

**FORM ADV PART 2A
DISCLOSURE BROCHURE**

LPF Advisors, LLC

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October 27, 2023

This brochure provides information about the qualifications and business practices of LPF Advisors, LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 941-907-0101. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

**ADDITIONAL INFORMATION ABOUT LPF ADVISORS, LLC (CRD #298068)
IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV**

Item 2: Material Changes

Annual Update

Regulatory rules require that we provide a summary of any material changes to this Brochure and any subsequent Brochures within 120 days of the close of our business's fiscal year. In addition, we will provide other ongoing disclosure information about material changes or an updated brochure when necessary.

Material Changes since the Last Update

Investment Advisers are required to prepare a disclosure document ("Brochure") that describes the firm and its business practices. Pursuant to SEC and/or state regulations, we are required to update our Brochure at least annually and provide you with a summary of any material changes since the previous annual amendment. We have prepared this amended Brochure following material changes since our last filing on September 22, 2023 are as follows:

- The cover page has been updated to disclose our current office address in Tampa, Florida.
 - The term "Solicitor" has been updated to "Referring Party" or "Referral."
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Full Brochure Available

To request a copy of the Firm Brochure contact Debbie Bectal, CCO at dabectal@lpfadvisors.com or 941-907-0101.

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Item 4: Advisory Business

Firm Description

LPF Advisors, LLC ("LPF") was founded in 2005 and became registered to offer investment advisory services in 2019. Kristopher Flammang and Mark Picchi are co-owners. Debbie Bectal is the Chief Compliance Officer.

We have a fiduciary duty to exercise good faith and act solely in the best interest of clients. We maintain policies and procedures, including a Code of Ethics which requires the interests of clients be placed ahead of our interests. Our Fiduciary Duty applies to all types of accounts that we manage.

Adam Carter, DBA Waypoint Advisors is affiliated with LPF Advisors, LLC as an Investment Advisor Representative (IAR). He is also a Registered Representative of Securities America, Inc., Broker/Dealer. He pays fees to LPF for administrative and compliance service.

Waypoint Advisors, is an affiliate of LPF therefore under the same supervision and policies of LPF.

Types of Advisory Services

ASSET MANAGEMENT

LPF offers discretionary and non-discretionary asset management services to advisory Clients. LPF will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors.

Discretionary

When the Client provides LPF discretionary authority the Client will sign a limited trading authorization or equivalent. LPF will have the authority to execute transactions in the account without seeking Client approval on each transaction.

Non-Discretionary

When the Client elects to use LPF on a non-discretionary basis, LPF/WP will determine the securities to be bought or sold and the amount of the securities to be bought or sold. However, LPF will obtain prior Client approval on each and every transaction before executing any transaction.

When deemed appropriate for the Client, LPF may hire Sub-Advisors to manage all or a portion of the assets in the Client account. LPF has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and LPF. Sub-Advisors execute trades on behalf of LPF in Client accounts. LPF will be responsible for the overall direct relationship with the Client. LPF retains the authority to terminate the Sub-Advisor relationship at LPF's discretion.

THIRD PARTY MONEY MANAGERS

When deemed appropriate for the Client, LPF may refer you to a third-party investment adviser for your investments. LPF will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

If LPF recommends a third-party investment advisor to you, a complete description of that advisor's services, fee schedules and account minimums is provided in that advisor's Form ADV Disclosure Brochure or Wrap Fee Program Brochure. The third-party advisor manages your accounts in accordance with the disclosures in those brochures, and copies of the brochures are provided to you when we initially recommend the advisor.

ERISA PLAN SERVICES

LPF provides service to qualified retirement plans including 401(k) plans, 403(b) plans, pension and profit-sharing plans, cash balance plans, and deferred compensation plans as a 3(21) advisor:

Limited Scope ERISA 3(21) Fiduciary. LPF may serve as a limited scope ERISA 3(21) fiduciary that can advise, help and assist plan sponsors with their investment decisions. As an investment advisor LPF has a fiduciary duty to act in the best interest of the Client. The plan sponsor is still ultimately responsible for the decisions made in their plan, though using LPF can help the plan sponsor delegate liability by following a diligent process.

1. Fiduciary Services are:

- Provide investment advice to the Client about asset classes and investment options available for the Plan in accordance with the Plan's investment policies and objectives. Client will make the final decision regarding the initial selection, retention, removal and addition of investment options. LPF acknowledges that it is a fiduciary as defined in ERISA section 3 (21) (A) (ii).
- Assist the Client in the development of an investment policy statement ("IPS"). The IPS establishes the investment policies and objectives for the Plan. Client shall have the ultimate responsibility and authority to establish such policies and objectives and to adopt and amend the IPS.
- Provide investment advice to the Plan Sponsor with respect to the selection of a qualified default investment option for participants who are automatically enrolled in the Plan or who have otherwise failed to make investment elections. The Client retains the sole responsibility to provide all notices to the Plan participants required under ERISA Section 404(c) (5) and 404(a)-5.
- Assist in monitoring investment options by preparing periodic investment reports that document investment performance, consistency of fund management and conformance to the guidelines set forth in the IPS and make recommendations to maintain, remove or replace investment options.
- Meet with Client on a periodic basis to discuss the reports and the investment recommendations.

2. Non-fiduciary Services are:

- Assist in the education of Plan participants about general investment information and the investment options available to them under the Plan. Client understands LPF's assistance in education of the Plan participants shall be consistent with and within the scope of the Department of Labor's definition of investment education (Department of Labor Interpretive Bulletin 96-1). As such, LPF is not providing fiduciary advice as defined by ERISA 3(21)(A)(ii) to the Plan participants. LPF will not provide investment advice concerning the prudence of any investment option or

combination of investment options for a particular participant or beneficiary under the Plan.

- Assist in the group enrollment meetings designed to increase retirement plan participation among the employees and investment and financial understanding by the employees.

LPF may provide these services or, alternatively, may arrange for the Plan's other providers to offer these services, as agreed upon between LPF and Client.

3. LPF has no responsibility to provide services related to the following types of assets ("Excluded Assets"):

- Employer securities;
- Real estate (except for real estate funds or publicly traded REITs);
- Stock brokerage accounts or mutual fund windows;
- Participant loans;
- Non-publicly traded partnership interests;
- Other non-publicly traded securities or property (other than collective trusts and similar vehicles); or
- Other hard-to-value or illiquid securities or property.

Excluded Assets will **not** be included in the calculation of Fees paid to LPF on the ERISA Agreement. Specific services will be outlined in detail to each plan in the 408(b)2 disclosure.

FINANCIAL PLANNING AND CONSULTING

LPF offers three different services, a full financial plan, hourly consultation services, and ongoing financial planning as outlined below.

Full Financial Plan

Financial planning services include a comprehensive evaluation of an investor's current and future financial state and will be provided by using currently known variables to predict future cash flows, asset values and withdrawal plans. LPF will use current net worth, tax liabilities, asset allocation, and future retirement and estate plans in developing financial plans.

Typical topics reviewed in a financial plan may include but are not limited to:

- **Risk Management and Protection:** Review existing policies, life insurance needs analysis, disability income protection, long term care evaluation, and Medicare/health insurance.
- **Investment Management:** Portfolio review, risk assessment and time horizon, asset allocation development, investment and manager selection, portfolio re-balancing, and monitoring and behavioral guidance.
- **Retirement and Income Planning:** Feasibility analysis and projections, cash flow analysis, income distribution strategies, social security and pension claiming, employer and self-employed plans, transfer and rollover options, RMDs and withdrawal advice, and debt management.
- **Family, Estate, and Taxes:** Education funding, core estate documents and trusts, advisor directed trust services, gifting and charitable giving, elder care and special needs, taxes in retirement, Roth conversions, tax efficient investing, and estate administration.

- **Comprehensive Services:** Financial education, account aggregation, formal financial planning, and coordinate other professionals.
- **Business Owner Specific:** Continuation, exit, succession, risk management, and other.

Hourly Consultation Services

This service is appropriate for clients who need assistance with individual topics. This is not a detailed financial review and will not provide/result in a comprehensive financial plan. Client may select individual topics above, or other topics as may be deemed appropriate. The individual topics that will be included in this service will be outlined and agreed upon on the financial planning and consulting agreement.

If a conflict of interest exists between the interests of LPF and the interests of the Client, the Client is under no obligation to act upon LPF's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through LPF. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

Ongoing Financial Planning Services

Clients that participate in on-going financial planning can expect the following:

- Up to four meetings per year depending on Client preference.
- Update of financial plan.
- Address any ongoing changes and/or issues.
- Review assets held outside of LPF.
- Ongoing check-ins via phone or email for accountability, encouragement and to address changes along the way.
- Initial recommendations are completed and delivered within thirty (30) days, contingent upon timely delivery of all required documentation.

If a conflict of interest exists between the interests of LPF and the interests of the Client, the Client is under no obligation to act upon LPF's recommendation. If the Client elects to act on any of the recommendations, the Client is under no obligation to effect the transaction through LPF. Financial plans will be completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation.

Depending on the level of services requested, your IAR can prepare a written report. Implementing any recommendation may require you to work closely with your attorney, accountant and/or insurance agent. Implementation is entirely at your discretion. Your IAR may also advise on non-securities matters. Generally, this is in connection with rendering estate planning, college planning and insurance and/or annuity advice.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without written Client consent.

Wrap Fee Programs

LPF does not sponsor any wrap fee programs.

Client Assets under Management

As-of July 31, 2023, LPF had \$249,669,729 in discretionary Client assets under management and \$246,892 in non-discretionary Client assets under management.

Assets under Advisement

As of June 30, 2023, LPF had approximately \$265,700,640 in assets under advisement. Assets Under Advisement is where LPF provides advice or consultation, but LPF does not have discretionary authority or does not arrange or effectuate the transaction.

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

The specific manner in which fees are charged is established in a client's written agreement. However, the fees for our Services are described below.

ASSET MANAGEMENT*LPF Portfolios*

LPF offers direct asset management services to advisory Clients. LPF charges an annual investment advisory fee based on the total assets under management as follows:

Assets Under Management	Annual Fee
Up to \$499,000	1.25%
\$500,000 to \$999,999	1.05%
\$1,000,000 to \$1,999,999	0.85%
\$2,000,000 to \$2,999,999	0.65%
\$3,000,000 and up	0.45%

*Waypoint Advisors Customized Portfolios**

Assets Under Management	Annual Fee
Up to \$249,999	1.29%
\$250,000 to \$749,999	1.19%
\$750,000 to \$1,499,999	1.09%
\$1,500,000 to \$2,999,999	0.99%
\$3,000,000 and up	0.89%

*These portfolios are only intended for Waypoint Advisor clients.

The annual fee may be negotiable. Negotiating fees for clients include but are not limited to negotiating fees for family members, firm employees, client's business relationships, (e.g. additional accounts with LPF Financial Advisors). Accounts within the same household are combined for a reduced fee. Fees are billed monthly in arrears based on an average daily balance of the account for the previous month. The average balance for the fee calculation includes accrued interest and cash balances. If margin is utilized, the fees will be billed based on the gross asset value of the account. LPF considers cash an asset class. We manage cash to control downside risk for clients. The fee charged on an account could effectively be higher than the return on any asset class.

LPF calculates the closing market value using a third-party portfolio management system. We reconcile client accounts to their custodian/brokerage reports monthly. The portfolio management system's values may differ from the custodian's statement market value for

various reasons, including accounting methods (e.g. transactions posting on trade date versus settlement date) and pricing sources utilized.

The calculation for the average daily balance is based on the formula $(A/D) \times (F/P)$. Below is an example based on the LPF Portfolio fee schedule.

A = the sum of the daily balances in the billing period

D = number of days in the billing period

F = annual management fee

P = number of billing periods per year

Step 1: Based on monthly billing cycle: Calculate the average of the values of the Client's account over the course of the entire month to determine the average daily balance.

Day	Balance	Day	Balance	Day	Balance
1	\$587,654	11	\$587,664	21	\$587,677
2	\$587,999	12	\$588,009	22	\$588,022
3	\$600,021	13	\$600,031	23	\$600,044
4	\$601,187	14	\$601,197	24	\$601,210
5	\$599,862	15	\$599,872	25	\$599,885
6	\$599,884	16	\$599,894	26	\$599,907
7	\$587,135	17	\$587,145	27	\$587,158
8	\$597,635	18	\$597,645	28	\$597,658
9	\$602,587	19	\$602,597	29	\$602,610
10	\$599,358	20	\$599,368	30	\$599,381
Total of days 1-30				\$17,890,296	

Average daily balance
 $(\$17,890,296 (A)/30 (D)) = \$596,343.20$

Step 2: Calculate the annual fee: $\$596,343.20 \times 1.05\% (F) = \$6,261.60$

Step 3: Determine the monthly fee: $\$6,261.60/12 (P) = \521.80

Lower fees for comparable services may be available from other sources. Fees for asset management services are deducted from a designated Client account to facilitate billing. Please see Item 15 for more information regarding direct deduction of fees from client's accounts.

LPF may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. LPF will enter into Sub-Advisor agreements with other registered investment advisor firms. When using sub-advisors, the client will pay additional fees depending on the account value, investment style and types of securities used. The sub-advisor fees will be disclosed to and acknowledged by the client in LPF's Investment Advisory Agreement. The sub-advisor's fees and the custodian's fees are not included in the fees charged by LPF.

Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by LPF with twenty one (21) days written

notice to Client and by the Client at any time with notice to LPF. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to LPF.

Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occur. The increase of fees will be done with the next billing cycle after we received your signed agreement..

THIRD PARTY MANAGERS

LPF will receive its standard fee, as outlined above, on top of the fee paid to the third-party adviser. This relationship will be memorialized in each contract between LPF and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

LPF is compensated by the money managers through referral or advisory fees. You should be aware the referral or advisory fees paid to LPF differ among recommended managers and programs.

Fees can be negotiated but generally range from .10% to 3 % annually, depending upon the program selected, the size of the account and the services covered. Under some programs, an inclusive fee covers account management, brokerage, clearance, custody and administrative services. In other programs, the account can be charged separately for such services. The amount of the fees, services provided, payment structure, termination provisions and other aspects of each program are detailed and disclosed in the third-party investment advisor's Form ADV, the wrap fee disclosure brochure and/or other applicable disclosure documents such as the disclosure documents of the managers selected and the account opening documents. LPF shares in a portion of the fee charged by the third-party money manager. The shared portion varies from program to program. You can request the shared amount from us, and we will provide that information to you.

ERISA PLAN SERVICES

The annual fees are based on the market value of the Included Assets and will not exceed 1%. The annual fee is negotiable and will be charged as a percentage of the Included Assets. Fees may be charged quarterly or monthly in arrears or in advance based on the assets as calculated by the custodian or record keeper of the Included Assets (without adjustments for anticipated withdrawals by Plan participants or other anticipated or scheduled transfers or distribution of assets). If the services to be provided start any time other than the first day of a quarter or month, the fee will be prorated based on the number of days remaining in the quarter or month. If this Agreement is terminated prior to the end of the billing cycle, LPF shall be entitled to a prorated fee based on the number of days during the fee period services were provided or Client will be due a prorated refund of fees for days services were not provided in the billing cycle.

The fee schedule, which includes compensation of LPF for the services is described in detail in Schedule A of the ERISA Plan Agreement. The Plan is obligated to pay the fees, however the Plan Sponsor may elect to pay the fees. Client may elect to be billed directly or have fees deducted from Plan Assets. LPF does not reasonably expect to receive any additional compensation, directly or indirectly, for its services under this Agreement. If additional compensation is received, LPF will disclose this compensation, the services rendered, and the payer of compensation. LPF will offset the compensation against the fees agreed upon under the Agreement.

FINANCIAL PLANNING AND CONSULTING

LPF charges either an hourly fee or fixed fee based on complexity and unique Client needs for financial planning. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered inside of thirty (30) days contingent upon timely delivery of all required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to LPF.

Full Financial Plan

Full Financial Plan services are offered on a fixed fee basis ranging from \$2500 to \$10,000.

Hourly Consultation Services

Hourly Consultation Services are offered based on an hourly fee of \$150 - \$300 per hour.

Fees for financial plans are:

Due upon delivery of the completed plan.

Clients can choose to pay for financial planning via the following methods:

- Check – to be remitted by Client to LPF
- Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. LPF will not have continuous access to the Client's banking information.)

Ongoing Financial Planning Services

Fees for ongoing financial planning services will range from \$1,500 - \$10,000 annually and will be paid on a monthly, quarterly, semi-annual or annual basis. The client will select the billing frequency on the financial planning agreement. Fees will be required to be remitted to LPF within 10 days of receipt of invoice.

Client may cancel within five (5) business days of signing Agreement with no obligation and without penalty. If the Client cancels after five (5) business days, any unpaid earned fees will be due to LPF.

Clients can choose to pay for financial planning via the following methods:

- Check – to be remitted by Client to LPF
- Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. LPF will not have continuous access to the Client's banking information.)

Client Payment of Fees

Fees for asset management services are:

- Deducted from a designated Client account. The Client must consent in advance to direct debiting of their investment account.

Fees for ERISA services will either be deducted from Plan assets or paid directly to LPF. The Client must consent in advance to direct debiting of their investment account.

Fees for financial plans will be billed:

- Check – to be remitted by Client to LPF
- Electronic Payment via ACH, Debit Card, or Credit Card (fees will be paid via a third party payment processor in which the client will securely input payment information and pay the advisory fee through a secure portal. LPF will not have continuous access to the Client's banking information.)

Alternatively, fees for asset management services provided by some TPMs are deducted from a designated Client account by TPM to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Margin interest may also apply for Client electing to utilize margin on their account(s). LPF does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to LPF. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

LPF does not require any prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Fees for ERISA 3(21) services may be billed in advance.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to LPF.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of LPF receive external compensation for the sale of securities to clients as a registered representative of Securities America, Inc., a broker-dealer. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. As registered representatives, they do not charge advisory fees for the services offered through Securities America, Inc..

Investment Advisor Representatives of LPF receive external compensation from sales of investment related products such as insurance as licensed insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. These services and the investment recommended may be found at other institutions at a lower advisor fee, and other lower commissions, and other fees.

These conflicts are mitigated by disclosures, procedures, and LPF's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another registered representative or insurance agent of their choosing.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

LPF does not use a performance-based fee structure because of the conflict of interest. Performance based compensation may create an incentive for LPF to recommend an investment that may carry a higher degree of risk to the Client.

Item 7: Types of Clients

Description

LPF generally provides investment advice to individuals. Client relationships vary in scope and length of service.

Account Minimums

LPF requires a minimum of \$100,000 to open an account. In certain instances, the minimum account size may be lowered or waived. In addition, third-party money manager programs utilized by LPF may have minimum requirements to open an account. These are described in more detail in the third-party money managers' disclosure brochure.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting, cyclical analysis, Modern Portfolio Theory. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Modern Portfolio Theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

TPMs utilized by LPF may use various methods of analysis to determine the proper strategy for the client referred and these will be disclosed in the TPM's Form ADV Part 2. Investing in securities involves risk of loss that clients should be prepared to bear. Past performance is not a guarantee of future returns. Other strategies utilized by TPMs may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by notifying LPF. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Other strategies may include long-term purchases, short-term purchases investment strategies in our programs.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with LPF:

- *Market Risk:* The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.
- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.

- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a client invests in open end mutual funds or ETFs, the client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which client invests.
- *Foreign Securities Risk:* Funds in which clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intention of being held for more than one year. Typically, the expectation of the

investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.

- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment's return will not keep up with inflation.
- *Trading risk:* Investing involves risk, including possible loss of principal. There is no assurance that the investment objective of any fund or investment will be achieved.
- *Trading on Margin:* In a cash account, the risk is limited to the amount of money that has been invested. In a margin account, risk includes the amount of money invested plus the amount that has been loaned. As market conditions fluctuate, the value of marginable securities will also fluctuate, causing a change in the overall account balance and debt ratio. As a result, if the value of the securities held in a margin account depreciates, the client will be required to deposit additional cash or make full payment of the margin loan to bring account back up to maintenance levels. Clients who cannot comply with such a margin call may be sold out or bought in by the brokerage firm.
- *Foreign Investment Risk:* Investments in foreign securities may be riskier than U.S. investments because of factors such as, unstable international, political and economic conditions, currency fluctuations, foreign controls on investment and currency exchange, foreign governmental control of some issuers, potential confiscatory taxation or nationalization of companies by foreign governments, withholding taxes, a lack of adequate company information, less liquid and more volatile exchanges and/or markets, ineffective or detrimental government regulation, varying accounting standards, political or economic factors that may severely limit business activities, and legal systems or market practices that may permit inequitable treatment of minority and/or non-domestic investors. Investments in emerging markets may involve these and other significant risks such as less mature economic structures and less developed and more thinly-traded securities markets.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
 - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
 - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor's which is disclosed in the Sub-Advisor's Form ADV Part 2.

The risks associated with utilizing TPM's include:

- Manager Risk
 - TPM fails to execute the stated investment strategy

- Business Risk
 - TPM has financial or regulatory problems
- Cyber Risk
 - Cybersecurity: The technology systems of our firm and the relative service providers could be vulnerable to Inadvertent or deliberate interruption and consequent damage from technical or human sources. In addition to natural catastrophes, service/power outages, and network or telecommunication failures, security breaches and intrusion by unauthorized persons could result in damage, disruption, and theft of data, including investor information. We have implemented cybersecurity procedures meant to address these risks.
 - Nevertheless, given our fundamental dependence on technology, a cyber-attack or similar technology disruption could have a material adverse impact on Clients. Additionally, there are inherent limitations in cybersecurity policies and procedures and controls including the possibility that certain risks have not been identified. We have conducted limited due diligence and risk assessments of third-party providers. However, we are not able to control the cybersecurity plans, breach notifications, incident response plans and controls put in place by other services providers and/or the issuers in which the client invests.
 - It is in the client's best interest to monitor all of their accounts on a regular basis and stay informed to cybersecurity best practices.

The specific risks associated with the portfolios of the TPM's which is disclosed in the TPM's Form ADV Part 2.

DOL Fiduciary Rule

Retirement Rollovers: If we recommend that you rollover your retirement plan, such as a 401K, 403B, etc., into an account we manage there is an inherent conflict of interest as we will be paid a fee and your fees will likely increase. When considering rolling over a 401K to an IRA we manage consider your options which generally include:

- Leave in the 401K plan if permitted
- Rollover to a new employer's plan if permitted
- Cash out the account value – depending on age may have adverse tax concerns

A few of the benefits of rolling over the 401K to an account we manage for you may include:

- Increased asset selection
- Alignment with your financial objectives
- Enhanced services
- Access to discretionary asset management
- A reduction of fee rates based on larger assets under management with us.

You are never under any obligation to rollover retirement plan assets to an account managed by us. We shall act in the capacity of a Fiduciary whenever we manage a retirement plan or recommend moving your retirement assets to a plan we manage.

Item 9: Disciplinary Information

Criminal or Civil Actions

LPF and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

LPF and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

LPF and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of LPF or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

LPF is not registered as a broker-dealer, however, Investment Advisor Representative of LPF are registered representatives of Securities America, Inc. (SAI), a FINRA/SIPC broker-dealer.

Futures or Commodity Registration

Neither LPF nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Kristopher Flammang has a financial affiliated business as an independent insurance agent. Less than 5% of his time is spent on this activity. Mr. Flammang is also a registered representative with Securities America, Inc. Approximately 10% of his time is spent in this activity. He will offer Clients services from those activities. As an insurance agent and registered representative, he may receive separate yet typical compensation.

Mark Picchi has a financial affiliated business as an independent insurance agent. Less than 5% of his time is spent on this activity. Mr. Picchi is also a registered representative with Securities America, Inc. Approximately 10% of his time is spent in this activity. He will offer Clients services from those activities. As an insurance agent and registered representative, he may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent or registered representative of their choosing.

In addition, Mr. Flammang is the trustee for Flammang Family Trust/2Fs Squared. This is not a conflict of interest as there are no crossover clients.

Finally, Mr. Picchi is a member of Walsh Pond LLC. This is not a conflict of interest as there are no crossover clients.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

LPF may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and LPF. Sub-Advisors execute all trades on behalf of LPF in Client accounts. LPF will be responsible for the overall direct relationship with the Client. LPF retains the authority to terminate the Sub-Advisor relationship at LPF's discretion.

In addition to the authority granted to LPF, Clients will grant LPF full discretionary authority and authorizes LPF to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to LPF in the Agreement. In addition, at LPF's discretion, LPF may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. LPF ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

LPF may at times utilize the services of third party money managers to manage client accounts. In such circumstances, Advisor will share in the third party asset management fee. Clients placed with TPM will be billed in accordance with the TPM's fee schedule which will be disclosed to the Client prior to signing an agreement. When referring Clients to a TPM, the Client's best interest will be the main determining factor of LPF. LPF ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

These practices represent conflicts of interest because LPF is paid a Referral Fee for recommending the TPM and may choose to recommend a particular TPM based on the fee LPF is to receive. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to act in the best interest of his Clients. Clients are not required to accept any recommendation of TPM given by LPF and have the option to receive investment advice through other money managers of their choosing.

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

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of LPF have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of LPF affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of LPF. The Code reflects LPF and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

LPF's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director

of LPF may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

LPF's Code is based on the guiding principle that the interests of the Client are our top priority. LPF's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

LPF will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

LPF and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

LPF and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide LPF with copies of their brokerage statements.

The Chief Compliance Officer of LPF is Debbie Bectal. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

LPF does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide LPF with copies of their brokerage statements.

The Chief Compliance Officer of LPF is Debbie Bectal. She reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

LPF will recommend the use of a particular broker-dealer based on their duty to seek best execution for the client, meaning they have an obligation to obtain the most favorable terms for a client under the circumstances. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is affected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. LPF will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. LPF relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by LPF. LPF does not receive any portion of the trading fees.

We have research, trading, and operational services afforded to you that are not available to retail investors. Other services that are provided by the broker/custodians that may not be available to the retail investor or are provided to us at a lower cost include:
provide access to client account data (such as trade confirmations and account statements)

- *Facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts)*
- *Provide research, pricing information, and other market data*
- *Facilitate payment of fees from our clients' accounts*
- *Assist with back-office support, recordkeeping, and client reporting*

LPF will recommend the use of Charles Schwab & Co., Inc.

- *Research and Other Soft Dollar Benefits*
Our firm maintains client accounts with certain custodians/broker-dealers for the execution and custody of our clients' securities. These custodians/broker-dealers provide various services to our firm, including research, trading platforms, technology, and compliance education. While we do not pay *soft dollars for these services, it is important to note that our firm may benefit from these relationships due to the efficiencies and cost savings they provide. This may create a conflict of interest, as we may have an incentive to recommend or continue utilizing the services of these custodians/broker-dealers based on the benefits received, rather than solely on the best interests of our clients. These benefits, such as access to research reports or specialized market data, are typically not available to retail clients.

Our firm believes that the services provided by these custodians/broker-dealers enhance our ability to serve our clients effectively. The research, trading platforms, technology, and compliance education offered by these firms can contribute to the quality and timeliness of our investment decisions and overall client service. However, it is important to note that the selection and recommendation of custodians/broker-dealers are based on factors such as their reputation, financial

stability, regulatory compliance, and the suitability of their services for our clients' needs. We prioritize our clients' best interests when making these decisions and regularly evaluate the services provided by our custodians/broker-dealers to ensure they continue to meet our clients' expectations.

LPF does not seek to proportionately allocate benefits to client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when LPF receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that LPF has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*
LPF does not receive client referrals from any custodian or third party in exchange for using that broker-dealer or third party.
- *Directed Brokerage*
LPF does not allow its clients to direct brokerage.
Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of client transactions as client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Aggregating Securities Transactions for Client Accounts

LPF is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of LPF. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Trade Errors

In the event a trading error occurs in a client account; our policy is to restore the account to the position it would have been in had the trading error not occurred. Depending on the circumstances, corrective actions include canceling the trade, adjusting an allocation, and/or reimbursing the account. We will never utilize any soft dollars to correct errors it makes while placing trades for a client's account. Accordingly, the firm does not allow trade errors to be corrected through soft dollar commissions. We will maintain appropriate records of trade errors.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Client accounts for LPF's advisory services are reviewed as needed, as required and as appropriate by LPF advisors and supervisors. The nature and timing of the reviews will vary by LPF. All accounts, on an ongoing basis, are reviewed at least annually by Debbie Bectal, CCO. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, and

suitability criteria and reviewing target allocations/portfolios to identify if there is an opportunity for rebalancing. Account reviews can be performed more frequently when market conditions dictate.

Our Investment Adviser Representatives will provide continuous management of the assets in the client portfolios based on market conditions, changes to the client's objectives or the performance of the assets.

Clients are encouraged to promptly contact us whenever your financial situation or investment objectives change.

Financial plans generated are updated as requested by the Client and pursuant to a new or amended agreement, LPF suggests updating at least annually.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information, and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly; however, custodians may generate monthly statements for managed accounts. Account statements are issued by LPF's custodian(s). Client receives confirmations of each transaction in account from custodian. LPF does not provide additional reports to Clients.

Clients should notify the firm or the custodian directly if they are not receiving custodial statements on at least a quarterly basis or if they have any other questions regarding the reports that are receiving.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

LPF receives additional economic benefits from external sources as described above in Item 12.

LPF receives a portion of the annual management fees collected by the TPM(s) to whom LPF refers Clients.

LPF can receive marketing override fees or premier sponsor fees from third-party money managers or program sponsors. If we do not receive marketing override fees or premier sponsor fees, then we can retain up to 10% of the representative's referral fees or advisory fees from those programs.

Investment Advisor Representatives of LPF receive external compensation for the sale of securities to Clients as registered representatives of Securities America, Inc., a broker-dealer. IARs of LPF can have an incentive to join and remain affiliated with Securities America, Inc. ('SAI'), a broker/dealer, through certain compensation arrangements that could include bonuses, enhanced pay-outs, forgivable loans, and/or business transition loans. Furthermore, there can be production goals associated with recommendation of transactions from your IAR. Receiving such compensation is considered a conflict of interest.

Advisory Firm Payments for Client Referrals

We are very appreciative of the clients that refer prospects to us. Out of that appreciation, we will provide nominal compensation in Gift Cards to our clients for the prospects that also become clients.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by LPF.

LPF is deemed to have limited custody because advisory fees are directly deducted from Client's accounts by the custodian on behalf of LPF.

LPF has SLOA custody, Standing Letter of Authorization, that gives LPF the ability to move money and change the amount and frequency, but we are not required to have an annual surprise audit by an unaffiliated CPA firm because the seven conditions are met.

LPF shall ensure the seven conditions are met so we do not have to have an annual surprise audit by a CPA firm:

1. The client will be required to provide a written instruction to the qualified custodian that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
2. The client will authorize LPF in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client's qualified custodian will perform appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and will provide a transfer of funds notice to the client promptly after each transfer.
4. The client will have the ability to terminate or change the instruction to the client's qualified custodian.
5. LPF will have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
6. LPF will maintain records showing that the third party is not a related party of LPF or located at the same address as LPF.
7. The client's qualified custodian will send the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Discretionary Authority for Trading

If applicable, Client will authorize LPF discretionary authority, via the advisory agreement, to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. If applicable, Client will authorize LPF discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. If however, consent for discretion is not given, LPF will obtain prior Client approval before executing each transaction.

The Discretionary Authority is also included in the custodian documentation.

LPF allows Clients to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to LPF in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. LPF does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

LPF does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, LPF will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because LPF does not serve as a custodian for Client funds or securities and LPF does not require prepayment of fees of more than \$1,200 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

LPF has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

LPF has not had any bankruptcy petitions in the last ten years.

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Kristopher Flammang, AIF®, CRPC®, BFA

LPF Advisors, LLC

Office Address:

2601 Cattlemen Road
Suite 302
Sarasota, FL 34232

Tel: 941-907-0101

Email: kflammang@lpfadvisors.com

Website: www.lpfadvisors.com

October 27, 2023

This brochure supplement provides information about Kristopher Flammang and supplements the LPF Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Kristopher Flammang if you did not receive the brochure or if you have any questions about the contents of this supplement.

**ADDITIONAL INFORMATION ABOUT KRISTOPHER FLAMMANG (CRD
#3189194) IS AVAILABLE ON THE SEC'S WEBSITE AT
WWW.ADVISERINFO.SEC.GOV.**

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Kristopher Flammang, AIF®, CRPC®, BFA

- Year of birth: 1974
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Item 2 - Educational Background and Business Experience

Educational Background:

- University of Nebraska; Psychology; Attended 1995-1997
- McCook Community College; General Studies; Attended 1993-1995

Business Experience:

- Flammang Family Trust/2Fs Squared; Trustee; 07/2022-Present
- LPF Advisors, LLC; Investment Advisor Representative; 04/2019-Present
- LPF Advisors, LLC; Managing Member; 10/2005-Present
- Securities America, Inc.; Registered Representative; 12/2004-Present
- Kris Flammang, Sole Proprietor; Insurance Agent; 12/2004-Present
- LPF Advisors, LLC; Chief Compliance Officer; 04/2019-12/2022
- Securities America Advisors, Inc.; Investment Advisor Representative; 01/2005-02/2020
- Series 7 - General Securities Representative Examination; 06/29/1999
- Series 66 - Uniform Combined State Law Examination; 04/04/2005
- SIE - Securities Industry Essentials Examination; 10/01/2018

Professional Certifications

Kristopher Flammang has earned certifications and credentials that are required to be explained in further detail.

Accredited Investment Fiduciary® (AIF®): Accredited Investment Fiduciary designation is awarded from the Center for Fiduciary Studies, LLC. AIF® certification requirements:

- Complete training curriculum.
- Pass the 60 questions AIF® exam with 75% correct answers.
- Sign and agree to abide by a Code of Ethics.
- Complete six hours of continuing professional education, four of which are fi360 Training CE.
- Maintain current contact information in fi360's designee database.
- Submit yearly renewal application with annual dues.

The Chartered Retirement Planning CounselorSM or (CRPC®): designation is awarded by the College for Financial Planning, candidates must:

- Complete a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire planning process using models and techniques from real Client situations.
- Pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations.

- Adhere to Standards of Professional Conduct and are subject to a disciplinary process.
- Renew every two years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

Behavioral Financial Advisor (BFA™): Behavioral Financial Advisor is a professional designation offered through a partnership between Kaplan Financial and Think2Perform. The BFA™ designation is a program designed to educate financial professionals on the core concepts of Behavioral Finance and its application with clients. BFA™ requirements:

- Completion of two courses related to behavioral finance as well as certification exam
- Course exams and final certification exam (online, timed, proctored)
- Complete 20 hours every two years of continuing education.

Item 3 - Disciplinary Information

- A. Mr. Flammang has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
 - a. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 - b. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 - c. Was found to have been involved in a violation of an investment-related statute or regulation; or
 - d. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Flammang never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
 - a. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 - b. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
 - a. (a) denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.
- C. Mr. Flammang has never been the subject of a self-regulatory organization (SRO) proceeding in which he:

- a. Was found to have caused an investment-related business to lose its authorization to do business; or
 - b. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Flammang has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.
-

Item 4 - Other Business Activities

Kristopher Flammang has a financial affiliated business as an independent insurance agent. Less than 5% of his time is spent on this activity. Mr. Flammang is also a registered representative with Securities America, Inc. Approximately 10% of his time is spent in this activity. He will offer Clients services from those activities. As an insurance agent and registered representative, he may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent or registered representative of their choosing.

In addition, Mr. Flammang is the trustee for Flammang Family Trust/2Fs Squared. This is not a conflict of interest as there are no crossover clients.

Item 5 - Additional Compensation

Mr. Flammang receives commissions on the insurance and broker dealer products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Debbie Bectal is the chief compliance officer of LPF. Debbie Bectal reviews Kris Flammang's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Debbie Bectal can be reached at dbectal@lpfadvisors.com or 941-907-0101.

Item 1 Cover Page

SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Mark Picchi

LPF Advisors, LLC

Office Address:

2601 Cattlemen Road
Suite 302
Sarasota, FL 34232

Tel: 941-907-0101

Email: mpicchi@lpfadvisors.com

Website: www.lpfadvisors.com

October 27, 2023

This brochure supplement provides information about Mark Picchi and supplements the LPF Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Mark Picchi if you did not receive the brochure or if you have any questions about the contents of this supplement.

ADDITIONAL INFORMATION ABOUT MARK PICCHI (CRD #2228311) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Mark Picchi

- Year of birth: 1966
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Item 2 - Educational Background and Business Experience

Educational Background:

- Massasoit College; Associates Degree - Engineering; 1991

Business Experience:

- Walsh Pond, LLC; Member; 03/2022-Present
 - LPF Advisors, LLC; Investment Advisor Representative; 04/2019-Present
 - LPF Advisors, LLC; Member; 10/2005-Present
 - Securities America, Inc.; Registered Representative; 12/2004-Present
 - Mark Picchi, Sole Proprietor; Insurance Agent; 10/2005-Present
 - Securities America Advisors, Inc.; Investment Advisor Representative; 01/2005-02/2020
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Item 3 - Disciplinary Information

- A. Mr. Picchi has never been involved in a criminal or civil action in a domestic, foreign or military court of competent jurisdiction for which he:
- a. Was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) misdemeanor that involved investments or an investment-related business, fraud, false statement or omissions, wrongful taking of property, bribery, perjury, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 - b. Is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 - c. Was found to have been involved in a violation of an investment-related statute or regulation; or
 - d. Was the subject of any order, judgement or decree permanently or temporarily enjoining, or otherwise limiting, him from engaging in any investment related activity, or from violating any investment-related statute, rule, or order.
- B. Mr. Picchi never had an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which he:
- a. Was found to have caused an investment-related business to lose its authorization to do business; or the subject of an order by the agency or authority;
 - b. Was found to have been involved in a violation of an investment-related statute or regulation or was the subject of an order by the agency or authority
 - a. (a)denying, suspending or revoking the authorization of the supervised person to act in an investment-related business; (b) barring or suspending his association with an investment-related business; (c) otherwise significantly

limiting his investment-related activities; or (d) imposing a civil money penalty of more than \$2,500 on him.

- C. Mr. Picchi has never been the subject of a self-regulatory organization (SRO) proceeding in which he:
- a. Was found to have caused an investment-related business to lose its authorization to do business; or
 - b. Was found to have been involved in a violation of the SRO's rules and was: (a) barred or suspended from membership or from association with other members, or was expelled from membership; (b) otherwise significantly limited from investment-related activities; or (c) fined more than \$2,500.
- D. Mr. Picchi has not been involved in any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct.

Item 4 - Other Business Activities

Mark Picchi has a financial affiliated business as an independent insurance agent. Less than 5% of his time is spent on this activity. Mr. Picchi is also a registered representative with Securities America, Inc. Approximately 10% of his time is spent in this activity. He will offer Clients services from those activities. As an insurance agent and registered representative, he may receive separate yet typical compensation.

These practices represent conflicts of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent or registered representative of their choosing.

Finally, Mr. Picchi is a member of Walsh Pond LLC. This is not a conflict of interest as there are no crossover clients.

Item 5 - Additional Compensation

Mr. Picchi receives commissions on the insurance and broker dealer products he sells. He does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is disclosed in Item 5 of Part 2A.

Item 6 - Supervision

Debbie Bectal is the chief compliance officer of LPF. Debbie Bectal reviews Mark Picchi's work through Client account reviews and quarterly personal transaction reports, as well as face-to-face and phone interactions. Debbie Bectal can be reached at dbectal@lpfadvisors.com or 941-907-0101.