

Item 1: Cover Page

Fyvie Financial LLC

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Form ADV Part 2A – Firm Brochure

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Dated 1st July 2023

www.fyviefinancial.com

This Brochure provides information about the qualifications and business practices of Fyvie Financial LLC, “FyFin”. If you have any questions about the contents of this Brochure, please contact us at +1402-210-3197. 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.

Fyvie Financial LLC is registered as an Investment Adviser with the State of Nebraska. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about FyFin is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using the firm’s identification number, 309375.

Item 2: Material Changes

The following changes have been made to this version of the ADV:

Assets under Management

As of 31st December 2022, assets managed by the firm on a discretionary basis value at \$7,321,651 with 100% via a wrap program.

Fyvie Financial LLC also completes a variety of Financial Planning work for clients on a project, one-off fee/hourly basis, and financial planning reports which forms at least 50% of the annual revenue for the firm.

Platform options

For 2023, we are including a new option for asset management. We have added Pontera as a solution for our clients 3rd party accounts, employer retirement plans and other assets. We are able to bill on a brokerage account to cover fees charged for employer retirement accounts to ensure not withdrawal occurs from these plans (which would result in penalties).

We continue include the option to custody assets with Altruist, in addition to Interactive Brokers and Charles Schwab, TD Ameritrade (separately until their merger is completed). More information is found in the section related to other compensation about Altruist and soft dollar benefits received by the firm.

We continue to work with International SIPP provider Novia Global and utilize their services for our clients **IF** deemed necessary to facilitate their goals via UK regulated Financial Advice firms. Where this is deemed appropriate, we collaborate with the UK providers to ensure our clients receive the correct and relevant service.

Taxes, Bookkeeping services information

Our firm continues to complete tax returns, bookkeeping services and provides some consulting for small business owners who also work with our Financial Planning Team.

These services are not related to our Financial Planning and Investment Management services and there is no requirement for our clients to utilize this service. These services are billed, priced, and invoiced via separate agreements. We encourage clients to seek out an appropriate tax accountant in their additional country if they have cross-border needs who we will collaborate with to provide clients with a holistic service. We receive no introducer or solicitation fees for any cross-border associations.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. Either this complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Fyvie Financial LLC.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 309375.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at +1402-210-3197.

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Item 4: Advisory Business

Description of Advisory Firm

Fyvie Financial LLC is registered as an Investment Adviser with the State of Nebraska. FyFin was founded in May 2020. Katherine A Derisson is the principal owner of FyFin. As of 31st December 2022, assets managed by the firm on a discretionary basis value at \$7,321,651 with 100% via a wrap program all of which are on a discretionary basis and \$0 on a non-discretionary basis.

Types of Advisory Services

Fyvie Financial LLC's ("FyFin" or "Advisor") principal service is providing fee-based investment advisory services and financial planning services.

Investment Management Services

This service involves managing individually tailored investment portfolios on a discretionary basis. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets.

We will also review and discuss a client's prior investment history, as well as family composition and background. Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

We will meet with the client on at least an annual basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account.

Fees pertaining to this service are outlined in Item 5 of this brochure.

- **Primary investment management offering**

We offer to client's management of their investments in-house as the typical standard option. This includes analyzing assessment answers regarding risk, capacity for loss, ethical considerations, and other goal/risk factors before creating a portfolio.

Financial Planning Reports and Project Based Financial Planning Services

We provide project based financial planning reports and services on a holistic basis or on specific topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

Financial planning involves an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial

planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the Client. Clients purchasing this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all the following areas of concern. The Client and FyFin will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing

employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.
- **Cross-border considerations**
This includes ensuring the client is aware of the situation their finances will be affected by no longer being classed a US resident, citizen or other issue following their situation. We highlight the risks, the potential exposure to penalties or issues with holding particular investments and other items.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes.

We will participate in meetings or phone calls between you and your tax professional with your approval.

This service does not include fees for Investment Management Services.

Ongoing Financial Planning

This service involves working one-on-one with a planner over an extended period. By paying a fixed monthly fee, Clients get to work with a planner who will work with them to develop and implement a plan.

A Client will be taken through financial behaviors, habits, mindset, establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefit, retirement planning, insurance, investments, college planning, and estate planning.

The Client's financial situation and goals will be monitored throughout the year and follow-up phone calls (the regularity of which agreed at the out-set) and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of the financial plan to ensure accuracy and ongoing appropriateness. The Client will be provided with a summary of financial planning work completed annually, in arrears, and analysis of areas discussed and plans to move forward, either electronically or written.

This service does not include fees for Investment Management Services.

Educational Seminars and Speaking Engagements

We may provide seminars on an "as announced" basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual's person's need, nor does FyFin provide individualized investment advice to attendees during these seminars.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client-specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Persons Residing Outside of the United States

Services for client's residing outside of the United States may be restricted or limited due to custodial rules or other factors. Financial planning, tax advice or estate planning review services and advice shall be limited in scope to those matters governed by the laws of the United States and its state and local jurisdictions. Clients MUST have an exposure to the USA via residency, citizenship or other way.

Investment options and strategies may differ from our typical recommendations, including but not limited to, restricted trading and customer service windows due to foreign exchange operating hours and foreign tax treatment of investment transactions in the United States. In addition, foreign laws or requirements may also impact our ability to service accounts or require additional disclosure as determined on an individual country basis.

The client will be responsible for satisfying all legal and tax reporting requirements of both the United States and all applicable foreign governments. Any person located outside of the United States who wishes to open an account, or existing client who locates outside of the United States, will be subject to the custodian's policy regarding that country (including their right to decline to open or maintain the account), and all applicable customer identification and anti-money laundering regulations.

FyFin reserves the right, in its sole discretion, to decline an engagement with any prospective client outside of the United States, or terminate an engagement with an existing client, if they move outside of the United States into a jurisdiction FyFin does not wish to continue with a relationship.

The client will be given 60 days' notice, and the client is to give FyFin 30 days' notice of relocation.

UK Cross-border consulting services

FyFin provides limited pension consulting and advisory services to United Kingdom ("UK") nationals or other nationals residing in the United States who have pension assets held within the United Kingdom.

In these cases, FyFin may review the suitability of the Clients current UK pension plan and other tax vehicles in the UK, and recommend seeking advice, if required, via a UK Qualified and Registered individual, to allow for transferring these pension assets to a Self-Invested Personal Pension ("SIPP") and/or other applicable plans.

FyFin currently does not work with any QROP providers.

FyFin will gather financial information, goals, and objectives from the client and, upon authorization from the Client, will request a statement of benefit from the Client's existing UK pension plan administrators and other assets to ensure a global holistic view is obtained of the client's positions. Exchange rates used are published by the US Treasury annually and are used as a reference versus the rate of exchange on any particular day.

We will generally deliver to the Client a written view of the Client's UK pension assets as part of their whole financial picture. If suitable and in the client's best interest, FyFin will assist with contracting a UK regulated investment firm to facilitate the transfer of pension assets to a "Self-Invested Personal Pension" ("SIPP") and/or other applicable plans.

Depending on the UK pension that is being transferred, Clients may be required to receive advice in conjunction with an FCA regulated advisor with the relevant permissions for the transfer of Safe Guarded Benefits.

Any costs for this FCA regulated advice **will be paid by the client directly.**

As always, this determination will depend on the circumstances of the Client.

Upon transfer, all pension assets are held by a regulated pension plan trustee (authorized by the relevant financial services regulator where the pension plan is held) and subject to the terms and conditions of a separate agreement between the client and the pension plan trustee. All pension arrangements recommended will be those available to USA residents for their existing UK pension assets.

These can include a Self-Invested Personal Pension ("SIPP") and/or other applicable plans. Pension assets are typically managed by the client's selected third-party Investment Manager and subject to the terms and conditions of a separate management agreement between the client's pension trustee and the investment manager chosen.

FyFin will assist the client in selecting and managing the third-party Investment Manager.

FyFin will also assist the Client in establishing investment objectives for the account alongside their USA accounts, exposure and risk assessments, and defining any reasonable restrictions on the account, subject to acceptance by the third-party investment manager.

Clients are strongly encouraged to review the agreement between the client and the pension trustee and any other disclosure materials (like Key Features documents) provided by the pension trustee and/or the investment manager selected for a full understanding of the services provided and any associated costs therein. FyFin will provide ongoing advisory services to any pension assets transferred and will continue to monitor any pension trustees and third-party Investment Managers selected.

Pension plan statements and other reports are generally sent directly to Clients on an annual basis (unless requested more frequently) by the selected pension trustee, the Custodian, Investment Manager, and/or others similarly involved with the Clients pension plan.

Clients are encouraged to review such material carefully for a complete understanding of the services offered and the costs associated with the management of such pension plans.

FyFin advocates those clients using this service or having cross-border needs, seek out an Accountant, Enrolled Agent, CPA or other Accounting person to complete their tax return requirements, and to inform them of any information they would need to know regarding any international SIPP account.

FyFin can assist with providing cross-border tax information, and form completion to the appropriate parties to complete tax return requirements, however, it is still up to the client to provide relevant documentation to the Accountant at FyFin and check for completeness.

These services are billed separately. Additionally, no service for the taxation, bookkeeping or otherwise shall be completed until after a separate agreement is in place and agreed in advance.

Wrap Fee Programs

We do offer and participate in a wrap fee program.

Please refer to Appendix 1 of our Part 2A, Wrap Fee Brochure. Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

We do not manage assets within wrap fee accounts in a different fashion than non-wrap fee accounts.

Item 5: Fees and Compensation

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

FyFin treats the custodial and securities execution fees charged by the custodian and executing broker-dealer in one of two ways.

- Either the client is responsible for all costs and will pay them directly out of the account,
- or FyFin's management fee will include all such costs and they will be paid by FyFin.

Therefore, in the former method, the client will pay the management fee solely for advisory services and will also directly pay any transaction costs assessed by the executing broker-dealer or custodian, such as commissions and transaction fees.

The latter method is typically characterized as a “wrap fee,” where the management fee includes the investment advisory services as well as all transaction costs and the client pays only that management fee and no other costs concerning the trading and maintaining of the account. Clients in the wrap fee accounts, with the transaction and custody costs included, may pay a higher Management Fee than those where those costs are not included in the fee.

The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client based on what services are utilized and working with FyFin on. For example, if you wish for us to complete a financial plan, plus ongoing services with monthly consulting on your situation, we can do this. If you wish to DIY your own investment management but come to us for a financial report, these fees are not negotiable.

Investment Management Services

Our standard advisory fee is based on the **market** value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	0.85%
\$1,000,001 - \$2,000,000	0.75%
\$2,000,001 and Above	0.70%

Fee example:

\$3,000,000 invested in a non-wrap fee program from 1 Jan – 31 Dec in 4 different accounts, 3 valued at \$500,000 and 1 valued at \$1,500,000

\$0-\$500,000 @ 0.85% = \$4,250

X 3 accounts

\$0-\$1,000,000 @ 0.85% PLUS \$1,000,001 to \$1,500,000 @ 0.75% = \$8,500 + \$3750 = \$12,250

X 1 accounts

Total billed = \$25,000

On a monthly basis $\$25,000/365 = \68.49 * number of days in that month = billed based on the value on the last day of the month PLUS

25 trades per year per small account @ \$10 = $\$250 * 3 = \$1,000$

75 trades per year per large account @ \$10 = $\$750 * 1 = \750

Total cost \$27,500

These annual fees are **NOT** negotiable. Fees are pro-rated and paid in arrears monthly, as agreed with the client, and based on the **market** value of portfolio assets of the account managed by FyFin as of the last day of business of the month.

New account fees will be prorated from the inception of the account to the end of the month.

TD Ameritrade accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Charles Schwab accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Interactive Brokers accounts: Client authorizes Interactive Brokers to calculate and deduct the advisory fee and forward Adviser’s portion of the fee to the Adviser. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Please note: the fees described above are not inclusive of transaction fees or any other fees assessed by the broker-dealer or custodian.

Investment Management Services Wrap Fees

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.90%
\$2,000,001 and Above	0.80%

Fee example:

\$3,000,000 invested in a wrap fee program from 1 Jan – 31 Dec

\$0-\$1,000,000 @ 1% = \$10,000

\$1,000,001 - \$2,000,000 @ 0.9% = \$8,999

\$2,000,001 - \$3,000,000 @ 0.8% = \$7,999
Total billed = \$26,998

On a monthly basis $\$26,998/365 = \73.97 * number of days in that month = billed based on the value on the last day of the month.

The annual fees **may** be negotiable depending on other services received from FyFin. Fees are pro-rated and paid in arrears monthly unless agreed otherwise with the client and based on the **market** value of portfolio assets of the account managed by FyFin as of the last day of business of the month.

New account fees will be prorated from the inception of the account to the end of the month.

TD Ameritrade accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Charles Schwab accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Interactive Brokers accounts: Client authorizes Interactive Brokers to calculate and deduct the advisory fee and forward Adviser's portion of the fee to the Adviser. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Pontera Fees

For accounts held outside of the platforms (Altruist, IKBR, TD Ameritrade and Charles Schwab), we utilize a service called Pontera.

If we manage ERISA regulated retirement plans held outside of the above platforms, we must bill out of an alternative account due to the fact to bill them directly, like we do with discretionary accounts managed on the four platforms above, would be classed as a withdrawal.

We will discuss how this will be completed before we go ahead with any arrangement and agreement. Pontera fees are **NOT** negotiable.

You are responsible for **ALL** platform costs and charges associated with trading and account fees, however for management of these assets our fees are split.

0.30% of all fees detailed below are paid directly to Pontera for the platform service they provide, and the remainder is billed as our management fee only. The **TOTAL** of the fees we charge including the Pontera are as follows:

Account Value	Annual Fee
\$0 - \$1,000,000	0.75%
\$1,000,001 - \$2,000,000	0.70%
\$2,000,001 and Above	0.65%

Fee Example:

Based on a value of \$1,500,000 invested in a wrap fee program using Pontera for held away accounts:

\$0-\$1,000,000 @ 0.75% = \$7,500

\$1,000,001 - \$1,500,000 @.07% = \$3,499

Total billed = \$10,999

Pontera will bill us \$4,500 directly, which we pay out of the total amount billed, leaving \$6,499 as our billed fee for managing these accounts.

These fees **MUST** be debited from a non-retirement account to be compliant with retirement account withdrawal rules, regardless of where funds are held away.

Financial Planning Reports and Project Based Financial Planning Fixed Fees

Financial Planning Reports and Project Based Financial Planning will be offered on a fixed fee basis.

The fixed fee will be agreed upon before the start of any work.

Financial Planning Reports for US domestic individuals and families:

- The fee can range between \$2,000 per individual, up to \$12,500 for complex cases for a family/trust. The fee is determined after a conversation confirming what is to be included and dependent upon complexity of subject matter and consideration points.

All clients can choose to split the fee payment over 4 months, with the final payment due at completion of work, however, FyFin will not bill an amount above \$1,200.00 more than 6 months in advance.

Fees for this service may be paid by electronic funds transfer via AdvicePay software or Quickbooks invoice – secure payment portals. In the event of termination any prepaid but unearned fees will be refunded to the Client and any completed deliverables of the project will be provided to the Client and no further fees will be charged. We will not accept cash payments via any other method. If the client should wish, they can pay by check at the discretion of the firm.

Ongoing Financial Planning

Ongoing Financial Planning consists of an ongoing fee that is paid monthly of \$195 for a period of not less than 6 months. For this service may be paid by electronic funds transfer via AdvicePay or Quickbooks invoice and must be set up on a recurring basis. This includes a 1-hour phone call each month and work behind the scenes each month. Some will require more input than other months from the client.

This service may be terminated with 30 days' notice after the initial 6 months. Upon termination of any agreement, the fee will be pro-rated, and any unearned fee will be refunded to the Client.

Financial Planning Hourly Fee

Hourly Financial Planning engagements are offered at an hourly rate of \$195 per hour, depending on complexity with a minimum of 3 hours booked in advance.

The fee may be negotiable in certain cases, depending on other services used and is due at the completion of the engagement. In the event of early termination by the Client, any fees for the hours already worked will be due. Fees for this service may be paid by electronic funds transfer or check.

Fees for Tax Services and Business Strategy Consultation

We provide Tax Preparation services for our clients to assist with the filing of federal and state tax returns for individuals, trusts and businesses. The fees associated with tax preparation services are separate and in addition to your financial planning or advisory fees. We may ask for an explanation or clarification of some items, but we will not audit or otherwise verify client data. The client is responsible for the completeness and accuracy of information used to prepare the returns. Our responsibility is to prepare the returns in accordance with applicable tax laws. We may observe opportunities for tax savings that require planning or changes in the way the client handles some transactions. While an engagement for tax return preparation does not include significant tax planning services, we will share any ideas we have with you and discuss terms for any additional work that may be required to implement those ideas.

Annual income tax return(s) preparation fee can range between \$195 and \$2000 per return, depending on the complexity, the number of income tax schedules to be prepared and the number of state(s) with which the client is required to file income tax returns. The fee is due at the completion of the engagement. Since income tax preparation fees are paid in arrears, no rebate will be needed to be issued to clients upon termination of the account. For income tax compliance related services (other than annual tax preparation fee), such as estimating quarterly tax payments due as well as supporting and representing clients for IRS / state tax audits, the hourly rate is \$75 per hour, depending on the complexity. Fees for income tax compliance related services may be paid by electronic funds transfer, credit card or check.

This service is completed by an individual with experience specifically in Tax preparation and in Accounting and overseen by the CCO.

Persons Residing Outside of the United States

Services for client's residing outside of the United States may be restricted or limited due to custodial rules or other factors. Fees range from \$4,000 - \$12,500 for any Financial Planning report or Project discussed and agreed upon in advance with the client once FyFin has been given the clients complete situational information. Fees are split into equal payments for up to 6 months.

Financial planning, tax advice or estate planning review services and advice shall be limited in scope to those matters governed by the laws of the United States and its state and local jurisdictions.

Investment options and strategies may differ from our typical recommendations, including but not limited to, restricted trading and customer service windows due to foreign exchange operating hours and foreign tax treatment of investment transactions in the United States. In addition, foreign laws or requirements may also impact our ability to service accounts or require additional disclosure as determined on an individual country basis.

The client will be responsible for satisfying all legal and tax reporting requirements of both the United States and all applicable foreign governments.

UK Cross-border consulting services

FyFin provides limited pension consulting and advisory services to United Kingdom ("UK") nationals or other nationals residing in the United States who have pension assets held within the United Kingdom.

In these cases, FyFin may review the suitability of the Clients current UK pension plan and other account types in the UK or just in differing currencies, to allow for transferring these pension assets to a Self-Invested Personal Pension ("SIPP") and/or other applicable plans.

FyFin does not work with any QROP providers, and we will not work with these providers due to lack of usefulness with US regulations and also costs are prohibitive in most cases. If this is something a client wishes to utilize, we would recommend the client seeks advice elsewhere.

FyFin will gather financial information, goals, and objectives from the client and, upon authorization from the Client, will request a statement of benefit from the Client's existing UK pension plan administrators and other assets to ensure a global holistic view is obtained of the client's positions. Exchange rates used are published by the US Treasury annually and are used as a reference versus the rate of exchange on any day.

We will generally deliver to the Client a written view of the Client's UK pension assets as part of their whole financial picture. If suitable and in the client's best interest, FyFin will assist with contracting a UK regulated investment firm to facilitate the transfer of pension assets to a "Self-Invested Personal Pension" ("SIPP") and/or other applicable plans.

Depending on the UK pension that is being transferred, Clients may be required to receive advice in conjunction with an FCA regulated advisor with the relevant permissions for the transfer of Safe Guarded Benefits.

Any costs for this FCA regulated advice **will be paid by the client directly.**

As always, this determination will depend on the circumstances of the Client.

FyFin can assist with providing cross-border tax information, and form completion to the appropriate parties to complete tax return requirements, however, it is still up to the client to provide relevant documentation to the Accountant at FyFin and check for completeness.

These services are billed separately. Additionally, no service for the taxation, bookkeeping or otherwise shall be completed until after a separate agreement is in place and agreed in advance. Fees are aligned with the Financial Planning Report and Investment Management structures.

Educational Seminars/ Speaking engagements

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from free to \$1,000 per seminar or free to \$100 per participant. Half of the fees are due prior to the engagement, and the other half is to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, the number of hours of preparation needed, and the number of attendees. In the event of inclement weather or flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

If the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred and will provide payment for 50% of the Speaker's fee if the cancellation occurs within 30 days of the event. In the event the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational Seminars and Speaking Engagements may be provided pro-bono at FyFin's discretion.

Other Types of Fees and Expenses

For clients that utilize our *non-wrap* Investment Management services, our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client.

- Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

For clients that utilize our *Wrap Fees* Discretionary Investment Management Services, our fees are inclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client.

- Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. (See Form ADV Part 2A Appendix 1 - WRAP Brochure).
- Our custodian may offer mutual fund share classes that are free to transact but carries a higher internal expense for the client. This creates a conflict of interest. It is our firm policy that we will always purchase the share class with the lowest cost for the client, regardless of the cost for us to transact.

We do 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.

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

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to:

- individuals,
- high net-worth individuals,
- charitable organizations,
- corporations,
- or other businesses.

We **do not** have a minimum account size requirement.

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

When we complete an Investment Analysis as part of a financial plan, our approach involves analyzing investment portfolios from the standpoints of diversification, asset allocation and modern portfolio theory, risk factors.

Diversification

Diversification involves investing in companies from many industries, countries, and geographical regions with the goal of reducing or offsetting the risks that each of these factors pose in a portfolio individually. Diversified portfolios are less susceptible to single company, sector, and geographic risks but remain exposed to the systematic risk of the broad market.

Socially Responsible Investing; Environmental, Social and Governance

Our Environmental, Social, and Governance (ESG) strategies seek to invest in the securities of companies (or funds containing such securities) that demonstrate one or more positive characteristics concerning environmental, social, and corporate governance (“ESG”). This approach resonates with many who seek to align investment decisions with core values. It is also the Firm’s judgement that such strategies will become increasingly effective for generating investment returns as concerns around climate change, equality, and culture become essential to the forward-looking strategies of publicly traded companies. Our approach is to follow the client’s requirements following a thorough assessment via a variety of software methods to assess their morals and ethics. We screen individual companies for our single stock portfolios and ETF’s and mutual funds to remove or purposefully advocate for the clients goals.

Asset Allocation and Modern Portfolio Theory

Asset Allocation refers to the composition of different kinds of assets such as cash, stocks, and bonds within a portfolio and to the subdivisions within those asset classes such as U.S. or foreign and small or large companies. According to Modern Portfolio Theory, a concept first developed in the 1950s and refined in the years since, different asset classes have different expectations for risk and return, and those expectations can be used to construct a portfolio with the highest expected return for a given level of risk. Modern Portfolio Theory assumes a diversified portfolio, consistent allocation percentages for each asset class, and a long enough time horizon to average out the significant expected variation in investment returns from year to year.

The underlying principles of Modern Portfolio Theory are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Other Risk Factors

Risk Factors are measures of the volatility of different types of assets based on their past returns. Academic research has shown that the total risk of an asset or portfolio can be broken down into its exposures to each underlying risk factor. This can be useful for determining a portfolio's exposure to different types of risks, and for evaluating whether a portfolio or fund manager has added or subtracted value beyond what can be explained by total risk exposure. Risk factors are based on past performance and assume a consistent portfolio management style, so they may have limitations for predicting future risk and returns.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies.

Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies.

A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times.

Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment.

The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes.

Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity.

The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry.

Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket.

Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling

covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. 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; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) 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. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Investment Companies Risk. When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of 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).

Item 9: Disciplinary Information

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

FyFin and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of FyFin or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

FyFin is an independent firm, without material industry affiliations. Neither the firm nor its employees are registered or have pending registrations as: a broker-dealer, a futures commission merchant, a commodity pool operator, or a commodity trading advisor.

FyFin only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Recommendations or Selections of Other Investment Advisers

FyFin will only recommend an alternative Investment Advisor who is properly licensed or registered as an investment adviser if FyFin is unable to work with the client due to capacity or conflict of interest.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

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

Our firm and its “related persons” may buy or sell securities like, or different from, those we recommend to Clients for their accounts. To reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions.

Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as Clients. We will not trade non-mutual fund securities on around days prior to the same security for Clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Fyvie Financial LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services.

We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently receive soft dollar benefits by nature of our relationship with Interactive Brokers LLC, TD Ameritrade Institutional.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Based on the client’s circumstances we may recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice.

Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transaction and this may cost Clients money over using a lower-cost custodian.

The Custodian and Brokers We Use (Altruist, TD Ameritrade, Charles Schwab & Interactive Brokers)

We recommend that you use Altruist; TD Ameritrade, Inc., member FINRA/SIPC/NFA; Charles Schwab and/or Interactive Brokers, LLC, member FINRA/NYSE/SIPC; among others, for brokerage and custodial services.

Altruist

For clients who choose to have an account with Altruist Financial LLC (“Altruist”), which is an SEC-registered broker-dealer, FINRA member and member of SIPC that provides an online trading platform. Their securities transactions will generally be executed via Altruist Financial LLC, as a custodian for Client accounts. Participating Clients will receive no commissions or transaction fees, fully digital account opening, a large variety of security options, and complete integration with software tools.

TD Ameritrade

FyFin participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”) member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker dealer. TD Ameritrade offers to independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. FyFin receives benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

Charles Schwab

For clients who have an account with Charles Schwab (“Charles Schwab”), which is an SEC-registered broker-dealer, FINRA member and member of SIPC that provides a global online trading platform, their securities transactions will generally be executed through Charles Schwab. Charles Schwab maintains custody of some of our clients’ assets and executes and clears some of our customer trades. FyFin is independently owned and operated and is not affiliated with or a related person of Charles Schwab.

Interactive Brokers

For clients who have an account with Interactive Brokers LLC (“Interactive Brokers”), which is an SEC-registered broker-dealer, FINRA member and member of SIPC that provides a global online trading platform, their securities transactions will generally be executed through Interactive Brokers. Interactive Brokers maintains custody of some of our clients’ assets and executes and clears some of our customer trades. FyFin is independently owned and operated and is not affiliated with or a related person of, Interactive Brokers.

Aggregating (Block) Trading for Multiple Client Accounts

FyFin may block Client trades at their discretion should the client account have blackout periods for trading due to employment and other similar situations.

FyFin does not participate in aggregating (Block) trading for clients. We do not aggregate orders for clients as we do not have the opportunity to do so with how we manage client accounts. We do not offer model portfolios and each client is treated as an individual. When we are trading on an account, it is at a specific time for that client based on currency fluctuations, investment goals, timelines, and other reasons. Therefore, it is near impossible for us to trade on multiple accounts at the same time.

Item 13: Review of Accounts

Client accounts with the Investment Advisory Service will be reviewed regularly on a minimum of a quarterly basis by Katherine A Derisson, Founder and CCO. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

The Client will be invited to meet at least annually to go over the Adviser's review of their portfolio and any recommendations.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Item 14: Client Referrals and Other Compensation

Other than described below, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

FyFin considers a number of factors before recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, access to markets, overall knowledge of the market, responsiveness, their commission rates or other fee schedules, their custodial services, reputation within the industry, their level of net capital (financial strength) and excess SIPC and other insurance coverage.

Specific disclosure for Altruist

FyFin currently does not have any soft dollar benefits or research tools provided to FyFin by Altruist. As Altruist are a newer platform than those more established, they may provide benefits in future, and we will update when this occurs.

There may be economic benefits such as no fees and trade costs but otherwise, none.

Specific disclosure for Interactive Brokers

We believe that the commissions charged by Interactive Brokers are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

We note that Interactive Brokers has been Rated Low Cost Online Broker 15 years in a row by Barron's. In addition, the Transaction Auditing Group, Inc. (TAG), a third-party provider of transaction analysis, has determined that Interactive Brokers' U.S. stock and options executions have outperformed the industry for the last ten straight years – from 2007 through 2016. Although the brokerage commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other broker-dealers, we seek best execution for our clients and strive to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by Interactive Brokers.

Interactive Brokers offers products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), pre-trade allocation tools that facilitate trading for multiple clients at once, facilitating payment of our fees from clients' accounts assisting with back office functions, recordkeeping and client reporting.

These services may be used to service all or a substantial number of client accounts, including (in some cases) accounts not maintained at Interactive Brokers. FyFin may also receive services from Interactive Brokers or its affiliates that are intended to help our firm manage and further develop our business. These services may include website design and technology support. Interactive Brokers also has arrangements with various product vendors, which enable our firm to purchase their products at a discount.

These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research.

FyFin does not participate in any commission-sharing arrangements with Interactive Brokers or receive soft dollar credits. As a fiduciary to our clients, we are required to disclose that there is an inherent conflict of interest when our firm recommends that clients maintain their assets at Interactive Brokers. These recommendations may be based in part on the benefits we receive from Interactive Brokers, such as the availability of the above-mentioned products and services, and not solely on our clients' interest in receiving the most favorable execution. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Specific disclosure for TD Ameritrade

FyFin participates in TD Ameritrade's institutional customer program and FyFin may recommend TD Ameritrade to Clients for custody and brokerage services.

There is no direct link between FyFin's participation in the program and the investment advice it gives to its Clients, although FyFin receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving FyFin participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money

managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to FyFin by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by FyFin's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit FyFin but may not benefit its Client accounts. These products or services may assist FyFin in managing and administering Client accounts, including accounts not maintained at TD Ameritrade.

Other services made available by TD Ameritrade are intended to help FyFin manage and further develop its business enterprise. The benefits received by FyFin or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, FyFin endeavors at all times to put the interests of its Clients first.

Clients should be aware, however, that the receipt of economic benefits by FyFin or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the FyFin's choice of TD Ameritrade for custody and brokerage services.

Specific disclosure for Charles Schwab

Charles Schwab offers products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), pre-trade allocation tools that facilitate trading for multiple clients at once, facilitating payment of our fees from clients' accounts assisting with back office functions, recordkeeping and client reporting. These services may be used to service all or a substantial number of client accounts, including (in some cases) accounts not maintained at Charles Schwab. FyFin may also receive services from Charles Schwab or its affiliates that are intended to help our firm manage and further develop our business. These services may include website design and technology support. Charles Schwab also has arrangements with various product vendors, which enable our firm to purchase their products at a discount. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research. Please note: Charles Schwab and TD Ameritrade will be merging due to a buy-out and at this point we will update our documentation to reflect this.

Item 15: Custody

FyFin does not accept custody of Client funds except in the instance of withdrawing Client fees. Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's 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.

For Client accounts in which FyFin instructs the custodian to debit the advisory fee:

- i. FyFin will send a copy of its invoice to the custodian while it sends the Client a copy.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.

- iii. The Client will provide written authorization to FyFin permitting them to be paid directly for their accounts held by the custodian.

Item 16: Investment Discretion

FyFin offers Investment Management services on both a discretionary, and non-discretionary basis.

For those client accounts where we provide investment management services, on a non-discretionary basis, we do not exercise discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. The client must authorize all purchase and sell transactions prior to execution. This service is clearly notated on the investment advisory agreement.

For those client accounts where FyFin provides investment management services on a discretionary basis, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney which will grant our firm discretion over the account.

Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. This service is clearly notated on the investment advisory agreement.

Clients can place limitations or restrictions on purchases of specific company stocks or funds based on Ethical considerations or for any reason they so wish to. The Client must tell the Advisor if it is not covered during the process of discussing risk tolerance. The Client is responsible for telling FyFin 48 hours prior to any investing to start on the clients account.

Item 17: Voting Client Securities

We do not vote Client proxies.

Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$1,200 in fees per Client six months in advance.

Additional Information

Trade Errors

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

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries because of actions, misconduct, or negligence by issuers of securities held by you.

IRA Rollover Considerations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we may charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of:

1. Leaving the funds in your employer's (former employer's) plan.
2. Moving the funds to a new employer's retirement plan.
3. Cashing out and taking a taxable distribution from the plan.
4. Rolling the funds into an IRA rollover account.

Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney.

Item 19: Requirements for State-Registered Advisers

Katherine Anne Derisson

Born: 1984

Educational Background

- 2005 - English Language and Literature – BA Hons, University of Wales, Swansea, United Kingdom

Business Experience

- 05/2020 – Present, Fyvie Financial LLC, Founder and CCO
- 07/2018 – 05/2020, Hightower Omaha, Private Wealth Advisor
- 10/2017 – 06/2018, Edward Jones, Financial Advisor
- 07/2014 – 11/2016, Prydis Wealth, Financial Advisor and Retirement Plan Specialist

Professional Designations, Licensing & Exams

n/a

Other Business Activities

Katherine A Derisson is a co-owner of Your Financial Matters US. This activity accounts for approximately 20% of their time each month.

Performance-Based Fees

FyFin is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Fyvie Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Fyvie Financial LLC nor Katherine A Derisson, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Additional Compensation

Katherine A Derisson does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through FyFin.

Supervision

Katherine A Derisson, as Founder and Chief Compliance Officer FyFin is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

Katherine A Derisson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Fyvie Financial LLC

15306 Lafayette Ave
Omaha, NE 68154
+1402-210-3197

Dated 1st July 2023

Form ADV Part 2B – Brochure Supplement

For

Katherine A Derisson CRD# 6862751

Founder and Chief Compliance Officer

This brochure supplement provides information about Katherine A Derisson that supplements the Fyvie Financial LLC, (“FyFin”) brochure. A copy of that brochure precedes this supplement. Please Katherine A Derisson if the FyFin brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Katherine A Derisson is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 6862751.

Item 2: Educational Background and Business Experience

Katherine Anne Derisson

Born: 1984

Educational Background

- English Language and Literature – BA Hons, University of Wales, Swansea, United Kingdom

Business Experience

- 05/2020 – Present, Fyvie Financial LLC, Founder and CCO
- 07/2018 – 05/2020, Hightower Omaha, Private Wealth Advisor
- 10/2017 – 06/2018, Edward Jones, Financial Advisor
- 07/2014 – 11/2016, Prydis Wealth, Financial Advisor and Retirement Plan Specialist

Professional Designations, Licensing & Exams

n/a

Item 3: Disciplinary Information

No management person at Fyvie Financial LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Katherine A Derisson is a co-owner of Your Financial Matters US. This activity accounts for approximately 20% of their time each month.

Item 5: Additional Compensation

Katherine A Derisson does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through FyFin.

Item 6: Supervision

Katherine A Derisson, as Founder and Chief Compliance Officer of FyFin is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Katherine A Derisson has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.

Item 1: Cover Page

Fyvie Financial LLC

Form ADV Part 2A Appendix 1 – Wrap Fee Program Brochure

15306 Lafayette Avenue
Omaha, Nebraska 68154
+1 402-210-3197

www.fyviefinancial.com

Dated 1st July 2023

This Wrap Fee Program Brochure provides information about the qualifications and business practices of Fyvie Financial LLC. If you have any questions about the contents of this Brochure, please contact us at +1 402-210-3197. 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.

Fyvie Financial LLC registered as an Investment Advisor with the State of Nebraska. Registration of an Investment Advisor does not imply any level of skill or training. You are encouraged to review both this Brochure and the Brochure Supplements any of our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Additional information about Fyvie Financial LLC is available on the SEC's website at www.adviserinfo.sec.gov.

CRD: 309375

Item 2: Material Changes

Fyvie Financial LLC is required to advise you of any material changes to our Wrap Fee Program Brochure (“Wrap Brochure”) from our last annual update, identify those changes on the cover page of our Wrap Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Wrap Brochure. We must state clearly that we are discussing only material changes since the last annual update of our Wrap Brochure, and we must provide the date of the last annual update of our Wrap Brochure.

Please note we do not have to provide this information to a client or prospective client who has not received a previous version of our Wrap Brochure. Currently, there are no material changes to report about our Wrap Brochure.

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Item 4: Services, Fees and Compensation

Description of Our Services

We offer wrap fee programs as described in this Wrap Fee Program Brochure. Our wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

Types of Advisory Services

We offer the following services:

Investment Advisory Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets.

We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Please note, unless a Client has received the firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within five (5) business days of signing the contract without incurring any advisory fees. How we are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

FyFin treats the custodial and securities execution fees charged by the custodian and executing broker-dealer in one of two ways.

- Either the client is responsible for all costs and will pay them directly out of the account,
- or FyFin's management fee will include all such costs and they will be paid by FyFin.

Therefore, in the former method, the client will pay the management fee solely for advisory services and will also directly pay any transaction costs assessed by the executing broker-dealer or custodian, such as commissions and transaction fees.

The latter method is typically characterized as a “wrap fee,” where the management fee includes the investment advisory services as well as all transaction costs and the client pays only that management fee and no other costs concerning the trading and maintaining of the account. Clients in the wrap fee accounts, with the transaction and custody costs included, may pay a higher Management Fee than those where those costs are not included in the fee.

The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client based on what services are utilized and working with FyFin on. For example, if you wish for us to complete a financial plan, plus ongoing services with monthly consulting on your situation, we can do this and reduce any investment management fees. If you wish to DIY your own investment management but come to us for a financial report, these fees are not negotiable.

Investment Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	0.85%
\$1,000,001 - \$2,000,000	0.75%
\$2,000,001 and Above	0.70%

Fee example:

\$3,000,000 invested in a non-wrap fee program from 1 Jan – 31 Dec in 6 different accounts all valued at \$500,000

\$0-\$500,000 @ 0.85% = \$4,250

X 6 accounts

Total billed = \$25,500

On a monthly basis $\$25,000/365 = \69.86 * number of days in that month = billed based on the value on the last day of the month PLUS

25 trades per year per account @ \$10 = $\$250 * 6 = \$1,500$

Total cost \$27,000

The annual fees are NOT negotiable. Fees are pro-rated and paid in arrears monthly, as agreed with the client, and based on the value of portfolio assets of the account managed by FyFin as of the last day of business of the month.

New account fees will be prorated from the inception of the account to the end of the month.

TD Ameritrade accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing

period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Charles Schwab accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Interactive Brokers accounts: Client authorizes Interactive Brokers to calculate and deduct the advisory fee and forward Adviser’s portion of the fee to the Adviser. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Please note: the fees described above are not inclusive of transaction fees or any other fees assessed by the broker-dealer or custodian.

Investment Management Services Wrap Fees

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$0 - \$1,000,000	1.00%
\$1,000,001 - \$2,000,000	0.90%
\$2,000,001 and Above	0.80%

Fee example:

\$3,000,000 invested in a non-wrap fee program from 1 Jan – 31 Dec in 4 different accounts, 3 valued at \$500,000 and 1 valued at \$1,500,000

\$0-\$500,000 @ 0.85% = \$4,250
 X 3 accounts
 \$0-\$1,000,000 @ 0.85% PLUS \$1,000,001 to \$1,500,000 @ 0.75% = \$8,500 + \$3750 = \$12,250
 X 1 accounts
Total billed = \$25,000

On a monthly basis \$25,000/365 = \$68.49 * number of days in that month = billed based on the value on the last day of the month PLUS

25 trades per year per small account @ \$10 = \$250 * 3 = \$1,000
 75 trades per year per large account @ \$10 = \$750 * 1 = \$750
Total cost \$27,500

The annual fees *may* be negotiable depending on other services received. Fees are pro-rated and paid in arrears monthly unless agreed otherwise with the client and based on the value of portfolio assets of the account managed by FyFin as of the last day of business of the month.

New account fees will be prorated from the inception of the account to the end of the month.

TD Ameritrade accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Charles Schwab accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Altruist accounts: Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Interactive Brokers accounts: Client authorizes Interactive Brokers to calculate and deduct the advisory fee and forward Adviser's portion of the fee to the Adviser. Accounts initiated or terminated during a calendar month will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Pontera Fees

For accounts held outside of the platforms (Altruist, IKB, TD Ameritrade and Charles Schwab), we utilize a service called Pontera.

If we manage ERISA regulated retirement plans held outside of the above platforms, we must bill out of an alternative account due to the fact to bill them directly, like we do with discretionary accounts managed on the four platforms above, would be classed as a withdrawal.

We will discuss how this will be completed before we go ahead with any arrangement and agreement. Pontera fees are not negotiable.

You are responsible for **ALL** platform costs and charges associated with trading and account fees, however for management of these assets our fees are split.

0.30% of all fees detailed below are paid directly to Pontera for the platform service they provide, and the remainder is billed as our management fee only. The **TOTAL** of the fees we charge including the Pontera are as follows:

Account Value	Annual Fee
\$0 - \$1,000,000	0.75%
\$1,000,001 - \$2,000,000	0.70%
\$2,000,001 and Above	0.65%

Fee Example:

Based on a value of \$1,500,000 invested in a wrap fee program using Pontera for held away accounts:

\$0-\$1,000,000 @ 0.75% = \$7,500

\$1,000,001 - \$1,500,000 @ .07% = \$3,499

Total billed = \$10,999

Pontera will bill us \$4,500 directly, which we pay out of the total amount billed, leaving \$6,499 as our billed fee for managing these accounts.

These fees MUST be debited from a non-retirement account to be compliant with retirement account withdrawal rules, regardless of where funds are held away.

Item 5: Account Requirements and Types of Clients

We provide financial planning and portfolio management services to:

- individuals,
- high net-worth individuals,
- charitable organizations,
- corporations,
- or other businesses.

We do not have a minimum account size requirement.

Item 6: Portfolio Manager Selection and Evaluation

Outside Portfolio Managers

We do not refer to outside portfolio managers due to the nature of requirements of most of our client accounts. Some clients have restrictions due to residency-based taxation of their country that prohibits US funds and vice versa.

Fyvie Financial LLC Portfolio Managers

Our firm and its related person, Katherine A Derisson, may act as a portfolio manager for the wrap fee program previously described in this Wrap Fee Program Brochure, unless otherwise stated. This may create a conflict of interest in that other investment advisory firms may charge the same or lower fees than our firm for similar services.

Our related person portfolio managers are not subject to the same selection and review as outside portfolio managers that participate in the wrap fee program.

Advisory Business

See Item 4 of this Wrap Fee Program Brochure for information about our wrap fee advisory programs.

Individual Tailoring of Advice to Clients

We offer individualized investment advice to clients utilizing our Asset Management and Comprehensive Portfolio Management services.

The Ability of Clients to Impose Restrictions on Investing in Certain Securities or Types of Securities

We do allow clients to impose reasonable restrictions on investing in certain securities or types of securities such as ethical considerations or blackout stocks. In addition, in certain circumstances currency accounts may only be able to hold specific securities or individual stocks due to taxation law with the country of residency.

Participation in Wrap Fee Programs

Our wrap fee and non-wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc. We do not manage wrap fee accounts in a different fashion than non-wrap fee accounts.

Performance-based Fees and Side-by-Side Management

We do not charge performance-based fees and do not engage in side-by-side management

Methods of Analysis, Investment Strategies and Risk of Loss

When we complete an Investment Analysis as part of a financial plan, our approach involves analyzing investment portfolios from the standpoints of diversification, asset allocation and modern portfolio theory, risk factors.

Diversification

Diversification involves investing in companies from many industries, countries, and geographical regions with the goal of reducing or offsetting the risks that each of these factors pose in a portfolio individually. Diversified portfolios are less susceptible to single company, sector, and geographic risks but remain exposed to the systematic risk of the broad market.

Socially Responsible Investing; Environmental, Social and Governance

Our Environmental, Social, and Governance (ESG) strategies seek to invest in the securities of companies (or funds containing such securities) that demonstrate one or more positive characteristics concerning environmental, social, and corporate governance (“ESG”). This approach resonates with many who seek to align investment decisions with core values. It is also the Firm’s judgement that such strategies will become increasingly effective for generating investment returns as concerns around climate change, equality, and culture become essential to the forward-looking strategies of publicly traded companies. Our approach is to follow the client’s requirements following a thorough assessment via a variety of software methods to assess their morals and ethics. We screen individual companies for our single stock portfolios and ETF’s and mutual funds to remove or purposefully advocate for the clients’ goals.

Asset Allocation and Modern Portfolio Theory

Asset Allocation refers to the composition of different kinds of assets such as cash, stocks, and bonds within a portfolio and to the subdivisions within those asset classes such as U.S. or foreign and small or large companies.

According to Modern Portfolio Theory, a concept first developed in the 1950s and refined in the years since, different asset classes have different expectations for risk and return, and those expectations can be used to construct a portfolio with the highest expected return for a given level of risk. Modern Portfolio Theory assumes a diversified portfolio, consistent allocation percentages for each asset class, and a long enough time horizon to average out the significant expected variation in investment returns from year to year.

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio, as a whole, is more important than the selection of any particular security. The appropriate allocation of capital among assets classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Other Risk Factors

Risk Factors are measures of the volatility of different types of assets based on their past returns. Academic research has shown that the total risk of an asset or portfolio can be broken down into its exposures to each underlying risk factor.

This can be useful for determining a portfolio's exposure to different types of risks, and for evaluating whether a portfolio or fund manager has added or subtracted value beyond what can be explained by total risk exposure.

Risk factors are based on past performance and assume a consistent portfolio management style, so they may have limitations for predicting future risk and returns.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear.

Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies.

Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies.

A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times.

Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment.

The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes.

Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity.

The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry.

Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket.

Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. 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; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) 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. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Investment Companies Risk. When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of 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).

Proxies

We do not vote Client proxies.

Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 7: Client Information Provided to Portfolio Managers

We are required to describe the information about you that we communicate to your portfolio manager(s) and how often or under what circumstances we provide updated information. Our firm communicates with your portfolio manager(s) on a regular basis as needed (daily, weekly, monthly, etc.) to ensure your most current investment goals and objectives are understood by your portfolio

manager(s). In most cases, we will communicate such information as part of our regular investment management duties.

Nevertheless, we will also communicate information to your portfolio manager(s) when you ask us to, when market or economic conditions make it prudent to do so, etc.

Item 8: Client Contact with Portfolio Managers

Our clients may directly contact their portfolio manager(s) with questions or concerns by calling the number on this Brochure.

Item 9: Additional Information

Disciplinary Information

We have determined that our firm and management have no disciplinary information to disclose.

Criminal or Civil Actions

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

Administrative Enforcement Proceedings

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

Self-Regulatory Organization Enforcement Proceedings

FyFin and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of FyFin or the integrity of its management.

Other Financial Industry Activities and Affiliations

Fyvie Financial LLC is an independent firm, without material industry affiliations.

Neither the firm nor its employees are registered or have pending registrations as: a broker-dealer, a futures commission merchant, a commodity pool operator, or a commodity trading advisor.

Fyvie Financial LLC only receives compensation directly from Clients. We do not receive compensation from any outside source.

We do not have any conflicts of interest with any outside party.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all our dealings. The firm accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Additionally, Fyvie Financial LLC requires adherence to its Insider Trading Policy, and a Code of Ethics and Standards of Professional Conduct.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least

annually. Our firm will provide a copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Our firm, its associates, and any related person is not authorized to recommend to a client or effect a transaction for a client involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, advisor to the issuer, etc.

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

Our firm and its “related persons” may buy or sell securities like, or different from, those we recommend to Clients for their accounts.

To reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions.

Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as Clients.

We will not trade non-mutual fund securities on or around 5 days prior to the same security for Clients.

The Custodian and Brokers We Use (Altruist, TD Ameritrade, Charles Schwab & Interactive Brokers)

A We may recommend that you use Altruist; TD Ameritrade, Inc., member FINRA/SIPC/NFA; Charles Schwab and/or Interactive Brokers, LLC, member FINRA/NYSE/SIPC; among others, for brokerage and custodial services.

Altruist

For clients who choose to have an account with Altruist Financial LLC LLC (“Altruist”), which is an SEC-registered broker-dealer, FINRA member and member of SIPC that provides an online trading platform. Their securities transactions will generally be executed via Altruist Financial LLC, as a custodian for Client accounts. Participating

Clients will receive no commissions or transaction fees, fully digital account opening, a large variety of security options, and complete integration with software tools.

TD Ameritrade

FyFin participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade") member FINRA/SIPC. TD Ameritrade is an independent [and unaffiliated] SEC-registered broker dealer. TD Ameritrade offers to independent investment Advisors, services which include custody of securities, trade execution, clearance, and settlement of transactions. FyFin receives benefits from TD Ameritrade through its participation in the program.

Charles Schwab

For clients who choose to have an account with Charles Schwab ("Charles Schwab"), which is an SEC-registered broker-dealer, FINRA member and member of SIPC that provides a global online trading platform, their securities transactions will generally be executed through Charles Schwab. Charles Schwab maintains custody of some of our clients' assets and executes and clears some of our customer trades. FyFin is independently owned and operated and is not affiliated with or a related person of Charles Schwab.

Interactive Brokers

For clients who choose to have an account with Interactive Brokers LLC ("Interactive Brokers"), which is an SEC-registered broker-dealer, FINRA member and member of SIPC that provides a global online trading platform, their securities transactions will generally be executed through Interactive Brokers. Interactive Brokers maintains custody of some of our clients' assets and executes and clears some of our customer trades. FyFin is independently owned and operated and is not affiliated with or a related person of, Interactive Brokers.

Review of Accounts

Client accounts with the Investment Advisory Service will be reviewed regularly on a minimum of a quarterly basis by Katherine A Derisson, Founder and CCO. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

The Client will be invited to meet at least annually to go over the Adviser's review of their portfolio and any recommendations.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Client Referrals

Other than described below, we do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Fyvie Financial LLC considers a number of factors before recommending a particular broker-dealer to our clients, including but not limited to, their familiarity with the securities to be sold or purchased, their execution skills, order-flow capabilities, access to markets, overall knowledge of the market, responsiveness, their commission rates or other fee schedules, their custodial services, reputation within the industry, their level of net capital (financial strength) and excess SIPC and other insurance coverage.

Specific disclosure for Altruist

FyFin currently does not have any soft dollar benefits or research tools provided to FyFin by Altruist. As Altruist are a newer platform than those more established, they may provide benefits in future, and we will update when this occurs.

There may be economic benefits such as no fees and trade costs but otherwise, none.

Specific disclosure for TD Ameritrade

Fyvie Financial LLC participates in TD Ameritrade's institutional customer program and Fyvie Financial LLC may recommend TD Ameritrade to Clients for custody and brokerage services.

There is no direct link between Fyvie Financial LLC's participation in the program and the investment advice it gives to its Clients, although Fyvie Financial LLC receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Fyvie Financial LLC participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Fyvie Financial LLC by third party vendors.

TD Ameritrade may also have paid for business consulting and professional services received by Fyvie Financial LLC's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Fyvie Financial LLC but may not benefit its Client accounts. These

products or services may assist Fyvie Financial LLC in managing and administering Client accounts, including accounts not maintained at TD Ameritrade.

Other services made available by TD Ameritrade are intended to help Fyvie Financial LLC manage and further develop its business enterprise. The benefits received by Fyvie Financial LLC or its personnel through participation in the program do not depend on the number of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to Clients, Fyvie Financial LLC endeavors at all times to put the interests of its Clients first.

Clients should be aware, however, that the receipt of economic benefits by Fyvie Financial LLC or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Fyvie Financial LLC's choice of TD Ameritrade for custody and brokerage services.

Specific disclosure for Charles Schwab

Charles Schwab offers products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), pre-trade allocation tools that facilitate trading for multiple clients at once, facilitating payment of our fees from clients' accounts assisting with back-office functions, recordkeeping and client reporting. These services may be used to service all or a substantial number of client accounts, including (in some cases) accounts not maintained at Charles Schwab. FyFin may also receive services from Charles Schwab or its affiliates that are intended to help our firm manage and further develop our business. These services may include website design and technology support. Charles Schwab also has arrangements with various product vendors, which enable our firm to purchase their products at a discount. These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research. Please note: Charles Schwab and TD Ameritrade will be merging due to a buy-out and at this point we will update our documentation to reflect this

Specific disclosure for Interactive Brokers

We believe that the commissions charged by Interactive Brokers are competitive with similarly situated retail broker-dealers offering the same variety of securities to clients. Clients are advised, however, that they may be able to effect transactions in securities through other broker-dealers at lower commission rates, particularly with respect to securities listed on a national securities exchange or in the over-the-counter market.

We note that Interactive Brokers has been Rated Low Cost Online Broker 15 years in a row by Barron's. In addition, the Transaction Auditing Group, Inc. (TAG), a third-party provider of transaction analysis, has determined that Interactive Brokers' U.S. stock and options executions have outperformed the industry

as a whole for the last ten straight years – from 2007 through 2016. Although the brokerage commissions and/or transaction fees charged by Interactive Brokers may be higher or lower than those charged by other broker-dealers, we seek best execution for our clients and strive to ensure that our clients pay brokerage commissions and/or transactions fees which we have determined, in good faith, to be reasonable in relation to the value of the brokerage and other services provided by Interactive Brokers.

Interactive Brokers offers products or services other than execution that assist our firm in managing and administering client accounts. These may include software and other technology that provide access to client account data (such as trade confirmations and account statements), pre-trade allocation tools that facilitate trading for multiple clients at once, facilitating payment of our fees from clients' accounts assisting with back office functions, recordkeeping and client reporting.

These services may be used to service all or a substantial number of client accounts, including (in some cases) accounts not maintained at Interactive Brokers. Fyvie Financial LLC may also receive services from Interactive Brokers or its affiliates that are intended to help our firm manage and further develop our business. These services may include website design and technology support. Interactive Brokers also has arrangements with various product vendors, which enable our firm to purchase their products at a discount.

These products may include such items as: client reporting and consolidated statement software; client communication software; client relationship management software; compliance assistance; and investment research.

Fyvie Financial LLC does not participate in any commission-sharing arrangements with Interactive Brokers or receive soft dollar credits. As a fiduciary to our clients, we are required to disclose that there is an inherent conflict of interest when our firm recommends that clients maintain their assets at Interactive Brokers. These recommendations may be based in part on the benefits we receive from Interactive Brokers, such as the availability of the above-mentioned products and services, and not solely on our clients' interest in receiving the most favorable execution. Nonetheless, we seek to ensure that the securities transactions effected for our clients represent the best qualitative execution, not just the lowest possible cost.

Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

Item 10 Requirements for State-Registered Advisers

Material Relationships That Management Persons Have With Issuers of Securities

Fyvie Financial LLC, nor any management person including Katherine A Derisson, have any relationship or arrangement with issuers of securities.