to Front.