



## **Byrne Financial Freedom, LLC**

### **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 27, 2023**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Byrne Financial Freedom, LLC (“Byrne Financial” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (508) 528-9366.

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

Additional information about Byrne Financial and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 167893.

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## Item 2 – Material Changes

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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 Byrne Financial. For convenience, the Advisor has combined these documents into a single disclosure document.

Byrne Financial 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. Byrne Financial encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

### Material Changes

The following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has amended its fees for Wealth Management Services. Please see Item 5 for more information.
- The Advisor has amended its fees for Retirement Plan Advisory services. Please see Item 5 for more information.

### 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 with the Advisor's firm name or CRD# 167893. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (508) 528-9366.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Byrne Financial Freedom, LLC (“Byrne Financial” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a limited liability company (“LLC”) under the laws of the Commonwealth of Massachusetts. Byrne Financial was founded in 2006 and became a registered investment advisor in August 2013. Byrne Financial is owned and operated by Joseph Byrne (Owner and Chief Executive Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Byrne Financial.

### **B. Advisory Services Offered**

Byrne Financial offers wealth management services to individuals, high net worth individuals, trusts, estates, charitable organizations and other businesses (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Byrne Financial’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.

#### Wealth Management Services

Byrne Financial provides Clients with wealth management services, which generally includes a broad range of comprehensive financial planning services and access to a wealth management software in connection with discretionary management of investment portfolios. These services are described below.

*Investment Management Services* - Byrne Financial provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Byrne Financial works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Byrne Financial will then construct a portfolio, consisting of low-cost, mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds and/or real estate investment trusts (“REITs”) to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy investments based on portfolio fit and/or tax considerations.

Byrne Financial selects, recommends and/or retains mutual funds on a fund by fund basis and seeks to use non-retail or institutional classes when possible. Due to specific custodial or mutual fund company constraints, and/or material tax consideration, Byrne Financial may select, recommend and/or retain a mutual fund share class that has a higher expense ratio than an equivalent share class. Byrne Financial will seek to select the lowest cost share class available that is in the best interest of each Client and will ensure the selection aligns with the Client’s financial objectives and state investment guidelines.

Byrne Financial’s investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Byrne Financial will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Byrne Financial evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Byrne Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Byrne Financial may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the

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

*Retirement Accounts* – When the Advisor provides investment advice to Clients regarding ERISA retirement accounts or individual retirement accounts (“IRAs”), the Advisor is a fiduciary within the meaning of Title I of the Employee Retirement Income Security Act (“ERISA”) and/or the Internal Revenue Code (“IRC”), as applicable, which are laws governing retirement accounts. When deemed to be in the Client's best interest, the Advisor will provide investment advice to a Client regarding a distribution from an ERISA retirement account or to roll over the assets to an IRA, or a similar transaction including rollovers from one ERISA sponsored Plan to another, one IRA to another IRA, or from one type of account to another account (e.g. commission-based account to fee-based account). Such a recommendation creates a conflict of interest if the Advisor will earn a new (or increase its current) advisory fee as a result of the transaction. No client is under any obligation to roll over a retirement account to an account managed by the Advisor.

At no time will Byrne Financial 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 their designated account[s] at the Custodian, pursuant to the wealth management agreement, please see Item 12 – Brokerage Practices.

*Use of Independent Managers* – When deemed to be in the Client's best interest, Byrne Financial will recommend to Clients that all or a portion of their investment portfolio be implemented by utilizing one or more unaffiliated money managers or investment platforms (collectively “Independent Managers”). Independent Managers may be sourced directly or accessed through an investment management platform. The Client may be required to enter into a separate agreement with the Independent Manager[s] and/or provide authorization through its custodial application to utilize the Independent Manager[s].

Byrne Financial serves as the Client's primary advisor and relationship manager. However, the Independent Manager[s] will assume discretionary authority for the day-to-day investment management of those assets placed in their control. Byrne Financial will assist and advise the Client in establishing investment objectives for their account[s], the selection of the Independent Manager[s], and defining any restrictions on the account[s]. Byrne Financial will continue to provide oversight of the Client's account[s] and ongoing monitoring of the activities of these unaffiliated parties.

The Independent Manager[s] will implement the selected investment strategies based on their investment mandates. The Client may be able to impose reasonable investment restrictions on these accounts, subject to the acceptance of these third parties.

The Client, prior to entering into an agreement with an Independent Manager, will be provided with the Form ADV Part 2A (or a brochure that makes the appropriate disclosures) of those parties. Byrne Financial does not receive any compensation from these Independent Managers or Investment Platforms, other than Byrne Financial's wealth management fee, as described in Item 5.

*Financial Planning Services* - Byrne Financial will typically provide a variety of financial planning and consulting services to Clients as part of its wealth management services. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings, estate/legacy planning, insurance needs, access to WealthVision<sup>SM</sup> and other areas of a Client's financial situation.

A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Byrne Financial may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

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

*Wealth Management Software* - Clients may also have access to WealthVision<sup>SM</sup>, a wealth management software that provides the Client with various financial management services, such as tracking of financial data, maintaining financial documents, and the aggregation of accounts and reporting across multiple financial institutions.

#### Retirement Plan Advisory Services

Plan Sponsors may engage Byrne Financial to serve as a 3(38) Fiduciary to their plan and assume investment discretion over the Plan. In such instances, the Plan Sponsor shall authorize this discretion to select and implement the Plan investment options. Services generally include:

- Ongoing Investment Recommendation and Assistance

#### **C. Client Account Management**

Prior to engaging Byrne Financial to provide wealth management services, each Client is required to enter into a wealth management agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Byrne Financial, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Byrne Financial will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk of each Client.
- Portfolio Construction – Byrne Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Byrne Financial will provide investment management and ongoing oversight of the Client's investment portfolio.

#### **D. Wrap Fee Programs**

Byrne Financial includes securities transaction fees together with its wealth management fees. Including these fees into a single asset-based fee is considered a "Wrap Fee Program". The Advisor customizes its wealth management services for its Clients. The Advisor sponsors the Byrne Financial Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client's account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.



## **E. Assets Under Management**

As of December 31, 2022, Byrne Financial manages \$290,377,826 in Client assets, \$290,299,467 of which are managed on a discretionary basis and \$78,359 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

## **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

### **A. Fees for Advisory Services**

#### Wealth Management Services

For Clients engaged for comprehensive wealth management services, the Client will be charged a single combined fee for investment management and financial planning services based on the market value of assets under management. The Advisor does not charge a separate fee for financial planning engagements.

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees are based on the market value of assets under management at the end of the prior calendar quarter.

Wealth management fees range from 0.25% to 2.50% annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

The wealth management fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Byrne Financial will be independently valued by the Custodian. Byrne Financial will conduct periodic reviews of the Custodian's valuations.

*Use of Independent Managers* – As noted in Item 4, the Advisor will implement all or a portion of a Client's investment portfolio utilizing one or more Independent Managers. To eliminate any conflict of interest, the Advisor does not earn any compensation from an Independent Manager. The Advisor will only earn its wealth management fee as described above. Independent Managers typically do not offer any fee discounts but may have a breakpoint schedule which will reduce the fee with an increased level of assets placed under management with an Independent Manager. The terms of such fee arrangements are included in the Independent Manager's disclosure brochure and applicable contract[s] with the Independent Manager. The total blended fee, including the Advisor's fee and the Independent Manager's fee, will not exceed 2.00% annually.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged an annual asset-based fee of up to 2.5%, billed in advance, pursuant to the terms of the agreement. Retirement plan fees are based on the market value of assets under management at the end of the prior quarter.

### **B. Fee Billing**

#### Wealth Management Services

Wealth management fees are calculated by the Custodian and deducted from the Client's account[s]. The Client shall instruct the Custodian to automatically deduct the wealth management fee from the Client's account[s] for each billing period and pay the wealth management fee[s] to the Advisor. The Custodian will utilize the fee rate, as defined in the wealth management agreement, to indicate the fee to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Byrne Financial at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting

deduction of the wealth management fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's quarterly statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting the Custodian to pay Byrne Financial by direct deduction from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

*Use of Independent Managers* – For Client accounts implemented through an Independent Manager, the Client's overall fees will include Byrne Financial's wealth management fee (as noted above) plus investment management fees and/or platform fees charged by the Independent Manager. The Independent Manager will assume the responsibility for calculating the Client's fees and deducting all fees from the Client's account[s].

#### Retirement Plan Advisory Services

Byrne Financial is compensated for its services at the beginning of the quarter before advisory services are rendered. Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Byrne Financial includes securities transactions costs as part of its overall investment advisory fee through the Byrne Financial Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure.

In addition, all fees paid to Byrne Financial for wealth management services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Byrne Financial, but would not receive the services provided by Byrne Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Byrne Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

#### Wealth Management Services

Byrne Financial is compensated for its services in advance of the quarter in which wealth management services are rendered. Either party may terminate the wealth management agreement, at any time, by providing advance notice to the other party. The Client may also terminate the wealth management agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Custodian will refund any unearned, prepaid wealth management fees from the effective date of termination to the end of the quarter. The Client's wealth management agreement with the Advisor is non-transferable without the Client's prior consent.

*Use of Independent Managers* – In the event that a Client should wish to terminate their relationship with an Independent Manager, the terms for termination will be set forth in the respective agreements between the Client and those Independent Manager[s]. Byrne Financial will assist the Client with the termination and transition as appropriate.

#### Retirement Plan Advisory Services

Either party may request to terminate their services with Byrne Financial in whole or in part, by providing advance notice to the other party. The Advisor will refund any unearned, prepaid investment advisory fees



from the effective date of termination to the end of the quarter. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's written approval.

#### **E. Compensation for Sales of Securities**

Byrne Financial does not buy or sell securities to earn commissions and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Advisory Persons of Byrne Financial are registered representatives of LPL Financial LLC ("LPL Financial"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as a registered representative of LPL Financial, an Advisory Person will implement securities transactions under LPL Financial and not through Byrne Financial. In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to Byrne Financial's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. We mitigate this conflict in two ways. First, Clients always have the right to choose whether to purchase securities products through one of our Advisory Persons. Second, Byrne Financial will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons. Please see Item 10 – Other financial Industry Activities and Affiliations.

Advisory Persons are also licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of Byrne Financial who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, to mitigate this conflict, Clients always have the right to choose whether to purchase insurance products through any person affiliated with Byrne Financial. Please see Item 10 – Other financial Industry Activities and Affiliations.

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

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

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Byrne Financial offers wealth management services to individuals, high net worth individuals, trusts, estates, charitable organizations and other businesses. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Byrne Financial generally does not impose a minimum account size for establishing a relationship. However, certain independent managers may impose minimums for their investment strategies.

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

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##### **A. Methods of Analysis**

Byrne Financial primarily employs fundamental analysis in developing investment strategies and independent managers for its Clients. Research and analysis from Byrne Financial is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, manager's performance and reputation, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

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Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Byrne Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Byrne Financial will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Byrne Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

## **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Byrne Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

### Structured Notes

Investment banks issue structured notes, which are debt obligations with an embedded derivative component. Therefore, structured notes are subject to credit risk in the event the issuing bank forfeits its obligations. The performance of a structured note is subject to market risk, including the possible loss of principal. The price of the structured note will fluctuate with the price of the underlying securities. The price of a structured note fluctuates based upon the market movements and the market value may dissociate from the intrinsic value of the underlying investments. A structured note purchased or sold at one point in time may have a different price than the same structured note purchased or sold a short time later. In addition, structured notes have liquidity risk due to low trading volume and inaccurate pricing. For some structured notes, it's possible for the issuer to redeem the note before maturity, regardless of the price. This means it's possible that an investor will be forced to receive a price that is different than the value of the underlying securities

### Annuities

With most annuities, you are committed to the contract period at the end of the initial free look period. After this period, you will be restricted from getting a refund of your full principal value until the termination of the contract period. Annuities are subject to credit risk in the event the issuer becomes insolvent. The performance of a variable annuities is subject to market risk. The price of a variable annuity will fluctuate with the price of the underlying securities. Fixed annuities are subject to purchasing power risk (the risk that inflation will be higher than the annuity's guaranteed rate). Most annuities charge a mortality and expense fee, some other fees only apply to certain types of annuities in the form of riders. When you buy an annuity, the insurance company you buy the annuity from is managing that risk, and you're paying a fee to limit your risk. Before buying an annuity, it's important to understand what you'll have to pay for the features you want.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

## **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Byrne Financial or its owner.** Byrne Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider with whom the Client engages. 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 with the Advisor's firm name or CRD# 167893.

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

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### Broker-Dealer Affiliation

As mentioned in Item 5.E above, Advisory Persons are also registered representative of LPL Financial. In one's separate capacity as a registered representative, Advisory Persons will receive commissions for the

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Byrne Financial Freedom, LLC  
11 East Street, Franklin, MA 02038  
Phone: (508) 528-9366 \* Fax: (508) 528-9369  
<http://www.byrnefinancialfreedom.com>

implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Advisory Persons. Neither the Advisor nor Advisory Persons will earn ongoing investment advisory fees in connection with any services implemented in Advisory Persons' separate capacity as a registered representative.

#### Insurance Agency Affiliations

Advisory Persons are also licensed insurance professionals. Implementations of insurance recommendations are separate and apart from one's role with Byrne Financial. As an insurance professional, an Advisory Person will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Advisory Persons or the Advisor.

#### Use of Independent Managers

As noted in Item 4, the Advisor may implement all or a portion of a Client's investment portfolio with one or more Independent Managers. The Advisor does not receive any compensation nor does this present a material conflict of interest. The Advisor will only earn its investment advisory fee as described in Item 5.A.

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

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#### **A. Code of Ethics**

Byrne Financial has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons associated with Byrne Financial ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to each Client. Byrne Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Byrne Financial's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code, please contact the Advisor at (508) 528-9366.

#### **B. Personal Trading with Material Interest**

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

#### **C. Personal Trading in Same Securities as Clients**

Byrne Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities Byrne Financial recommends (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, Byrne Financial must disclose to Clients and mitigate through policies and procedures. As noted above, the Advisor has adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Byrne Financial requiring reporting of personal securities trades pursuant to its Code of Ethics. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

#### **D. Personal Trading at Same Time as Client**

While Byrne Financial allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client

orders or traded afterward. **At no time will Byrne Financial, or any Supervised Person of Byrne Financial, transact in any security to the detriment of any Client.**

## **Item 12 – Brokerage Practices**

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### **A. Recommendation of Custodian[s]**

Byrne Financial does not have discretionary authority to engage 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 Byrne Financial to direct trades to the Custodian as agreed upon in the wealth management agreement. Further, Byrne Financial does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Byrne Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. As its Advisory Persons are also registered representatives of LPL Financial, Byrne Financial and its Advisory Persons are limited in the Custodian[s] in which they can recommend to Clients. Typically, Byrne Financial will recommend that Clients establish their accounts at LPL Financial, where Byrne Financial has access to LPL Financial's systems, back office support, research and other benefits. While Byrne Financial receives these economic benefits from LPL Financial, we believe LPL Financial provides quality execution and related services for our Clients at competitive prices. Price is not the sole factor Byrne Financial considers in evaluating best execution and the recommendation of the Custodian. Byrne Financial also considers the quality of the brokerage services provided by LPL Financial, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. Clients are free to use whatever broker-dealer/custodian they choose to implement financial planning recommendations. For investment advisory services, Byrne Financial would be required to obtain permission to use a broker-dealer/custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Please see Item 14.

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. Byrne Financial does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, Byrne Financial does receive economic benefits from its relationship with LPL Financial. Please see Item 14 below.

**2. Brokerage Referrals** - Byrne Financial 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 Byrne Financial 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] at the Custodian. 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]). Byrne Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

### **B. Aggregating and Allocating Trades**

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Byrne Financial will execute its transactions through the Custodian as directed by the Client. Byrne Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated



in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

## **Item 13 – Review of Accounts**

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### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Byrne Financial. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

### **B. Causes for Reviews**

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

### **C. Review Reports**

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

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

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### **A. Compensation Received by Byrne Financial**

Byrne Financial 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, Byrne Financial may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

Byrne Financial has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

### **B. Compensation for Client Referrals**

Byrne Financial does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.



## **Item 15 – Custody**

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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 Byrne Financial 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 Byrne Financial to ensure accuracy, as the Custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 – Brokerage Practices.

## **Item 16 – Investment Discretion**

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Byrne Financial 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 Byrne Financial. 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 a wealth management agreement containing all applicable limitations to such authority. All discretionary trades made by Byrne Financial will be in accordance with each Client's investment objectives and goals.

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

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

## **Item 18 – Financial Information**

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



## **Form ADV Part 2A Appendix 1 Wrap Fee Program Brochure**

**Effective: March 27, 2023**

This Form ADV 2A – Appendix 1 (“Wrap Fee Program Brochure”) provides information about the business practices and fees for Byrne Financial Freedom LLC (“Byrne Financial” or the “Advisor”) when Client transaction costs are included with investment advisory fees as a single fee (“Wrap Fee Program”). Byrne Financial sponsors this Wrap Fee Program and provides this Wrap Fee Program Brochure as a supplement to Byrne Financial’s Form ADV 2A (“Disclosure Brochure”), which provides complete details on the business practices of Byrne Financial. If you did not receive the complete Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the Disclosure Brochure, please contact the Advisor at (508) 528-9366.

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

Additional information about Byrne Financial and its Advisory Persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor’s firm name or CRD# 167893.

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**Byrne Financial Freedom, LLC**  
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<http://www.byrnefinancialfreedom.com>

## **Item 2 – Material Changes**

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Form ADV 2 Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses the fee billing practices of the Advisor as a supplement to the Disclosure Brochure.

### Material Changes

The following material changes have been made to this Wrap Fee Program Brochure since the last filing and distribution to Clients:

- The Advisor has amended its fees for Wealth Management Services. Please see Item 4 for more information.

### Future Changes

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

At any time, you may view the current Wrap Fee Program Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 167893. You may also request a copy of this Wrap Fee Program Brochure at any time by contacting the Advisor at (508) 528-9366.

## **Item 3 – Table of Contents**

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## **Item 4 – Services Fees and Compensation**

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### Services

Byrne Financial Freedom LLC (“Byrne Financial” or the “Advisor”) provides customized investment management services to individuals, high net worth individuals, trusts, estates, charitable organizations and other businesses (each referred to as a “Client”). This Wrap Fee Program Brochure is provided as a supplement to the Form ADV 2A (“Disclosure Brochure”). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Byrne Financial as an investment advisor.

As part of the wealth management fees noted in Item 5 of the Disclosure Brochure, Byrne Financial includes normal securities transaction fees as part of the overall wealth management fee. Securities regulations often refer to this combined fee structure as a “Wrap Fee Program”.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees charged by the Custodians into the single “bundled” investment advisory fee. This Wrap Fee Program Brochure references back to the Byrne Financial Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Byrne Financial’s wealth management services, investment philosophy and related services.**

### Program Costs

Advisory services provided by Byrne Financial are offered in a wrap fee structure whereby normal securities transaction costs are included in the overall wealth management fee paid to Byrne Financial. As the level of trading in a Client’s account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided be to each Client, however, the Client is not charged more if there is higher trading activity in the Client’s account[s]. A Wrap Fee Program structure has a conflict of interest as the Advisor has an incentive to limit the number of trades placed in the Client’s account[s] or to utilize no transaction fee (“NTF”) funds in order to lower overall costs to the Advisor. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

As noted in Item 4 of the Disclosure Brochure – Advisory Services of the Wrap Fee Program Brochure, Byrne Financial selects, recommends and/or retains mutual funds on a fund by fund basis and seeks to use non-retail or institutional classes when possible. Due to specific custodial or mutual fund company constraints, and/or material tax consideration, Byrne Financial may select, recommend and/or retain a mutual fund share class that has a higher expense ratio than an equivalent share class. Additionally, the Advisor’s recommended Custodians do not charge securities transaction fees for ETF and equity trades in a Client’s account, provided that the account meets the terms and conditions of the Custodian’s brokerage requirements. However, the Custodians typically charge for mutual funds and other types of investments.

### Fees

Wealth management fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the wealth management agreement. Wealth management fees range from 0.25% to 2.50%, annually based on several factors, including: the scope and complexity of the services to be provided; the level of assets to be managed; and the overall relationship with the Advisor. Relationships with multiple objectives, specific reporting requirements, portfolio restrictions and other complexities may be charged a higher fee.

Wealth management fees in the first quarter of service are prorated from the inception date of the account[s] to the end of the quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client’s fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Byrne Financial will be independently valued by the Custodian. Byrne Financial will conduct periodic reviews of the Custodian’s valuations.

Wealth management fees are calculated by the Custodian and deducted from the Client's account[s]. The Client shall instruct the Custodian to automatically deduct the wealth management fee from the Client's account[s] for each billing period and pay the wealth management fee[s] to the Advisor. The Custodian will utilize the fee rate, as defined in the wealth management agreement, to indicate the fee to be deducted from the Client's account[s] at the respective quarter-end date. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Byrne Financial at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the wealth management fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's quarterly statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting the Custodian to pay Byrne Financial by direct deduction from their account[s] held by the Custodian as part of the wealth management agreement and separate account forms provided by the Custodian.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s] which are not included as part of the Wrap Fee Program. All fees paid to Byrne Financial for wealth management services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. Additionally, account activity fees, such as electronic funds and wire transfers fees, certificate delivery fees, markups and markdowns, bid-ask spreads, selling concessions, and other miscellaneous fees and expenses as outlined in the account opening paperwork executed with the Custodian, are generally charged to the Client. Clients are encouraged to refer to the account opening paperwork executed with the Custodian for an outline of all third party fees not covered under this Wrap Fee Program. The Advisor does not control nor share in these fees.

The Advisor encourages Clients to review the fees charged by the fund[s], third parties and the fees charged by Byrne Financial to fully understand the total fees to be paid. Please see Item 5.C. – Other Fees and Expenses of the Disclosure Brochure.

#### Compensation

Byrne Financial is the sponsor and portfolio manager of this Wrap Fee Program. Byrne Financial receives wealth management fees paid by Clients for wealth management services covered under this Wrap Fee Program.

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

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Byrne Financial offers wealth management services to individuals, high net worth individuals, trusts, estates, charitable organizations and other businesses. Byrne Financial generally does not impose a minimum size for establishing a relationship. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

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

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#### Portfolio Manager Selection

Byrne Financial serves as sponsor and as portfolio manager for the services under this Wrap Fee Program. The Advisor also serves as the sponsor in conjunction with Independent Managers for the Wrap Fee Program.

The Advisor may recommend that a Client utilize an Independent Manager for all or a portion of a Client's investment portfolio. The Advisor will assist in the development of the initial policy recommendations and managing the ongoing Client relationship. The Advisor will also perform initial and ongoing oversight and due diligence over the selected Independent Managers to ensure the Independent Managers' strategies and target allocations remain aligned with its Clients' investment objectives and overall best interests.

#### Related Persons

Byrne Financial's Supervised Persons serve as portfolio managers for services under this Wrap Fee Program. Byrne Financial does not act as portfolio manager for any third-party wrap fee programs.

#### Supervised Persons

As noted above, Supervised Persons serve as a portfolio manager for the Wrap Fee Program. Please refer to the complete Disclosure Brochure for details on the services provided by Byrne Financial and the Brochure Supplement for the background of the Supervised Persons of Byrne Financial.

#### Performance-Based Fees

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

Byrne Financial 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.

#### Methods of Analysis

Please see Item 8 of the Disclosure Brochure for details on the research and analysis methods employed by the Advisor.

#### Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Byrne Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account[s]. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

#### Voting Client Securities

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

### **Item 7 – Client Information Provided to Portfolio Managers**

Clients participating in the Wrap Fee Program generally grant Byrne Financial the authority to discuss certain non-public information with Independent Managers engaged to manage their account[s]. Depending upon the specific arrangement, the Advisor is authorized to disclose various personal information including, without limitation: names, phone numbers, addresses, social security numbers, tax identification numbers and account numbers. Byrne Financial may also share certain information related to its Clients' financial positions and investment objectives in an effort to ensure that the Independent Managers' investment decisions remain aligned with its Clients' best interests. This information is communicated on an initial and ongoing basis, or as otherwise necessary to the management of its Clients' portfolios.



## **Item 8 – Client Contact with Portfolio Managers**

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There are no restrictions on Clients' ability to correspond with Byrne Financial. Clients can generally contact the Independent Managers managing their portfolios through Byrne Financial by providing the Advisor with written request and identification of the questions or issues to be discussed with the Independent Managers. After receiving the Client's written request, Byrne Financial, at its sole discretion, may contact the Independent Managers for the Client or arrange for the Independent Managers and the Client to communicate directly.

## **Item 9 – Additional Information**

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### Disciplinary Information

Byrne Financial values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider with whom the Client engages. The backgrounds of the Advisor and its Advisory Persons are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 167893. Please see Item 9 of the Disclosure Brochure as well as Item 3 of each Advisory Person's Brochure Supplement for additional information on how to research the background of the Advisor and its Advisory Persons.

### Other Financial Activities and Affiliations

Please see Items 10 and 14 of the Disclosure Brochure as well as Items 4 and 5 of each Advisory Person's Brochure Supplement.

### Code of Ethics, Review of Accounts, Client Referrals, and Financial Information

Byrne Financial has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Byrne Financial's compliance program ("Supervised Persons"). Complete details on the Byrne Financial Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading of the Disclosure Brochure.

### Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Janet Pultz, Chief Compliance Officer of Byrne Financial. Please see Item 13 of the Disclosure Brochure.

### Other Compensation

#### Participation in Institutional Advisor Platform

Byrne Financial has established an institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor may receive the following benefits from LPL Financial: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### Compensation for Client Referrals

Byrne Financial does not compensate, either directly or indirectly, any persons who are not supervised persons, for Client referrals.

#### Financial Information

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



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Joseph G. Byrne, AAMS®  
Owner and Chief Executive Officer**

**Effective: March 27, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Joseph G. Byrne, AAMS® (CRD# 1901015) in addition to the information contained in the Byrne Financial Freedom, LLC (“Byrne Financial” or the “Advisor”, CRD# 167893) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Byrne Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (508) 528-9366.

Additional information about Mr. Byrne 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# 1901015.

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**Byrne Financial Freedom, LLC**  
11 East Street, Franklin, MA 02038  
Phone: (508) 528-9366 \* Fax: (508) 528-9369  
<http://www.byrnefinancialfreedom.com>

## Item 2 – Educational Background and Business Experience

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Joseph G. Byrne, AAMS® born in 1959, is the Owner and Chief Executive Officer of Byrne Financial. Mr. Byrne earned a Bachelor of Science in Accounting from Arizona State University in 1982. Additional information regarding Mr. Byrne's employment history is included below.

### Employment History:

Owner and Chief Executive Officer Byrne Financial Freedom, LLC	02/2006 to Present
Registered Representative, LPL Financial LLC	02/2006 to Present
Financial Advisor, Advest, Inc. (Merryl Lynch, Pierce, Fenner & Smith, Incorporated – 11/2005 – 02/2006)	06/2002 to 02/2006

### Accredited Asset Management Specialist™ (“AAMS®”)

Individuals who hold the AAMS® designation have completed a course of study encompassing investments, insurance, tax, retirement, and estate planning issues. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Byrne.*** Mr. Byrne 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. Byrne.

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. Byrne.***

However, the Advisor does encourage you to independently view the background of Mr. Byrne on the 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# 1901015.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Byrne is also a registered representative of LPL Financial LLC (“LPL Financial”). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Byrne's separate capacity as a registered representative, Mr. Byrne will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Byrne. Neither the Advisor nor Mr. Byrne will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Byrne's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Byrne is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Byrne's role with Byrne Financial. As an insurance professional, Mr. Byrne will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Byrne is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a

conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Byrne or the Advisor.

#### Real Estate

Mr. Byrne owns and manages a rental property. Mr. Byrne does not offer the rental property to any clients. Mr. Byrne spends less than 10% of his time managing the property.

### **Item 5 – Additional Compensation**

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

### **Item 6 – Supervision**

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Mr. Byrne serves as the Owner and Chief Executive Officer of Byrne Financial and is supervised by Janet Pultz, the Chief Compliance Officer. Ms. Pultz can be reached at (508) 528-9366.

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



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Christopher R. Byrne  
Proactive Wealth Advisor**

**Effective: March 27, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Christopher R. Byrne (CRD# 6686125) in addition to the information contained in the Byrne Financial Freedom, LLC (“Byrne Financial” or the “Advisor”, CRD# 167893) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Byrne Financial Disclosure Brochure or this Brochure Supplement, please contact us at 508-528-9366.

Additional information about Mr. Byrne 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# 6686125.

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<http://www.byrnefinancialfreedom.com>



## Item 2 – Educational Background and Business Experience

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Christopher R. Byrne, born in 1993, is dedicated to advising Clients of Byrne Financial as a Proactive Wealth Advisor. Mr. Byrne earned a Bachelor's Degree in Economics from Arizona State University in 2016. Additional information regarding Mr. Byrne's employment history is included below.

### Employment History:

Proactive Wealth Advisor, Byrne Financial Freedom, LLC	11/2021 to Present
Relationship Manager, Byrne Financial Freedom, LLC	08/2019 to 11/2021
Registered Representative, LPL Financial LLC	08/2019 to Present
Registered Person, The Vanguard Group, Inc	07/2016 to 07/2019
Junior Investment Analyst, Byrne Financial Freedom, LLC	01/2011 to 06/2016

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Byrne.*** Mr. Byrne 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. Byrne.

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. Byrne.***

However, we do encourage you to independently view the background of Mr. Byrne on the 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# 6686125.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Byrne is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Byrne's separate capacity as a registered representative, Mr. Byrne will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Byrne. Neither the Advisor nor Mr. Byrne will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Byrne's separate capacity as a registered representative. Mr. Byrne spends approximately 90% of his time per month in his role as a registered representative of LPL Financial.

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Byrne serves as a Proactive Wealth Advisor of Byrne Financial and is supervised by Janet Pultz, the Chief Compliance Officer. Ms. Pultz can be reached at (508) 528-9366.

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



## **Form ADV Part 2B – Brochure Supplement**

**for**

**J. Gary Walsh  
Comprehensive Wealth Advisor**

**Effective: March 27, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of J. Gary Walsh (CRD# 844662) in addition to the information contained in the Byrne Financial Freedom, LLC (“Byrne Financial” or the “Advisor”, CRD# 167893) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Byrne Financial Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (508) 528-9366.

Additional information about Mr. Walsh 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# 844662.

## Item 2 – Educational Background and Business Experience

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J. Gary Walsh, born in 1953, is a Comprehensive Wealth Advisor of Byrne Financial. Mr. Walsh earned a BS in Business Administration with a concentration in Accounting from Boston University in 1979. Additional information regarding Mr. Walsh's employment history is included below.

### Employment History:

Comprehensive Wealth Advisor, Byrne Financial Freedom, LLC	10/2007 to Present
Registered Representative, LPL Financial LLC	10/2007 to Present
Financial Advisor, Bear Stearns & Co	07/2005 to 08/2007

## Item 3 – Disciplinary Information

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

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. Walsh.***

However, the Advisor does encourage you to independently view the background of Mr. Walsh on the 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# 844662.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Walsh is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Walsh's separate capacity as a registered representative, Mr. Walsh will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Walsh. Neither the Advisor nor Mr. Walsh will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Walsh's separate capacity as a registered representative.

### Insurance Agency Affiliations

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

## Item 5 – Additional Compensation

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

## Item 6 – Supervision

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Mr. Walsh serves as a Comprehensive Wealth Advisor of Byrne Financial and is supervised by Janet Pultz, the Chief Compliance Officer. Ms. Pultz can be reached at (508) 528-9366.

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



## **Form ADV Part 2B – Brochure Supplement**

**for**

**Jason S. Weiss  
Proactive Wealth Advisor**

**Effective: March 27, 2023**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Jason S. Weiss (CRD# 5759562) in addition to the information contained in the Byrne Financial Freedom, LLC (CRD# 167893) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Byrne Financial Freedom, LLC Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (508) 528-9366.

Additional information about Mr. Weiss 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# 5759562.

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## Item 2 – Educational Background and Business Experience

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Jason S. Weiss, born in 1983, is a Proactive Wealth Advisor of Byrne Financial Freedom, LLC. Mr. Weiss earned a B.S. in Business Administration from Bryant University in 2005. Additional information regarding Mr. Weiss's employment history is included below.

### Employment History:

Proactive Wealth Advisor, Byrne Financial Freedom, LLC	12/2016 to Present
Registered Representative, LPL Financial LLC	12/2016 to Present
Registered Representative, Santander Securities LLC	09/2012 to 12/2016
Assistant Branch Manager, Sovereign Bank	09/2009 to 09/2012
Registered Representative, LPL Financial Services	02/2010 to 09/2012
Personal Banker, Citibank, N.A.	04/2008 to 09/2009

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Weiss.*** Mr. Weiss 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. Weiss.

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. Weiss.***

However, the Advisor does encourage you to independently view the background of Mr. Weiss on the 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# 5759562.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Weiss is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Weiss's separate capacity as a registered representative, Mr. Weiss will receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Weiss. Neither the Advisor nor Mr. Weiss will earn ongoing investment advisory fees in connection with any products or services implemented in Mr. Weiss's separate capacity as a registered representative.

### Insurance Agency Affiliations

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

## Item 5 – Additional Compensation

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

## **Item 6 – Supervision**

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Mr. Weiss serves as a Proactive Wealth Advisor of Byrne Financial Freedom, LLC and is supervised by Janet Pultz, the Chief Compliance Officer. Ms. Pultz can be reached at (508) 528-9366.

Byrne Financial has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Byrne Financial Freedom, LLC. Further, Byrne Financial is subject to regulatory oversight by various agencies. These agencies require registration by Byrne Financial and its Supervised Persons. As a registered entity, Byrne Financial is subject to examinations by regulators, which may be announced or unannounced. Byrne Financial 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 27, 2023

### Our Commitment to You

Byrne Financial Freedom, LLC ("Byrne Financial" 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. Byrne Financial (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.

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

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

### Why you need to know?

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

### What information do we collect from you?

Social security or taxpayer identification number	Date of birth
Name, address and phone number[s]	Assets and liabilities
E-mail address[es]	Income and expenses
Account information (including other institutions)	Investment activity
	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, 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; and responding to regulators or legal investigations. Byrne Financial shares Client information with LPL Financial due to the oversight LPL Financial has over certain supervised persons of the Advisor. You may also contact us at any time for a copy of the LPL Financial Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Byrne Financial 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 Byrne Financial 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> Byrne Financial 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. We may disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account.
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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 (508) 528-9366.