



J Bradin Financial LLC

Firm CRD #317569

Form ADV Part 2a -Firm Brochure

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This brochure provides information about the qualifications and business practices of J Bradin Financial LLC ("JBF"). If you have any questions about the contents of this brochure, please contact us at 910-448-2884.

The information in this brochure has not been approved or verified by the North Carolina Securities Division. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about JBF is also available on the Internet at www.adviserinfo.sec.gov. You can find information about JBF on this website by searching for "J Bradin Financial LLC", or searching our CRD number, 317569.

Item 2 Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to our business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of JBF. The only advisor at JBF is Jesse Bradin, and all disclosures and information about JBF and Jesse Bradin are contained in ADV 2A. There is no ADV 2B for additional advisors.

Rule 18 NCAC 06A 1707 (b)(3) of the administrative rules which support the North Carolina Investment Advisers Act requires us to deliver to existing clients our entire Brochure annually.

There have been no material changes to the Disclosure Brochure since our initial filing dated March 2022.

Each year that we provide you investment advisory services, we will provide you with an updated Brochure within 120 days of our fiscal year end. Since our fiscal year ends on December 31, you will receive the updated Brochure no later than April 30 each year.

J Bradin Financial must amend the Brochure and deliver it to you promptly when information contained in the Brochure becomes materially inaccurate. We will send you an update Brochure within 30 days of the event that requires the filing of the amendment.

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Item 4 Advisory Business

A. Description of Advisor Firm

J Bradin Financial LL ("JBF") was formed in the state of North Carolina in October 2021 as a Limited Liability Company. JBF is registered as an investment advisor in the state of North Carolina. The owner of the firm is Jesse Bradin.

Throughout this Disclosure Brochure, you will see the words "I", "me", "my", "we", "us", "our", or "JBF". Where you see these words, the Brochure is describing products and services provided by JBF or Jesse.

Where you see the words "you" and "your", the Brochure describes our clients and prospective clients.

JBF offers financial planning, investment supervisory and investment management services to clients. For a more complete description see Item 4 B.

B. Description of Advisory Services Offered

Comprehensive Wealth Planning

JBF believes that a comprehensive approach to wealth planning covers 3 main areas: Estate Planning, Financial Planning, and Tax Planning. JBF does offer estate planning or tax planning consultations and data gathering services to facilitate the creation of an estate plan and a forward-looking tax plan utilizing outside services that offer our clients excellent value and needed expertise. It is not necessary for you to use these services to be our client.

- **Financial Plan:** A full fact-finding session(s) guides the process of defining goals, uncovering obstacles/risks, and developing a total retirement plan that focuses on secure retirement income, tax reduction, and investment risk management. We analyze Guaranteed Lifetime Income (GMI), and create an income strategy that fills in any income deficiencies. Your risk tolerance is assessed, and an investment portfolio is developed/selected that matches risk tolerance and goals. Assets managed by JPF are held at qualified custodians (Altruist or Interactive Brokers) or Insurance companies depending upon the asset class and investment plan. Our main goal is to develop and implement a financial plan that is designed to attain goals without undo risk and in the MOST cost effective manner possible.

- **Employer Plan Allocations:** JBF will offer allocation advice on employer plans like 401k and 403b. This advice will be limited to the plan investment options and the plans ability to offer RIA access to plan allocations.
- **Insurance Review and Placement:** We will review and conduct carrier phone calls with you to evaluate the benefits of any in-force life insurance policies. Only if you agree, and it is in your best interest, JBF may recommend exchange and or write new coverages. You are free to use any carrier or agent you want to place your insurance with.

Investment Supervisory and Management Services

Should the client elect to engage JBF for the implementation of the financial plan, we offer investment supervisory and management services based on your individual goals, objectives, time horizons, and risk tolerance. Once established, an Investment Policy Statement is created for each client, which outlines the client's current financial situation (age, income, tax levels, and risk tolerance). JBF evaluates your current investments and then constructs an investment plan and recommended portfolio that matches your specific situation. JBF requires discretionary authority from you in order to select securities, and the qualified custodian (or their affiliated broker/dealer) will execute transactions without your permission prior to each transaction.

You may engage JBF to manage and/or offer investment advice on certain investments that are not maintained at their primary custodian, such as assets held in employer sponsored retirement plans, and/or assets held in qualified tuition plans (e.g., 401(k)'s, 529 plans). In these situations, we direct or recommend the allocation of your assets among the various investment options available in each plan/custodian.

Our recommended portfolios generally consist of exchange-listed securities, securities traded over the counter, foreign issuers, warrants, corporate debt securities, certificate of deposit, municipal securities, Exchange Traded Funds (ETFs), mutual funds, United States government securities, variable life insurance, options contracts on securities, and REITs.

JBF provides Investment supervisory and management services under the terms of a written advisory agreement executed between you and JBF.

When deemed appropriate for the Client, J Bradin Financial, LLC may recommend that Clients utilize the services of a Third-Party Manager (“TPM”) to manage a portion of, or your entire portfolio. All TPMs that J Bradin Financial, LLC recommends must either be registered as investment advisers with the Securities and Exchange Commission or with the appropriate state authority(ies).

After gathering information about your financial situation and objectives, an investment advisor representative of our firm will make recommendations regarding the suitability of a TPM or investment style based on, but not limited to, your financial needs, investment goals, tolerance for risk, and investment objectives. Upon selection of a TPM, J Bradin Financial, LLC will monitor the performance of the TPM to ensure their performance and investment style remains aligned with your investment goals and objectives.

In such circumstances, J Bradin Financial, LLC receives solicitor fees from the TPM. We act as the liaison between the Client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We help the Client complete the necessary paperwork of the TPM and provide ongoing services to the Client. Ongoing services include but are not limited to:

1. Meet with the Client to discuss any changes in status, objectives, time horizon or suitability;
2. Update the TPM with any changes in Client status which is provided to J Bradin Financial, LLC by the Client;
3. Review the statements provided by the TPM; and
4. Deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the TPM to the Client.

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. This is detailed in Item 10 of this brochure.

Seminars/Workshops

We also offer educational seminars or workshops on topics including general information concerning investing, financial planning, business and tax planning, estate planning, as well as our services. JBF does **not** charge a fee for these seminars or workshops.

C. Clients Tailored Services and Client Imposed Restrictions

JBF tailors our advisory services to your individual needs based on meetings and conversations with you. If you wish to impose certain restrictions on investing in certain securities or types of securities, JBF will address such restrictions with you so that we have a clear understanding of your requirements. We try to accommodate reasonable restrictions wherever we can, but it is important to understand that the investment performance of an account that is restricted will not match the performance of our other client accounts.

If we recommend that your account follows a model portfolio constructed by a third-party, you must be aware that the model portfolio will not be tailored to you specifically. In this case you may not be able to impose restrictions on investing in certain securities or types of securities. We invite you to discuss any concerns you may have with any of the holdings in the model portfolios.

D. Assets Under Management

As of December 31, 2025, JBF had discretionary assets of \$8,613,754.58 and \$1,345,232.92 non-discretionary assets.

Item 5 Fees and Compensation

A. & B. Method of Compensation and Fee Schedule and Client Payment of Fees

Asset Management Fees for model portfolios held at Altruist or Interactive Brokers.

Pursuant to your investment advisory contract, JBF will charge a monthly management fee, payable in arrears, based on the value of portfolio assets of the account on the last business day of the preceding month.

The following table presents JBF's indicative asset management fee schedule for model portfolios held at Altruist or Interactive Brokers:

Assets Under Management	Annual fee
Up to \$250,000	1%
250,001 to \$500,000	.95%
\$500,001 to \$1,000,000	.90%
Over \$1,000,000	.85%

All asset management fees are negotiable. This fee is negotiated based on anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.

Asset management fees will be automatically deducted from your account on a monthly basis by the qualified custodian. We require you to give us written authorization permitting JBF to be paid directly from your account held by the custodian. The custodian will send a monthly statement to the client. Clients are encouraged to review the monthly statement and notify us of any discrepancies.

Lower fees for comparable service may be available from another provider.

THIRD PARTY MANAGERS

J Bradin Financial, LLC has entered into a Solicitor Agreement with Gradient Investments, LLC ("GI"). GI is a Registered Investment Advisor registered with the Securities and Exchange

Commission that provides investment portfolio advice and supervisory services. GI offers an actively managed program of mutual fund and stock portfolios. The fee will be disclosed to the Client in the Investment Advisory Agreement and are negotiable. The Clients fee for these services will be based on a percentage of assets under management as follows:

Fee Schedule per Account: Strategic Portfolios
Assets Valuation Maximum Annual

Advisory Fee Gradient Investments J Bradin Financial, LLC
Retention
All Assets 2.00% 1.00% 1.00%

Fee Schedule per Account: Tactical Portfolios
Assets Valuation Maximum Annual

Advisory Fee * Gradient Investments J Bradin Financial, LLC
Retention
All Assets 1.80% 0.80% 1.00%
Fee Schedule per Account: Allocation & Defined Outcome Portfolios
Assets Valuation Maximum Annual

Advisory Fee Gradient Investments J Bradin Financial, LLC
Retention
All Assets 1.70% 0.70% 1.00%

Fee Schedule per Account: Preservation Portfolios

Assets Valuation Maximum Annual

Advisory Fee Gradient Investments J Bradin Financial, LLC
Retention
All Assets 1.00% 0.40% 0.60%

Fee Schedule per Account: Client Directed Accounts

Assets Valuation Maximum Annual

Advisory Fee Gradient Investments J Bradin Financial, LLC
Retention
All Assets \$300 \$300 \$0

*Traditionally, GI's Tactical portfolio was billed at the same fee as the Strategic portfolios with a maximum annual fee of 2.00%. GI is the sub-advisor to the ETF that is held in the Tactical Portfolio and will receive an annual fee of 0.20% from the ETF provider. In light of this arrangement, GI has reduced its annual fee on the Tactical Portfolio by 0.20%. The end net fee collected by GI and paid by the Client, which includes the ETF fee discussed above, will remain the same. For example, a client investing \$100,000 in the GI Tactical portfolio prior to November 2022 would pay an annual

fee to GI of \$2,000 or $\$100,000 \times 2.00\% = \$2,000$. After November 2022, GI will collect 0.20% of assets (or \$200 on the same \$100,000 account) from the ETF provider for sub-advisory services which clients incur as an expense from holding the ETF. The same client will now pay GI a discounted annual fee of \$1,800 or $\$100,000 \times 1.80\% = \$1,800$. Overall, the client incurs the same \$2,000 annual fee (\$1,800 investment management fee plus \$200 ETF expense fee).

For Client Directed Accounts (CDA), GI will assist in the opening, closing and transferring of accounts. GI will not have discretion at any time on these accounts. Client is solely responsible for the assets held within the accounts and their values which could increase or decrease (potential loss of principal). GI will not execute trades in CDA accounts. GI exceptions will be made for withdrawals to client or assets transferred into a GI managed portfolio. GI will also provide performance reporting on these accounts and can furnish 3rd party analysis reports per the client's request. Similar services may be available through other sources for a lower fee.

These are flat fee schedules, the entire portfolio is charged the same asset management fee. Fee Calculation: (Quarter End Value x Annual Fee %) x (Days in Quarter/Days in Year) + \$15 Quarterly Service Fee*

* The \$15 Quarterly Service Fee is the technology fee charged per account or investment strategy for performance and other reporting. This fee is disclosed in our ADV Part 2A (Item 5: Fees and Compensation) and in our Investment Proposal and Contract (Schedule D: Schedule of Fees).

All management fees are withdrawn from the Client's account unless otherwise noted. GI will receive written authorization from the Client to deduct advisory fees from their account held by a qualified custodian. GI will pay J Bradin Financial, LLC their share of the fees. J Bradin Financial, LLC does not have access to deduct Client fees. Clients may terminate their account within five (5) business days of signing the investment advisory

agreement without penalty or obligation. After the initial 5 business days, the agreement may be terminated by GI with thirty (30) days written notice to Client and by the Client at any time with written notice to GI. For terminations after the initial five business days, GI will be entitled to a pro-rata fee for the days service was provided in the final quarter.

GI will pay J Bradin Financial, LLC their portion of the final fee. In addition, GI charges a \$15 service fee quarterly. Incentive Program - GI

In addition to the regular advisory fee, GI has instituted a long-term incentive arrangement by J Bradin Financial, LLC can share in GI's portion of the management fee. This does not change the cost to the Client; it is a sharing arrangement paid from GI's portion of the advisory fee. The incentive arrangement will be paid annually according to the following table:

J Bradin Financial, LLC
Quarterly AUM with GI
Participation rate in GI's fee

\$10,000,000	3.00%
\$25,000,000	10.00%
\$50,000,000	12.50%
\$75,000,000	15.00%

Once J Bradin Financial, LLC reaches and maintains the thresholds listed above, the participation rate applies to all of the AUM for the quarter.

To receive the incentive award, J Bradin Financial, LLC needs to meet two qualifications. First, the quarter end billable AUM must be above the threshold amounts specified. Second, J Bradin Financial, LLC must be an advisor "in good standing" with GI at the time the annual checks are issued. "In good standing" means the advisor is proactively placing assets with GI.

This relationship will be disclosed to the Client in each contract between <Your company name> and Third-Party Money Manager. J Bradin Financial, LLC does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third Party Investment Agreement. Client will initial J Bradin Financial, LLC Investment Advisory Agreement to acknowledge receipt of Third-Party fee Schedule and required documents including Form ADV Part 2 disclosures.

C. Additional Client Fees Charged

All fees paid to the Advisor for investment advisory services are separate and distinct from the expenses charged by third party portfolios and or managers offered through custodians and or employer plans.

As we describe in Item 4- Advisory Business, the financial models that we use to implement our portfolio management services use mutual funds and ETFs. These instruments have their own management fees and expenses which are different from our fees. Fees and expenses for these products, which can include mutual fund fees, custody fees and investment management fees, are paid by their shareholders. If we buy such an instrument for your account, you will become such a shareholder of the underlying mutual fund or ETF in your account. The sponsors of mutual funds and ETFs are required to produce a prospectus which details all the relevant fees and expenses for each product, and they must make them available free of charge to all shareholders. These prospectuses are available from the qualified custodian for your account, and we encourage you to review them to understand the fees and expenses associated with each mutual fund or ETF instrument in your account.

At no time will we accept or maintain custody of your funds or securities except for the authorized fee deduction described above. You are responsible for all custodial, securities and brokerage execution fees charged by the qualified custodian and executing broker-dealer. JBF's asset management fee is separate and distinct from the custodian and execution fees.

D. Advance Payment of Fees and Fee Refunds

Fees are only charged on a monthly basis in arrears. For this reason there are not fee refunds.

E. Accepted Compensation

JBF does not accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

I may recommend that you consider the purchase of an insurance product as part of your overall financial plan. If you decide to purchase an insurance product from me as part of the implementation of your financial plan, I will receive a commission for selling it to you. The commissions that I earn from these sales are paid to me by the underwriter of the policy, and they are usual and customary in the insurance marketplace. While JBF receives commissions from this form of sale, insurance assets are excluded from calculation of your Assets Under Management (AUM) fees.

This practice may create a conflict of interest, as it could create incentives to recommend investment products based on the compensation received, rather than on your need.

We will make it clear to you when and why we are recommending products that pay a commission rather than operate under an AUM structure. AUM compensation is not better or worse for the client as long as the client's best interests are being met in the most efficient and risk aligned manner. You are not required to purchase insurance products from me, and you may choose any independent insurance agent and insurance company to purchase such products if you wish.

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

JBF does not charge performance-based fees and therefore does not engage in side-by-side management.

Item 7 Types of Clients and Minimum Account Size

We offer our services to individuals, pension and profit-sharing plans, trusts, estates, or charitable organizations.

JBF's typical minimum account requirement for opening and maintaining an account is \$25,000, but we may negotiate to accept accounts with a lower value.

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

A. Methods of Analysis and Investment Strategies

For asset management clients, JBF utilizes fundamental, technical or cyclical analysis techniques in formulating investment advice or managing assets. For clients who are referred to a sub-advisor for management of their portfolio, that sub-advisor will have their own methods of analysis and investment strategies. Clients will be provided with the recommended sub- advisor's Brochure and are encouraged to read it in its entirety.

The descriptions of fundamental, technical or cyclical analysis are as follows:

Fundamental analysis of businesses involves analyzing its financial statements and health, its management and competitive advantages and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives; to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term) market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments fall in value to reflect the uncertainty surrounding future returns as compared with the recent past. The risks with this strategy are two-fold 1) the markets do not always repeat cyclical patterns and 2) if too many investors begin to implement this strategy, it changes the very cycles they are trying to take advantage of.

The investment strategies we will implement include long term purchases of securities held at least for one year; short term purchases for securities sold within a year; option writing, including covered options, uncovered options or spreading strategies.

Our asset management service requires you to invest in securities. ***Investing in securities involves risk of loss.*** Because past performance is not indicative of future results, you should never assume that the future performance of any specific investment or investment strategy will be profitable. You must be prepared to bear investment loss, including the loss of your original principal.

B. Investment Strategy and Method of Analysis Material Risks

The methods of analysis and investment strategies followed by JBF are utilized across all of our clients, as applicable. One method of analysis or investment strategy is not more significant than the other when we are considering your portfolio, risk tolerance, time horizon and individual goals. However, you should be aware that with any trading that occurs in your account, you will incur transaction and administrative costs.

C. Security Specific Material Risks

Every type of investment, including mutual funds, involves risk. Risk refers to the possibility that you will lose money (both principal and any earnings) or fail to make money on an investment. A fund's investment objective and its holdings are influential factors in determining how risky a fund is. Reading the prospectus will help you to understand the risk associated with that particular fund.

Generally speaking, risk and potential return are related. This is the risk/return trade-off. Higher risks are usually taken with the expectation of higher returns at the cost of increased volatility. An investment with higher risk has the potential for higher return, it also has the greater potential for losses or negative returns. The school of thought when investing suggests that the longer your investment time horizon is the less affected you should be by short-term volatility. Therefore, the shorter your investment time horizon, the more concerned you should be with short-term volatility and higher risk.

Below is a list of some of the risks to consider when investing:

Call Risk. The possibility that falling interest rates will cause a bond issuer to redeem—or call—its high- yielding bond before the bond's maturity date.

Country Risk. The possibility that political events (a war, national elections), financial problems (rising inflation, government default), or natural disasters (an earthquake, a poor harvest) will weaken a country's economy and cause investments in that country to decline.

Credit Risk. The possibility that a bond issuer will fail to repay interest and principal in a timely manner. Also called default risk.

Currency Risk. The possibility that returns could be reduced for Americans investing in foreign securities because of a rise in the value of the U.S. dollar against foreign currencies. Also called exchange-rate risk.

Income Risk. The possibility that a fixed-income fund's dividends will decline as a result of falling overall interest rates.

Industry Risk. The possibility that a group of stocks in a single industry will decline in price due to developments in that industry.

Inflation Risk. The possibility that increases in the cost of living will reduce or eliminate a fund's real inflation-adjusted returns.

Interest Rate Risk. The possibility that a bond fund will decline in value because of an increase in interest rates.

Manager Risk. The possibility that an actively managed mutual fund's investment adviser will fail to execute the fund's investment strategy effectively resulting in the failure of stated objectives.

Principal Risk. The possibility that an investment will go down in value, or "lose money," from the original or invested amount.

Pandemic Risk. Large-scale outbreaks of infectious disease that can greatly increase morbidity and mortality over a wide geographic area, crossing international boundaries, and causing significant economic, social, and political disruption.

Asset Class Risk. Securities in your portfolio(s) or in underlying investments such as mutual funds may underperform in comparison to the general securities markets or other asset classes.

Concentration Risk. To the extent that JBF recommends portfolio allocations that are concentrated in a particular market, industry or asset class, your portfolio is susceptible to loss due to adverse occurrences affecting that market, industry, or asset class.

Equity Securities Risk. Equity securities are subject to changes in value that are attributable to market perception of a particular issuer or general stock market fluctuations that affect all issuers. Investments in equity securities are more volatile than other types of investments.

Foreign Securities Risk. Foreign investments tend to be more volatile than U.S. securities, and are subject to risks that are not typically associated with U.S. securities. For example, such investments are adversely affected by changes in currency rates and exchange control regulations, unfavorable political, social and economic developments, and the possibility of seizure or nationalization of companies or imposition of withholding taxes on income. Moreover, less information is publicly available concerning certain foreign issuers than is available concerning U.S. companies. Foreign markets tend to be more volatile than the U.S. market due to economic and political instability, social unrest and regulatory conditions in certain countries.

Emerging Market Securities Risk. Many of the risks with respect to foreign investments are more pronounced for investments in developing or emerging market countries, which include several countries in Asia, Latin America, Eastern Europe, Africa, and the Middle East. The economies of many of these countries depend heavily upon international trade and are therefore significantly affected by protective trade barriers and economic conditions of their trading partners. Many of these countries have government exchange controls, currencies with no recognizable market value relative to the established currencies of developed market economies, little or no experience in trading in securities, no financial reporting standards, a lack of banking or securities infrastructure, and a legal tradition which does not recognize rights to private property.

Growth Securities Risk. Growth companies are companies whose earnings growth potential appears to be greater than the market, in general, and whose revenue growth is expected to continue over an extended period. Stocks of growth companies or “growth securities” have market values that are more volatile than those of other types of investments. Growth securities typically do not pay a dividend, which helps cushion stock prices in market downturns and reduce potential losses.

Issuer Risk. Your account’s performance depends on the performance of individual securities in which your account invests. Any issuers performing poorly, causing the value of its securities to decline. Poor performance is caused by poor management

decisions, competitive pressures, changes in technology, disruptions in supply, labor problems or shortages, corporate restructurings, fraudulent disclosures, or other factors. Changes to the financial condition or credit rating of an issuer of those securities causes the value of the securities to decline.

Management Risk. The performance of your account is subject to the risk that our investment management strategy will not produce the intended results.

Market Risk. Your account will lose money over short periods due to short-term market movements and over longer periods during market downturns. The value of a security declines due to general market conditions, economic trends, or events that are not specifically related to the issuer of the security or to factors that affect a particular industry or industries. During a general downturn in the securities markets, multiple asset classes are negatively affected.

Political Risk. Government decisions can damage the value of your investments. Changes to social security, benefits law, and tax law impact your financial decisions. Any foreign investments are impacted by the decision of their local governments.

Market Trading Risks. Your investment account faces numerous market trading risks, including the potential lack of an active market for investments held in your account and losses from trading in secondary markets.

Passive Investment Risk. JBF uses a passive investment strategy that is not actively managed where we do not attempt to take defensive positions in declining markets.

Larger Company Securities Risk. Securities of companies with larger market capitalizations underperform securities of companies with smaller and mid-sized market capitalizations in certain economic environments. Larger, more established companies might be unable to react as quickly to new competitive challenges, such as changes in technology and consumer tastes. Some larger companies are unable to grow at rates higher than the fastest growing smaller companies, especially during extended periods of economic expansion.

Option Trading Risk. There are multiple risks associated with options transactions, in particular, uncovered options transactions. Investors who buy options lose the premium paid, plus commissions or any other transaction expenses. Writing options generates higher risks than buying options. Writing options involves margin trading, creating leverage risk. The seller of an option has a legal obligation to purchase or sell the underlying asset if the option is exercised, subjecting the seller to the risk of price

movement of the underlying asset. The risk of writing covered call options (the seller of the option already owns the underlying asset) is limited. However, writing uncovered options is highly risky and speculative. Writing uncovered call options (the seller of the option does not own the underlying asset) can lead to unlimited losses.

Liquidity Risk. A security is not able to be sold at the time desired without adversely affecting the price.

Regulatory Risk. Changes in government regulations adversely affect the value of a security. An insufficiently regulated industry or market might also permit inappropriate practices that adversely affect an investment.

Smaller Company Securities Risk. Securities of companies with smaller market capitalizations, historically, tend to be more volatile and less liquid than larger company stocks. Smaller companies have no or relatively short operating histories, or be newly public companies. Some of these companies have aggressive capital structures, including high debt levels, or are involved in rapidly growing or changing industries and/or new technologies, which pose additional risks.

Value Style Investment Risk. Value stocks perform differently from the market as a whole and from other types of stocks. Value stocks purchased based upon the belief that a given security is out of favor. Value investing seeks to identify stocks that have depressed valuations, based upon a number of factors which are thought to be temporary in nature, and to sell them at superior profits when their prices rise when the issues which caused the valuation of the stock to be depressed are resolved. While certain value stocks increase in value more quickly during periods of anticipated economic upturn, they also lose value more quickly in periods of anticipated economic downturn. Furthermore, there is a risk that the factors which caused the depressed valuations are longer term or even permanent in nature, and that there will not be any rise in value. Finally, there is the increased risk in such situations that such companies will not have sufficient resources to continue as ongoing businesses, which would result in the stock of such companies potentially becoming worthless.

Interests in partnerships investing in real estate. Real estate investment trusts (“REITs”) allow individuals to invest in large-scale, income-producing real estate. A REIT is a company that owns and typically operates income-producing real estate or related assets. These include office buildings, shopping malls, apartments, hotels, resorts, self-storage facilities, warehouses, and mortgages or loans. Unlike other real estate companies, a REIT does not develop real estate properties to resell them. Instead, a REIT

buys and develops properties primarily to operate them as part of its own investment portfolio.

Many REITs are registered with the Securities and Exchange Commission and are publicly traded on a stock exchange. These are known as publicly traded REITs. Others are registered with the Securities and Exchange Commission but are not publicly traded. These are known as non-traded REITs (also known as non-exchange traded REITs). This is one of the most important distinctions among the various kinds of REITs. Before investing in a REIT, you need to understand whether or not it is publicly traded, and how this could affect the benefits and risks to you.

There are some risks, especially with non-exchange traded REITs because they do not trade on a stock exchange, such as:

- **Lack of Liquidity.** Non-traded REITs are illiquid investments. They cannot be sold readily on the open market. If you need to sell an asset to raise money quickly, you will not be able to do so with shares of a non-traded REIT.
- **Share Value Transparency.** While the market price of a publicly traded REIT is readily accessible, it can be difficult to determine the value of a share of a non-traded REIT. Non-traded REITs typically do not provide an estimate of their value per share until 18 months after their offering closes. This can be years after you have made your investment. As a result, for a significant time period you will be unable to assess the value of your non-traded REIT investment and its volatility.
- **Distributions Paid from Offering Proceeds and Borrowings.** Investors who are attracted to non-traded REITs is because of their relatively high dividend yields compared to those of publicly traded REITs. Unlike publicly traded REITs, however, non-traded REITs frequently pay distributions in excess of their funds from operations. To do so, they use offering proceeds and borrowings. This practice, which is typically not used by publicly traded REITs, reduces the value of the shares and the cash available to the company to purchase additional assets.
- **Conflicts of Interest.** Non-traded REITs typically have an external manager instead of their own employees. This leads to potential conflicts of interests with shareholders. For example, the REIT pays the external manager significant fees based on the amount of property acquisitions and assets under management. These fee incentives likely will not necessarily align with the interests of shareholders.

Alternative Strategy Mutual Funds. Certain mutual funds available in the program invest primarily in alternative investments and/or strategies. Investing in alternative investments and/or strategies will not be suitable for all investors and involves special

risks, such as risks associated with commodities, real estate, leverage, selling securities short, the use of derivatives, potential adverse market forces, regulatory changes and potential illiquidity. There are special risks associated with mutual funds that invest principally in real estate securities, such as sensitivity to changes in real estate values and interest rates and price volatility because of the fund's concentration in the real estate industry.

Closed-End Funds. Client should be aware that closed-end funds available within the program are not readily marketable. In an effort to provide investor liquidity, the funds offer to repurchase a certain percentage of shares at net asset value on a periodic basis. Thus, clients will be unable to liquidate all or a portion of their shares in these types of funds.

Exchange Traded Funds (ETFs). An ETF is an investment fund traded on stock exchanges, similar to a stock. Investing in ETFs carries the risk of capital loss. Areas of concern include the lack of transparency in portfolios, increasing complexity, high management fees, and the possibility of inadequate regulatory compliance. ETF prices may vary significantly from their underlying Net Asset Value due to market conditions, and certain Exchange Traded Funds may not track underlying benchmarks as advertised. ETFs are also subject to the following risks: (1) an ETF's shares may trade at a market price that is above or below their net asset value; (2) the ETF may employ an investment strategy that utilizes high leverage ratios; or (3) trading of an ETF's shares may be halted or delisted from an exchange if the listing exchange's officials deem such action appropriate. JBF has no control over the risks taken by the underlying funds in which client's invest.

Discount/Premium to NAV. Generally, ETF shares trade at or near their most recent net asset value (NAV). The NAV represents the value of each share's portion of the fund's underlying assets and cash at the end of the trading day. The NAV is generally calculated at least once daily for indexed based ETFs and potentially more frequently for actively managed ETFs. However, certain inefficiencies in the markets may cause the shares to trade at a premium or discount to the NAV.

Index Tracking Error. This is the extent to which any ETF deviates from the index that it is set up to mimic. Managing this is a key job for the manager of the fund, and how they have performed is something for the client to look at by comparing the fund's record with the selected index in the fund documents or on the manager's website. Some asset classes, such as emerging markets, are likely to demonstrate more tracking error than others.

Liquidity/Shutdown. There is no guarantee that an active secondary market for an ETF will develop or continue to exist. Therefore, if a liquid secondary market ceases to exist for shares of a particular ETF, a shareholder may have no way to sell those shares. In the event that an ETF becomes very unpopular and has minimal demand, the fund can be shut down and liquidated. When the fund is liquidated shareholders are paid in cash and transaction costs and capital gains/losses can be incurred.

Authorized Participants (APs). One of the major parties at the center of the creation and redemption process for ETFs. They provide a large portion of liquidity in the ETF market by obtaining the underlying assets required to create a fund. Traditionally, APs are large banks such as JP Morgan Chase, Bank of America, Goldman Sachs, and Morgan Stanley, among others. If there was a credit or liquidity crisis, ETFs bear the risk of failure due to the potential non-participation of their APs. When a client invests in ETFs, the client indirectly pays its proportionate share of any fees and expenses of those funds (management fees, etc.). Therefore, in some funds, clients may incur high expenses. 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).

Exchange-Traded Notes (ETNs). An ETN is a senior unsecured debt obligation designed to track the total return of an underlying market index or other benchmark. ETNs are linked to a variety of assets, for example, commodity futures, foreign currency and equities. ETNs are similar to ETFs in that they are listed on an exchange and can be bought or sold throughout the trading day. However, an ETN is not a mutual fund and does not have a net asset value; the ETN trades at the prevailing market price. Some of the more common risks of an ETN are as follows. The repayment of the principal, interest (if any), and the payment of any returns at maturity or upon redemption are dependent upon the ETN issuer's ability to pay. In addition, the trading price of the ETN in the secondary market is adversely impacted if the issuer's credit rating is downgraded. The index or asset class for performance replication in an ETN may or may not be concentrated in a specific sector, asset class or country and therefore carry specific risks.

Leveraged and Inverse ETFs, ETNs and Mutual Funds. Leveraged ETFs, ETNs and mutual funds, sometimes labeled "ultra" or "2x" for example, are designed to provide a multiple of the underlying index's return, typically on a daily basis. Inverse products are designed to provide the opposite of the return of the underlying index, typically on a daily basis. These products are different from and can be riskier than traditional ETFs, ETNs and mutual funds. Although these products are designed to provide returns that generally correspond to the underlying index, they are not able to exactly replicate the performance of the index because of fund expenses and other factors. This is referred to

as tracking error. Continual re-setting of returns within the product add to the underlying costs and increase the tracking error. As a result, this prevents these products from achieving their investment objective. In addition, compounding of the returns can produce a divergence from the underlying index over time, in particular for leveraged products. In highly volatile markets with large positive and negative swings, return distortions are magnified over time. Because of these distortions, these products should be actively monitored, as frequently as daily, and are not appropriate as an intermediate or long-term holding. To accomplish their objectives, these products use a range of strategies, including swaps, futures contracts and other derivatives. These products are diversified and can be based on commodities or currencies. These products have higher expense ratios and be less tax-efficient than more traditional ETFs, ETNs and mutual funds.

Options. JBF uses certain types of option trading are permitted in order to generate income or hedge a security held in the JBF Income account; namely, the selling (writing) of covered call options or the purchasing of put options on a security held in the account. You should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such cases, the security is called away and your account will no longer hold the security. The risk of buying long puts is limited to the loss of the premium paid for the purchase of the put if the option is not exercised or otherwise sold by the program account.

Structured Products. Structured products are securities derived from another asset, such as a security or a basket of securities, an index, a commodity, a debt issuance, or a foreign currency. Structured products frequently limit the upside participation in the reference asset. Structured products are senior unsecured debt of the issuing bank and subject to the credit risk associated with that issuer. This credit risk exists whether or not the investment held in the account offers principal protection. The creditworthiness of the issuer does not affect or enhance the likely performance of the investment other than the ability of the issuer to meet its obligations. Any payments due at maturity are dependent on the issuer's ability to pay. In addition, the trading price of the security in the secondary market, if there is one, is adversely impacted if the issuer's credit rating is downgraded. Some structured products offer full protection of the principal invested, others offer only partial or no protection. Investors are sacrificing a higher yield to obtain the principal guarantee. In addition, the principal guarantee relates to nominal principal and does not offer inflation protection. An investor in a structured product never has a claim on the underlying investment, whether a security, zero coupon bond, or option. There is little or no secondary market for the securities

and information regarding independent market pricing for the securities will be limited. This is true even if the product has a ticker symbol or has been approved for listing on an exchange. Tax treatment of structured products is different from other investments held in the account (e.g., income is taxed as ordinary income even though payment is not received until maturity). Structured CDs that are insured by the FDIC are subject to applicable FDIC limits.

Item 9 Disciplinary Information

This item requires us to disclose certain disciplinary events that either a) occurred within the past 10 years or b) are material to your evaluation of JBF's advisory business.

Early in my career, in 2003, I consented to sanctions imposed by the NASD, and in 2005 was the subject of a Consent Order issued by the Connecticut Securities and Business Investment Division, as a result of selling unregistered private placement securities issued by Alpha Telecom.

The NASD sanction imposed a fine of \$5,000, and the Connecticut Consent Order imposed a fine of \$500 and a permanent bar on transacting securities business as a broker/dealer agent or investment adviser representative in that state. At this time, the CT bar has expired and I am free to register in CT as an investment advisor.

Item 10 Other Financial Industry Activities and Affiliations

A. Broker-Dealer or Representative Registration

JBF is not a broker-dealer nor are is Jesse a registered representative of a broker-dealer.

B. Futures or Commodity Registration

JBF does not have an application pending as a futures commission merchant, commodity pool operator, or a commodity trading advisor, or as an associated person of the foregoing entities.

C. Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Jesse Bradin is a licensed insurance agents to sell life and annuity contracts. Our financial plan process involves using annuity contracts to reduce risk and provide lifetime income. **This activity results in commission based compensation on these transactions. This creates a conflict of interest. A conflict of interest exists because I can recommend products for which I can receive commission-based compensation, i.e. insurance.** You always have the right to decide whether to purchase insurance recommended by me and if you do purchase insurance, you have the right to decide from whom to purchase insurance. In recommending an insurance product, I will always act in your best interest under my fiduciary duty to you. You are not obligated to use JBF or me for insurance product services. I spend approximately 10% of my time on insurance-related activities.

Clients placed with TPMs 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. **J Bradin Financial, LLC 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 J Bradin Financial, LLC is paid a Solicitor Fee for recommending the TPMs and may choose to recommend a particular TPM based on the fee J Bradin Financial, LLC 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 TPMs given by J Bradin Financial, LLC and have the option to receive investment advice through other money managers of their choosing.

Prior to selecting TPMs, J Bradin Financial, LLC will ensure that they are properly licensed, or notice filed.

D. Other Material Conflicts of Interest

JBF has no other material conflicts of interest.

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

A. Code of Ethics Description

JBF is registered as an investment adviser with the state of North Carolina and maintains a Code of Ethics. We have adopted a Code of Ethics that sets forth the basic policies of ethical conduct for our business. In addition, the Code of Ethics governs personal trading by each employee of JBF deemed to be an Access Person, and is intended to ensure that securities transactions effected by Access Persons of JBF are conducted in a manner that avoids any conflict of interest between them our clients. JBF collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest.

B. Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Other than what has been described in this Brochure, JBF does not currently have any other material financial interest involving its recommendations to clients.

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

From time-to-time I purchase or sell products that JBF recommends to clients. This practice presents a conflict where, because of the information that we have, the Adviser or its related person are in a position to trade in a manner that adversely affect clients (e.g. place their own trades before or after client trades are executed in order to benefit from any price movements due to the clients' trades). In addition to affecting the Adviser's or its related person's objectivity, these practices by the Adviser or its related person also harm clients by adversely affecting the price at which the clients' trades are executed. To mitigate this conflict, JBF has a fiduciary duty to put the interests of their clients ahead of our own. We have adopted the following procedures in an effort to minimize such conflicts: We requires its related persons/access persons to pre-clear all transactions in their personal accounts with the Chief Compliance Officer, Jesse Bradin, who may deny permission to execute the transaction if such transaction will have any adverse economic impact on one of its clients. All of our related persons are required to disclose their securities transactions on a quarterly basis and holdings on an annual basis. Our related persons are also required to provide broker confirmations of each transaction in which they engage and a monthly certification of such transactions. Trading in employee accounts will be reviewed by the Chief Compliance Officer and

compared with transactions for the client accounts. Also, the investment advisory representatives are required to adhere to our Code of Ethics as outlined above in Item 11A.

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

See the response to Item 11C above.

Item 12 Brokerage Practices

A. Factors Used to Select Broker-Dealers for Client Transactions

JBF makes recommendations to clients about which broker-dealers and custodians to use based on their need for such services and additional factors such as cost, quality of service, and industry reputation.

JBF recommends Altruist Financial LLC to the majority of clients who choose JBF as their asset manager.

JBF relationship with the TPM, Gradient Investments, allows client who choose their assets managed by the TPM to use Charles Schwab custodial services.

Research and Other Soft Dollar Benefits

JBF does not receive research or other products or services other than execution from any broker-dealer or third party as a result of client securities transactions.

Brokerage for Client Referrals

JBF does not receive client referrals from any broker-dealer or third party as a result of the firm recommending that broker-dealer to clients.

The Custodian and Broker We Use- Altruist Financial LLC

For the benefit of no commissions or transaction fees, fully digital account opening, a large variety of security options and complete integration with software tools, JBF utilizes Altruist Financial LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the introducing broker to Apex Clearing Corporation, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as the clients' custodian. JBF does not receive any research or other soft-dollar benefit by nature from its relationship with Altruist Financial LLC, nor does JBF receive any referrals in exchange for using Altruist Financial LLC as a broker dealer or Apex Clearing Corporation as a custodian.

The Custodian and Broker We Use- TradeStation

For the benefit of low or no commissions or transaction fees, a wider variety of client account types supported, specific expertise with option trading and good integration with software tools, we also utilize TradeStation LLC, an unaffiliated SEC-registered broker dealer and FINRA/SIPC member, as an alternate broker-dealer and custodian for the JBF Income accounts. JBF does not receive any research or other soft-dollar benefit by nature from its relationship with TradeStation LLC, nor do we receive any referrals in exchange for using TradeStation LLC as a broker dealer or as a custodian.

Directed Brokerage

While JBF recommends specific custodians for clients to use however, you may custody your assets at a custodian of their choice. Similarly, JBF recommends that you use Altruist Financial LLC, Interactive Brokers LLC or TradeStation LLC as broker-dealer. You may also direct us to use a specific broker-dealer to execute transactions, but by allowing you to choose a specific custodian or broker-dealer, we may be unable to achieve most favorable execution of your transactions and this may cost you money over using a lower-cost custodian. JBF will allow clients to direct brokerage at the firm's sole discretion. You need to be aware that if you direct us to a particular broker-dealer for execution, we may be unable to achieve most favorable execution of client transactions. Directing brokerage costs clients more money than if we were to execute transactions through the custodian/broker-dealer relationships already in place which we believe have an established scale and price benefits. You may pay higher brokerage commissions because the custodian is not able to aggregate orders to reduce transaction costs, or your account receives less favorable prices.

B. Aggregating Securities Transactions for Client Accounts

JBF relies on the broker-dealer and the custodian to aggregate transactions in a block to achieve the best cost and price for you.

Item 13 Review of Accounts

A. Account Review Process

Investment advisory client accounts are monitored on an ongoing basis. Financial Plans, are reviewed annually with the client and updated where necessary. Client accounts (and/or financial plans) are reviewed by JBF working with each client, and we will oversee the annual reviews of your account. The nature of the review is to determine if your account is still in line with your stated objectives.

You are encouraged to notify us if changes occur in your personal financial situation that might materially affect your investment plan.

B. Ad-hoc reviews.

You are encouraged to notify us if changes occur in your personal financial situation that might materially affect your investment plan.

C. Describe the content and indicate the frequency of regular reports the firm provides to clients regarding their accounts. State whether these reports are written.

You will receive written statements no less than monthly from the qualified custodian. In addition, you will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, insurance companies, broker-dealers and others who are involved with client accounts.

JBF does not provide written reports to clients.

Item 14 Client Referrals and Other Compensation

A. Economic Benefits Provided to the Advisory Firm From External Sources and Conflicts of Interest

Other than what has been described in this Brochure, JBF does not accept compensation from any source not yet disclosed.

J Bradin Financial, LLC receives a portion of the annual management fees collected by the TPM(s) to whom J Bradin Financial, LLC refers Clients.

This situation creates a conflict of interest because J Bradin Financial, LLC and/or its Investment Advisor Representative have an incentive to decide what TPMs to use because of the potential higher solicitor fees to be received by J Bradin Financial, LLC. However, when referring Clients to a TPM, the Client's best interest will be the main determining factor of J Bradin Financial, LLC.

B. Advisory Firm Payments for Client Referrals

JBF does not directly or indirectly compensate any person for client referrals.

Item 15 Custody

JBF does not accept custody of client funds, securities or property.

As per NC law, if a firm requires prepayment of advisory fees of more than \$500 per client and more than six months in advance, it must comply with the custody requirements.

JBF does not accept the pre-payment of any fees, and therefore does not have custody of client funds as that is defined in NC law.

You should receive at least quarterly statements from the broker-dealer, or qualified custodian that holds and maintains clients' investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities

Item 16 Investment Discretion

JBF has discretion over the selection and amount of securities to be bought or sold in your accounts without obtaining prior consent or approval from you for each transaction. However, these purchases or sales will be subject to specified investment objectives, guidelines, or limitations previously agreed between you and JBF.

The granting of such discretionary authority will be evidenced by your execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by JBF will be in accordance with your investment objectives and goals.

Item 17 Voting Client Securities

JBF will not vote, nor advise clients how to vote, proxies for securities held in your accounts. You have the right to vote all proxies that companies solicit for securities held by the qualified custodians in your account. We will forward to you any proxy solicitations that we inadvertently receive for your evaluation and decision.

If you have specific questions about an action referenced in a proxy solicitation that you do not understand, or you want clarification about it, please contact us and we will try to help. Keep in mind we will not tell you how to vote. That ultimate decision is yours as the beneficial owner of the security.

Item 18 Financial Information

A. Balance Sheet

We are not required to include financial information in our Disclosure Brochure because we will not take physical custody of client funds or securities, or bill client accounts, six (6) months or more in advance for more than \$500.

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

JBF has discretionary authority over your accounts, and we are not aware of any financial condition that will likely impair our ability to meet contractual commitments to you.

If we do become aware of any such financial condition, this brochure will be updated and you will be notified.

Item 19 Requirements for State Registered Advisers

A. Principle Executive Officer

Jesse Bradin

Education:

B.S. Political Science
Trinity College, Hartford, CT

Financial and Insurance Exams Passed and Licenses Held:

Series 65 Uniform Investment Adviser Law Examination
Life & Health Insurance Licensed Producer

Business Background:

1995-2001 Registered Representative for several securities Broker Dealers in CT.
2001-2008 Real Estate agent and real estate development
2009-20017 Real estate development and residential and commercial contracting
2018-2021 Licensed Life & Health agent specializing in retirement asset protection
2021–Present: Owner, J Bradin Financial LLC, Registered Investment Adviser, Cary, NC

B. Other Business

Jesse Bradin actively sells insurance products as part of his financial planning practice. This activity is estimated to take up 10% of his business activities.

C. Performance-Based Fees

J Bradin Financial LLC does not engage in performance-based fees.

D. Material Facts

This item requires us to disclose certain disciplinary events that are material to your evaluation of JBF's advisory business.

Early in my career, in 2003, I consented to sanctions imposed by the NASD, and in 2005 was the subject of a Consent Order issued by the Connecticut Securities and Business Investment Division, as a result of selling unregistered private placement securities issued by Alpha Telecom.

The NASD sanction imposed a fine of \$5,000, and the Connecticut Consent Order imposed a fine of \$500 and a permanent bar on transacting securities business as a broker/dealer agent or investment adviser representative in that state.

E. Relationships with issuers of securities.

None

Privacy Policy
Our Commitment to You
J Bradin Financial LLC

J Bradin Financial LLC (“JBF”) is committed to safeguarding the use of your personal information that we have as your investment adviser. JBF (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does JBF provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account 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 privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information includes the following:

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

In addition, we collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;

- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, investment questionnaires;
- Information about your transactions with us or others

Information about You That Advisor Shares

We work to provide products and services that benefit our customers. We share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We also 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. In addition, your non-public personal information will also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy our regulatory obligations, and is otherwise required or permitted by law. Lastly, we will disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information about Former Clients

We do not disclose, and do not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

We recognize our need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll keep you informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy 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. You can obtain a copy of our current privacy policy by contacting us at 910-448-2884.